4 ENVIRONMENTAL CONSEQUENCES

4.1 ENVIRONMENTAL CONSEQUENCES ASSOCIATED WITH OCS OIL AND GAS ACTIVITIES

This programmatic environmental impact statement (PEIS) evaluates 8 alternatives, including no action (see Chapter 2). All of the action alternatives identify Outer Continental Shelf (OCS) Planning Areas in the Gulf of Mexico (GOM), Cook Inlet, and the Arctic where lease sales may occur under the 2012-2017 OCS Oil and Gas Leasing Program (the Program). Chapter 3 of this PEIS describes the nature and condition of natural and socioeconomic resources that have a potential to be affected by oil and gas (O&G) activities within those OCS Planning Areas under the Program. In general, O&G development follows a four-phase process, beginning with (1) exploration to locate viable deposits, (2) development of the production well and support infrastructure, (3) operation (oil or gas production), and (4) decommissioning of the well once it is no longer productive or profitable.

Since lease- and project-specific details are not known at this time, the analyses in this PEIS take a programmatic approach and evaluate resources on a larger, more regional scale rather than at a lease-block scale (the scale at which project-specific impacts could occur). The evaluation of environmental consequences presented in this PEIS focuses on those resources most likely to be affected during future O&G development under each of the alternatives considered in this PEIS. Some information is currently unavailable, particularly with regard to affected environment baseline changes; however, this information is not essential in order to make a reasoned choice among alternatives at this programmatic stage (see Section 1.3.1.1: Incomplete and Unavailable Information). Exploration and development scenarios have been prepared that identify potential levels of O&G development that may occur as a result of lease sales in the GOM, the Cook Inlet, and the Chukchi and Beaufort Sea Planning Areas under the Program. These scenarios are presented for each alternative later in this chapter and are used for the programmatic impact analyses of this PEIS. More detailed, location-specific impact analyses would be conducted in subsequent lease sale-specific National Environmental Policy Act (NEPA) analyses.

The programmatic evaluation of environmental or socioeconomic impacts presented in this PEIS provides useful information for considering the effects of O&G development on the resources of the OCS (and associated coastal environments) under each alternative. The programmatic analyses identify the types of activities that typically occur during exploration, development, production, and decommissioning; the resources that could be affected by those activities; and the nature and relative magnitude of effects those resources could incur.

4.1.1 Routine Operations and Common Impact-Producing Factors

Impacts from OCS O&G development originate from the specific activities that occur following OCS leasing, and both activities and impacts will vary by the phase of O&G development. Each phase will have a set of impact-producing factors (some unique to a

particular phase) that represent O&G development activities that produce physical or environmental conditions that may affect one or more natural, cultural, or socioeconomic resources, and these may vary within each phase depending on the specific activity. For example, an impact-producing factor associated with exploration is noise, which will differ in its nature, magnitude, and duration depending on how it is generated. Noise generated by seismic survey equipment will differ in magnitude, frequency, and duration from noise generated during exploration well drilling or by ship traffic. The resources that could be affected by noise and the nature and magnitude of potential effects will also vary, depending on the source and characteristics of the noise (duration, frequency, magnitude) that is generated.

The nature, magnitude, and duration of each impact-producing factor (and any subsequent environmental effects) will also vary among the four phases of O&G development. For example, noise generated by seismic survey equipment will be relatively short term in duration but very high in magnitude, and will cease once the survey portion of the exploration phase is completed. Similarly, noise from the explosive removal of a platform during the decommissioning phase would be of very short-term duration (effectively a one-time event). In contrast, noise from ship and helicopter traffic that supports production platforms could be generated for 20 years or more, depending on the production lifespan of the platform. Table 4.1.1-1 presents the major categories of impact-producing factors associated with O&G development on the OCS. It is important to note that many impact-producing factors can be associated with multiple O&G development phases, and can be subject to mitigation measures to help reduce impacts.

The following discussions summarize the general types of activities that may be expected during each of the four O&G development phases and identify likely impact-producing factors for each phase. These impact-producing factors, the resources that each may affect, and the nature, magnitude, and duration of possible effects are discussed in more detail in the resource-specific impact sections presented later in this chapter.

4.1.1.1 Exploration

During exploration, typical activities include the conduct of geophysical seismic surveys and possibly the development of exploration wells. During seismic surveys, one or more air guns (or other sound sources) are towed behind a ship at depths of 5–10 m (16–33 ft) and produce acoustic energy pulses that are directed towards the seafloor. The acoustic signals then reflect off subsurface sedimentary boundaries and are recorded by hydrophones, which are typically also towed behind the survey ship. Following analysis of the acoustic data, one or more exploratory wells may be drilled to confirm the presence and determine the viability of the potential hydrocarbon reservoirs identified by the survey. Development of an exploration well typically involves the use of a mobile offshore drilling unit (MODU) (such as a jackup rig, a semisubmersible rig, or drillship) and the placement of infrastructure (such as a drilling template and a blowout preventer) on the seafloor to aid in the drilling. Both the seismic surveys and exploration well development involve the use of ships, whether to tow air guns and hydrophones or to bring drilling equipment and other support materials to the well location.

TABLE 4.1.1-1 Impact-Producing Factors Associated with OCS O&G Development Phases

	O&G Development Phase				
	Exploration				
Impact-Producing Factor	Seismic Survey	Exploration Well	Development	Operation	Decommissioning
Noise	X	X	X	X	X
Seismic noise	X				
Ship noise	X	X	X	X	X
Aircraft noise	X	X	X	X	X
Drilling noise		X	X		
Trenching noise			X		
Production noise				X	
Onshore construction			X		
Platform removal					X
Traffic	X	X	X	X	X
Aircraft traffic		X	X	X	X
Ship traffic	X	X	X	X	X
Drilling Mud/Debris		*X*	*X*		
Bottom/Land Disturbance		X	X		
Drilling		X	X		
Pipeline trenching			X		
Onshore construction			X		
Air Emissions		X	X	X	X
Offshore		X	X	X	X
Onshore			X	X	X
Explosives					X
Platform removal					X
Lighting		X	X	X	
Offshore facilities		X	X	X	
Onshore facilities			X	X	
Visible Infrastructure		X	X	X	
Offshore		X	X	X	
Onshore			X	X	
Space Use Conflicts	X	X	X	X	
Offshore facilities	X	X	X	X	
Onshore facilities			X	X	
Accidental Spills		X	X	X	

Impact-producing factors associated with exploration include noise, ship traffic, drilling mud and debris, seafloor disturbance, air emissions, lighting, visible infrastructure, and space use conflicts (Table 4.1.1-1). Noise will be generated by operating air gun arrays, vessel traffic, drilling, and support aircraft traffic. Resources of primary concern from noise impacts are marine mammals, sea turtles, and fish.

Ship traffic during the seismic surveys or in support of exploration well development has the potential for collisions with marine mammals and sea turtles, while the presence of ship and support aircraft traffic could affect normal behaviors of nearby biota (especially marine mammals). The disposal of drilling mud and debris during exploration well development will also affect local water quality and possibly biota.

Exploration well development will involve seafloor disturbance, primarily through the placement of drilling support infrastructure. This disturbance may affect overlying water quality as well as benthic biota and archeological resources (if present). Air emissions from the MODUs may affect local air quality, while MODU lighting may affect birds. Depending on location, MODUs may also present a visual impact. The conduct of seismic surveys and exploration well development could conflict with other uses of the marine environment at that location.

4.1.1.2 Development

Once exploration has confirmed the presence of a commercially viable reservoir, the next phase of O&G development is the construction of the production platform and drilling of production wells. Production wells are drilled using MODUs, and the type of production platform installed will depend on the water depth of the site and, to a lesser extent, on the expected facility lifecycle, the type and quantity of hydrocarbon product (e.g., oil or gas) expected, and the number of wells to be drilled. The number of wells per production platform depends on the type of production facility, the size of the hydrocarbon reservoir, and the drilling/production strategy for the drilling program. Production platforms may be fixed, floating, or subsea (only in deep water). Fixed platforms rigidly attached to the seafloor are typical in water depths up to 400 m (1,312 ft), while floating or subsea platforms are typically in waters deeper than 400 m (1,312 ft). Floating platforms are attached to the seafloor using line-mooring systems and anchors. Development will also include installation of seafloor pipelines for conveying product to existing pipeline infrastructure or to new onshore production facilities. In shallower waters (<60 m [<200 ft]), pipelines are typically buried to a depth of at least 0.91 m (3 ft) below the mudline. Pipelines may also be buried (trenched) in deeper waters, depending on conditions along the subsea pipeline corridor.

Impact-producing factors of development include noise, ship and helicopter traffic, drilling mud and debris, seafloor and land disturbance, air emissions, lighting, and visible infrastructure. During the development phase, noise will be generated during drilling, by ship and helicopter traffic, pipeline trenching, and onshore construction. Resources that could be affected by development-related noise include marine mammals, sea turtles, marine and coastal birds, and fish. Marine mammals and sea turtles could be affected by collisions with ship traffic

supporting platform construction and drilling, while the presence of ship and helicopter traffic could disturb normal behaviors of marine mammals and birds.

The disposal of drilling muds and fluids may affect local water quality and aquatic biota. Some amount of seafloor disturbance will occur as a result of drilling, platform mooring, and pipeline trenching, which would result in some loss of habitat and biota as well as reductions in overlying water quality. Seafloor disturbance could also affect archeological resources if present in the project area. Air emissions from platforms where drilling is occurring as well as at onshore construction sites could affect local air quality. The lighting of offshore platforms could affect birds, while lighting at onshore facilities could affect sea turtles. Visual impacts may be incurred for some developments, depending on the location and nature (size) of the offshore platform or onsite facilities. Development of production wells and platforms as well as of new pipelines and onshore processing facilities could result in some space use conflicts in the project area.

4.1.1.3 Operation

Following completion of the production wells and platform, the facilities are operated to extract the hydrocarbon resource and transport it to onshore processing facilities. During the operation phase, activities center on maintenance of the production wells (workover operations) and platforms. Impact-producing factors associated with normal operations include noise, ship and helicopter traffic, air emissions, lighting, and visible infrastructure (Table 4.1.1-1).

During normal operations, noise will be generated by maintenance activities and by ship and helicopter traffic and may affect marine mammals and fish. Collisions with support ships could affect marine mammals and sea turtles, while ship and helicopter traffic could disturb normal behaviors of nearby biota. As noted for the development phase, lighting of onshore facilities could affect sea turtles, while lighting of offshore platforms could affect birds. Any visual impacts identified for the development phase could continue for the duration of the operation phase. Similarly, some of the space use conflicts incurred during the development phase would continue through production.

4.1.1.4 Decommissioning

Following lease termination or relinquishment, all platforms and seafloor obstructions are required to be removed. All bottom-founded infrastructure is severed at least 5 m (15 ft) below the mudline. Production infrastructure could be removed using explosive or nonexplosive methods. Impact-producing factors associated with decommissioning include noise, ship and helicopter traffic, air emissions, and explosives.

Noise would be generated during either explosive or nonexplosive structure removal, as well as by ship and helicopter traffic supporting removal activities, and could affect marine mammals, sea turtles, and fish. Ship traffic could result in collisions with marine mammals and sea turtles, while ship and helicopter traffic could disturb behaviors of biota in the vicinity of the

platform undergoing decommissioning. Air emissions could affect local air quality. Pressure from explosive detonations could injure marine mammals, sea turtles, and fish. Some additional space use conflicts could arise with explosive platform removal.

4.1.2 Accidental Events and Spills

A variety of accidental events or spills may occur during OCS O&G development (Table 4.1.2-1). During normal operations, ship and platform activities generate a variety of solid waste materials, such as plastic containers, nylon rope and fasteners, and plastic bags. The accidental release of such solid waste materials could affect marine mammals, sea turtles, and birds. While sanitary and domestic wastes produced in ships and platforms are routinely processed through onsite waste treatment facilities, the accidental discharge of such releases could affect local water quality and biota.

Ships supporting platform activities may accidentally collide with MODUs or platforms, releasing diesel fuel, which could affect water quality and biota. Loss of well control results in the uncontrolled release of a reservoir fluid that may result in the release of gas, condensate or crude oil, drilling fluids, sand, or water. Historically, most losses of well control have occurred during development drilling operations, but loss of well control can happen during exploratory drilling, production, well completions, or workover operations (MMS 2008a). Releases associated with loss of well control may affect water quality, biota, and space use.

Oil spills are unplanned accidental events. Depending on the phase of O&G development and the location, magnitude, and duration of a spill, natural resources that may be affected include marine mammals, marine and coastal birds, sea turtles, fish, benthic and pelagic invertebrates, water quality, marine and coastal habitats, and areas of special concern (such as marine parks and protected areas). In addition, spills may also affect a variety of socioeconomic conditions such as local employment, commercial and recreational fisheries, tourism, sociocultural systems, and subsistence. Spill scenarios for the GOM, Cook Inlet, and Arctic planning areas have been developed for use in this PEIS and are presented in detail in Section 4.4.2. This draft PEIS also considers the potential effects of a catastrophic discharge event (i.e., a low probability, very large volume accidental oil spill).

4.1.3 Assessment Approach

The environmental consequences discussed in subsequent sections of Chapter 4 address the potential impacts that could be incurred under any of the seven action alternatives (Alternatives 1–7). Because Alternative 1, the Proposed Action, encompasses the six OCS Planning Areas considered for inclusion in the Program, OCS oil and gas activities that could occur following leasing under Alternative 1 may be expected to have the potential to cause impacts over the greatest geographic area. Any such potential impacts could also occur under the other action alternatives (Alternatives 2–7), as each represents a subset of the planning areas included in the proposed action. Thus, the analyses presented in Chapter 4, while focused on the proposed action, are fully applicable to each of the other action alternatives.

TABLE 4.1.2-1 Accidental Events and Spills That May Be Associated with OCS O&G Development Phases

	O&G Development Phase				
	Exploration				
Accidental Event or Spill	Seismic Survey	Exploration Well	Development	Operation	Decommissioning
Solid waste release	X	X	X	X	X
Sanitary waste release	X	X	X	X	X
Vessel collisions	X	X	X	X	X
Loss of well control		X	X	X	
Oil spills		X	X	X	X

It is not possible to identify specific impacts from future OCS O&G development activities without development-specific location and design details. There are, however, general impacts that are typical of offshore O&G development, regardless of where development occurs. For example, the placement of a seafloor pipeline crossing shallow waters to a landfall will require trenching, which will disturb the seafloor and affect the overlying water quality, regardless of whether that pipeline is located in Cook Inlet or in the Western GOM Planning Area. The potential effects of pipeline placement will, however, differ between shallow and deep waters and by the nature of the seafloor communities present along the actual pipeline route.

As previously discussed, lease- and project-specific details are not known at this time. Thus, the analyses in this PEIS take a programmatic approach and evaluate resources on a larger, more regional scale rather than at a lease-block scale (the scale at which project-specific impacts could occur). Thus, the evaluation of environmental consequences presented in this PEIS has focused on those resources most likely to be affected during future O&G development on the OCS under the alternatives presented in Chapter 2.

For each resource, the impact-producing factors identified in Tables 4.1.1-1 and 4.1.2-1 were further examined and refined to identify aspects of those factors specific to the resource under evaluation. The analyses also identified, as applicable, important components of each resource to further refine the relationship between the impacting factors and the resource. For example, for sea turtles, the impact analyses identified four life stages (eggs, hatchlings, juveniles, and adults), four habitat types (nesting, foraging, overwintering, and nursery), and three important behaviors (courtship/nesting, foraging, migration) that could be affected by OCS O&G development activities. The impact analyses then focused on the impact-producing factors that could affect any of these life stages, habitats, or behaviors. Table 4.1.3-1 illustrates the refinement and linkage of impacting factors and important resource components.

TABLE 4.1.3-1 Relationships among Development Phase Impacting Factors and Habitats, Life Stage, and Behavior of Sea Turtles

	Sea Turtle Resource Component										
	Habitat Disturbance or Loss				Life Stage Affected				Behavior Affected		
Development Phase and Impacting Factor	Nesting	Foraging	Overwintering	Nursery	Eggs	Hatchlings	Juveniles	Adults	Foraging	Courtship/ Nesting	Migration
Vessel noise						X	X	X	X		
Aircraft noise											
Drilling noise							X	X			
Trenching noise							X	X	X		
Onshore construction noise								X		X	
Offshore air emissions											
Onshore air emissions											
Aircraft traffic											
Vessel traffic						X	X	X			
Hazardous materials						X	X	X			
Solid wastes						X	X	X			
Drilling mud/debris						X	X	X			
Bottom disturbance from drilling											
Bottom disturbance from pipeline trenching		X	X	X			X	X	X	X	
Offshore lighting											
Onshore construction	X				X	X		X		X	
Onshore lighting	X					X		X		X	
Aircraft noise											
Offshore air emissions											
Onshore air emissions											
Vessel traffic						X	X	X			
Aircraft traffic											
Hazardous materials						X	X	X			
Solid wastes						X	X	X			
Explosive platform removal						X	X	X			
Offshore lighting											

4.1.4 Definition of Impact Levels

The conclusions for most resource analyses use a four-level classification scheme to characterize the impacts that could result with OCS O&G development under the alternatives presented in this PEIS.

4.1.4.1 Impact Levels for Biological and Physical Resources

The following impact levels for biological and physical resources are used for the analysis of water quality, air quality, marine and terrestrial mammals, marine and coastal birds, fish resources, sea turtles, coastal and seafloor habitats, and areas of special concern (such as essential fish habitats [EFHs], marine sanctuaries, parks, refuges, and reserves). For biota, these levels are based on population-level impacts rather than impacts on individuals.

- Negligible: No measurable impacts.

- Minor:
  - Most impacts on the affected resource could be avoided with proper mitigation.
  - If impacts occur, the affected resource will recover completely without mitigation once the impacting stressor is eliminated.

- Moderate:
  - Impacts on the affected resource are unavoidable.
  - The viability of the affected resource is not threatened although some impacts may be irreversible, or
  - The affected resource would recover completely if proper mitigation is applied during the life of the project or proper remedial action is taken once the impacting stressor is eliminated.

- Major:
  - Impacts on the affected resource are unavoidable.
  - The viability of the affected resource may be threatened, and
  - The affected resource would not fully recover even if proper mitigation is applied during the life of the project or remedial action is implemented once the impacting stressor is eliminated.

4.1.4.2 Impact Levels for Societal Issues

The following impact levels are used for the analysis of demography, employment, and regional income; land use and infrastructure; commercial and recreational fisheries; tourism and recreation; sociocultural systems; environmental justice; and archeological and historic resources.

- Negligible: No measureable impacts.

- Minor:
  - Adverse impacts on the affected activity, community, resource could be avoided with proper mitigation.
  - Impacts would not disrupt the normal or routine functions of the affected activity or community.

  - Once the impacting stressor is eliminated, the affected activity or community will, without any mitigation, return to a condition with no measureable effects.

- Moderate:
  - Impacts to the affected activity, community, or resource are unavoidable.
  - Proper mitigation would reduce impacts substantially during the life of the project.
  - A portion of the affected resource would be damaged or destroyed.
  - The affected activity or community would have to adjust somewhat to account for disruptions due to impacts of the project, OR
  - Once the impacting stressor is eliminated, the affected activity or community will return to a condition with no measurable effects if proper remedial action is taken.

- Major:
  - Impacts on the affected activity, community, or resource are unavoidable.
  - Proper mitigation would reduce impacts somewhat during the life of the project.
  - All of the affected resource would be permanently damaged or destroyed.
  - The affected activity or community would experience unavoidable disruptions to a degree beyond what is normally acceptable, and
  - Once the impacting agent is eliminated, the affected activity or community may retain measurable effects for a significant period of time or indefinitely, even if remedial action is taken.

4.2 RELATIONSHIP OF THE PHYSICAL ENVIRONMENT TO OIL AND GAS OPERATIONS

4.2.1 Physiography, Bathymetry, and Geologic Hazards

4.2.1.1 Gulf of Mexico

4.2.1.1.1 Physiography and Bathymetry. The GOM is a small ocean basin measuring 900 km (660 mi) from north to south and 1,600 km (990 mi) from east to west with a mean water depth of about 1,615 m (5,300 ft) (Bryant et al. 1991; GulfBase 2011). The basin is almost completely surrounded by continental landmasses. Its shoreline runs 5,700 km (3,500 mi) from Cape Sable, Florida, to the tip of Mexico's Yucatan Peninsula, with another 380 km (240 mi) of shoreline on the northwest tip of Cuba (GulfBase 2011).

The continental shelf extends from the coastline to a water depth of about 200 m (660 ft). Width of the shelf varies, ranging from 10 km (6 mi) near the Mississippi Delta to about 280 km

(175 mi) off the southern tip of Florida and the Yucatan Peninsula. Its topographic relief is relatively low. Extending from the edge of the shelf to the abyssal plain is the continental slope, a steep area with high topographic relief and diverse geomorphic features (canyons, troughs, and salt structures). The base of the slope occurs at a median depth of about 2,800 m (9,190 ft). The Sigsbee Deep, located within the Sigsbee Abyssal Plain in the southwestern part of the basin, is the deepest region of the GOM with a maximum depth ranging from 3,750 m (12,300 ft) to 4,330 m (14,200 ft). The GOM basin contains a volume of 2,434,000 km^3 (6.43×10^{17} gal) of water (Shideler 1985; GulfBase 2011).

Antoine (1972) has divided the GOM into physiographic provinces, the components of which correspond to the ecological regions delineated by the Commission for Environmental Cooperation (CEC) (Wilkinson et al. 2009). The physiographic regions presented below are organized from north to south. They are based on the CEC's nomenclature (Level II seafloor geomorphological regions[1]) and incorporate the physiographic descriptions of Antoine (1972), Bryant et al. (1991), Shideler (1985), Wilhelm and Ewing (1972), and GulfBase (2011).

Northern Gulf of Mexico Shelf and Slope. On its west side, the northern GOM shelf and slope extends from the Rio Grande (Texas) to Alabama and from 320 km (200 mi) inland of today's shoreline to the Sigsbee Escarpment. It encompasses the Texas-Louisiana Shelf and Slope and the Mississippi-Alabama Shelf (Figure 4.2.1-1). The major geologic feature in this province is the Mississippi Fan, which extends from the Mississippi River Delta to the central abyssal plain. The upper part of the fan (to a water depth of about 2,500 m or 8,200 ft) has a complex and rugged topography attributed to salt diapirism,[2] slumping, and current scour; the lower part of the fan by contrast is smooth, with a gently sloping surface that merges with the abyssal plain to the southeast and southwest. The Mississippi Canyon cuts the eastern side of the Texas-Louisiana Shelf to the southwest of the Mississippi River Delta. The submarine canyon is thought to have formed from large-scale slumping along the shelf edge. The area is characterized by thick sediments and widespread salt deposits.

To the east, the northern GOM shelf and slope extends from just east of the Mississippi River Delta near Biloxi, Mississippi, to the eastern side of Apalachee Bay (west Florida) and encompasses the West Florida Shelf and Terrace (Figure 4.2.1-1). The shelf in this region is characterized by soft terrigenous (land-derived) sediments. Sediments are thick west of DeSoto Canyon; Mississippi River-derived sediments cover the western edge of the carbonate platform of the West Florida Shelf. The Florida Escarpment, with slopes as high as 45° in places,

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[1] The CEC's Level II seafloor geomorphological regions are determined by large-scale physiography (e.g., continental shelf, slope, and abyssal plain) and extend offshore to a depth of 370 km (200 mi). The designation of Level II regions is helpful to understanding marine ecosystems because it illustrates the importance of depth as a major determinant of benthic marine communities and shows how physiographic features can influence current flows and upwelling (Wilkinson et al. 2009). Other sections (e.g., Section 3.2 on Marine and Coastal Ecoregions) provide finer scale Level III region descriptions that take into account local variables such as water mass, regional landforms, and biological community types on the continental shelf.

[2] Salt diapirism refers to a process by which natural salt (mainly halite but also including anhydrite and gypsum) in the subsurface deforms and flows in response to loading pressures from overlying sediments. Because of its low density, salt tends to flow upward from its source bed, forming intrusive bodies known as diapirs. Salt diapirs are common features of sedimentary basins like the Gulf of Mexico (Nelson 1991).

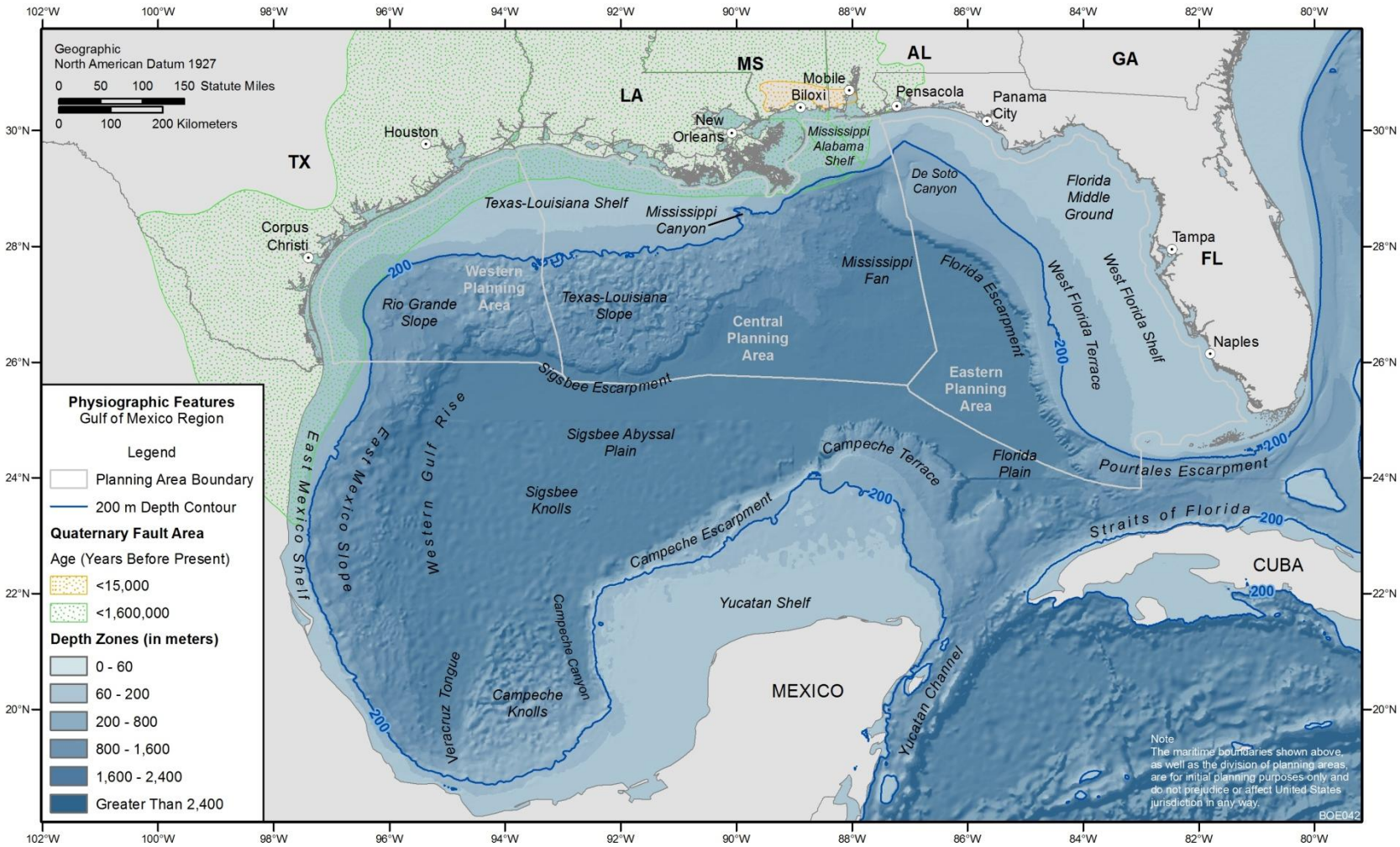

FIGURE 4.2.1-1 Physiographic Regions of the GOM (based on Bryant et al. 1991)

separates the West Florida Shelf from the deeper GOM basin and also forms the southeastern side of DeSoto Canyon.

South Florida/Bahamian Shelf and Slope. This region is the submerged portion of the Florida Peninsula. The region extends along the West Florida coast from Apalachee Bay southward to the Straits of Florida and includes the Florida Keys and Dry Tortugas. Sediments become progressively more carbonate (ocean-derived) from north to south with thick accumulations in the Florida Basin. The basin may have been enclosed by a barrier reef system at one time. The Jordon Knoll, located within the Straits of Florida, is composed of remnants of the ancient reef system.

Gulf of Mexico Basin. The GOM Basin consists of the continental rise, the Sigsbee Abyssal Plain, and the Mississippi Cone. The continental rise is situated between the Sigsbee Escarpment and the Sigsbee Abyssal Plain (Figure 4.2.1-1). It is a large wedge of sediments originating from the unstable continental slope (deposited by gravity flows). The Sigsbee Abyssal Plain is the deep, flat portion of the GOM bottom just northwest of the Campeche Escarpment. It is 450 km (280 mi) long and 290 km (180 mi) wide and covers an area of more than 103,600 km^2 (40,000 mi^2). The plain is underlain by very thick sediments (up to 9 km, or 5.6 mi); the only major topographical features in this region are the small salt diapirs that form the Sigsbee Knolls. The Mississippi Cone lies between the Mississippi Canyon to the west and DeSoto Canyon to the east. It is the portion of the Mississippi River Delta that has accumulated at the base of the continental slope.

4.2.1.1.2 Geologic Hazards. Several types of geologic hazards are known to occur in the marine environment of the GOM region, most of which present a risk to offshore oil and gas activities because they contribute directly or indirectly to seafloor instability. As a result, seafloor instability is likely the principal engineering constraint to the emplacement of bottom-founded structures, including pipelines, drilling rigs, and production platforms.

Geologic hazards within the GOM are common on the northern continental slope (Figure 4.2.1-1) because of its high sedimentation and subsidence rates and the compensating movement of underlying salt. Geologic hazards are frequently concentrated in the areas along the edges of intraslope basins[3] where topography is high and complex. These intervening regions are created by shallow diapiric salt bodies and are steeply sloped and highly faulted. They are also areas of natural fluid and gas migration to the seafloor surface (Roberts et al. 2005). The potential geologic hazards in the GOM region are described below.

Irregular Topography. The regional topography of the continental slope is irregular, consisting predominantly of domes, ridges, and basins. On a more local scale, topographic features include slope failures, mounds, depressions, and scarps[4] (Roberts 2001). Such features

[3] Intraslope basins are flat, featureless areas on the continental slope of the northwestern GOM where sediment depositional processes predominate.

[4] Scarps (or escarpments) are steep bluff-like features formed by the downward displacement of sediments or rocks along a vertical fault plane.

produce a wide range of potential hazards to drill rigs, bottom-laid and buried pipelines, and production platforms. The most topographically rugged province in the region is the Texas-Louisiana Slope, a 120,000- km^2 (46,300-mi^2) area of banks, knolls, basins, and domes where local slope gradients can exceed 20°. Topographic variability in this area is attributed to the movement of salt in the subsurface and the natural venting and seepage of petroleum and other fluids at the seafloor surface (Roberts et al. 2005; Bryant and Lui 2000; Kennicutt and Brooks 1990; Roberts et al. 1998).

Substrate types range from lithified (rock-like) hard bottoms[5] (bioherms, hardgrounds, carbonate banks, and outcrops) to extremely soft, fluid mud bottoms. Hard-bottom substrates are associated with topographic highs (most often created by salt diapirs) and present hazards to activities such as drilling, locating production platforms, and laying pipelines. The coral reefs of the Flower Garden Banks in the northwestern GOM are an example (Roberts et al. 2005; Roberts and Aharon 1994; Schmahl et al. 2011; see also Sections 3.7.2.1.2 and 3.9.1.2.1).

Bedforms and Bedform Migration. Bedforms are depositional features on the seabed that form by the movement of sediment caused by bottom currents. An extensive field of bedforms, ranging in size from small ripples and mudwaves to large furrows, is present at the base of the continental slope (along the Sigsbee Escarpment) in the GOM (Bean 2005; Bryant and Liu 2000). Large bedforms and their migration create potential navigation hazards and may undermine submarine pipelines. Numerous studies of these features relate their morphology and migration to water depth, availability of sediment, grain size, and current velocity (Whitmeyer and FitzGerald 2008).

Deep tow surveys conducted by Texas A&M University have found that the 30-m (98-ft) wide and 10-m (32-ft) deep furrows to the south of the Sigsbee Escarpment parallel the regional contours and extend for tens to hundreds of kilometers. These features indicate the long-term presence of high-velocity bottom currents along the base of the escarpment (Bryant and Liu 2000). Bean (2005) estimates current velocities in this region to be as high as 95 cm/s (37 in./s), significant enough to affect structures on the seafloor or in the water column. The bedforms have steep upstream-facing sides (where deposition takes place), suggesting they migrate in an upcurrent direction (Bean 2005).

Bottom Scour. Vigorous tidal circulation and storm waves have an important effect on the transport of sediments on the surface of the continental shelf. Episodic sediment movement caused by waves and ocean currents can undermine foundational structures and move unanchored bottom-laid pipelines (as reported by Thompson et al. 2005 and Coyne and Dollar 2005). Teague et al. (2006) estimate that in 2004 Hurricane Ivan displaced as much as 100 million m^3 (3.5 billion ft^3) of sediment from a 35 by 15 km (22 by 9 mi) region in the storm's path, causing up to 36 cm (14 in.) of scour at moorings in areas over which the maximum wind stress occurred. Bottom scour occurs as a result of sediment resuspension by

[5] Hard bottoms formed on diapiric high areas beyond the shelf edge during periods of lowered sea level in the late Pleistocene. During this time, the areas provided a substrate for the colonization of sedentary marine organisms. As sea level rose, the remains of the colonized organisms in these areas became fossilized, forming bioherms (e.g., fossilized coral reefs) and shallow banks (Robert et al. 2005).

waves and current-driven transport of entrained sediments. Sediments entrained in bottom currents increase water density and mass, giving the strength to cause further scouring. In addition, wind-generated surface waves apply cyclic pressure to bottom sediments causing seabed motion (liquefaction).

Fluid and Gas Expulsion. There are a wide range of natural fluid and gas[6] expulsion processes in seafloor sediments across the northern GOM continental slope. The geologic features related to these processes are variable and depend largely on the rate and duration of delivery as well as the composition of the fluid and gas expelled (Hardage 2011; Roberts 2001a). These include mud volcanoes, flows, and vents, resulting from rapid-flux or mud-prone processes; gas hydrate mounds and chemosynthetic communities, resulting from moderate-flux processes; and hard bottoms (carbonate mounds, hardgrounds, and nodular masses), resulting from slow-flux or mineral-prone processes (Roberts 2001a, 2002). Below water depths of about 500 m (1,640 ft), moderate-flux processes dominate, promoting gas hydrate formation at or near the seafloor and creating conditions optimal for sustaining dense and diverse chemosynthetic communities. Rapid- and slow-flux processes may also occur on a more local scale at these depths (Roberts 2002). Pockmarks — circular to oval depressions resulting from the removal of sediment near areas of rapid (and possibly explosive) gas expulsion — have been mapped along the northern continental shelf and slope. Some of these features are over 300 m (1,000 ft) in diameter (BOEMRE 2011n).

The main geologic hazard stemming from the processes of fluid and gas expulsion (seeps and eruptions) is seabed slope failure (submarine slumps and slides), especially on the continental slope and within active river deltas and submarine canyons. Fluid and gas releases lower sediment shear strengths and as a result can destabilize seabed structures such as cables, pipelines, and platforms.

Studies using high-resolution seismic and side-scan sonar have shown that the linear spatial distribution of seafloor features caused by fluid and gas expulsion can usually be correlated with faults intersecting the modern seafloor. Faults are important conduits for the upward natural migration of fluids and gases through the sedimentary column to the seafloor (Roberts 2001b). Neurater and Bryant (1990) report that it is the churning action of upwelling fluids and gases that causes a “slurry” of unconsolidated mud to form and migrate to the surface of the seafloor.

Along the Texas-Louisiana Shelf, shallow gas accumulations are most common in old channel systems. Shallow gas accumulations are also found in areas affected by salt uplift where numerous faults form pathways to near-surface sediments, creating small gas pockets that become sealed in thin clay layers (Foote and Martin 1981).

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[6] Gases (predominantly methane) migrating from the seabed originate from both deep sources (termed thermogenic gases because they are heat-generated) and more shallow sources (termed biogenic or microbial gases because they are derived from the activity of microorganisms). Regardless of origin, high-pressure methane is highly mobile, flammable, and buoyant and poses a great hazard to drilling operations when encountered (Judd and Hovland 2007).

Natural Gas Hydrates. Gas hydrates are naturally occurring solids composed of hydrogen-bonded water lattices (also known as clathrates) that trap methane and other low-weight gas molecules (e.g., carbon dioxide, propane, and ethane). They form in deepwater ocean sediments within a surface-parallel layer referred to as the hydrate stability zone under conditions of high pressure and low temperature. In the GOM, gas hydrate deposits are found in localized deepwater areas at or near the seafloor (intersecting the seafloor at a water depth of about 500 m, or 1,640 ft). They occur as a disseminated accumulation in the pore spaces of sedimentary units across vertical sections ranging in thickness from a few centimeters to several hundred meters. In more massive form, they occur in faults, fractures, and nodules and range in thickness from a few centimeters to several hundred meters. The size and shape of the hydrate stability zone are influenced by the presence of numerous salt features (Boatman and Peterson 2000; Roberts 2001b; MMS 2006a; Frye 2008).

Because they are pressure- and temperature-sensitive, gas hydrates (if present) can easily dissociate and rapidly release large amounts of gas during a drilling operation. Hydrate dissociation may trigger seafloor slumps and catastrophic landslides, which pose significant hazards for offshore oil and gas operations, including the loss of support for drilling and production platforms and pipelines, collapse of wellbore casings, and seafloor subsidence around wellbores where gas has leaked to the surface. As drilling operations in the GOM move into deeper waters, gas hydrate outcrops are likely to be encountered more frequently (Boatman and Peterson 2000; Roberts 2001b; MMS 2006a).

In addition to their natural occurrence in sediments, gas hydrates may also form on drilling equipment and in pipelines in deep water, trapping methane and other gas molecules and posing hazards such as drilling difficulties, blockages and pressure buildup in valves and pipelines, and an increased risk of well control loss (Boatman and Peterson 2000).

Shallow Water Flow. Shallow water flow is a deepwater drilling hazard that occurs when overpressured, unconsolidated sands are encountered at shallow depths, 460 to 2,100 m (1,500 to 7,000 ft) below the seabed (Huffman and Castagna 2001). When encountered, these sands are prone to uncontrolled flow, potentially damaging the well and causing well casing failure — which could result in the loss of the well.[7] In extreme cases, overpressured sands have been known to erupt, creating seafloor craters (due to collapse), mounds, and cracks. Shallow water flow sands are difficult to detect seismically because there is little contrast in acoustic impedance at sand/shale interfaces at shallow depths (Lu et al. 2005; Ostermeier et al. 2002); however, some investigators are having success using high-resolution multi-component seismic data to delineate anomalies to identify zones that might produce shallow water flow (e.g., Hoffman and Castagna 2001).

Slope Failure. Submarine slope failures result from processes that reduce the shear strength of sediment on submarine slopes and/or increase the main driving force (gravity) that promotes the downslope movement of sediments. Hance (2003) summarizes the published literature on submarine slope failure and identifies 14 triggering mechanisms, a subset of which

[7] Shallow water flow is estimated to have occurred in about 70% of all deepwater wells (Hoffman and Castagna 2001).

is relevant to the GOM shelf and slope: (1) sedimentation processes that involve rapid deposition, especially in offshore delta areas and at the base of submarine canyons; (2) increased fluid pressures resulting from the disassociation of gas hydrates and the release and accumulation of free gas; (3) ocean storm waves and subsurface current (internal) waves; (4) tidal events, especially along coastlines; (5) human activities such as construction and dredging, usually along coastlines; (6) salt diapirism, which oversteepens soils on the flanks of diapirs; (7) mud-related volcanic activity; and (8) sediment creep, a process involving the slow movement of large masses of sediment.

Mudflows occur within well-defined gullies along the submerged portion of the Mississippi Delta, creating unstable conditions vulnerable to failure. Areas between the mudflow gullies have lower sedimentation rates and are considered to be generally stable. Active deposition takes place downslope of the gullies. Damage to pipelines and production facilities due to mudflow overruns has been documented in this region (Hitchcock et al. 2010). Other forms of sediment instability along the delta front include collapse depressions, submarine landslides, and shelf-edge slumps (Coleman et al. 1991; Coleman and Prior 1988).

Nodine et al. (2006) also reported pipeline damage by mudslides within (and confined to) the mudflow lobes along the delta front during Hurricane Ivan in 2004.

Faulting. Faulting occurs on a range of scales within the GOM continental shelf and slope, from major growth faults[8] that cut across thousands of meters of sedimentary section to much smaller faults related primarily to salt movement in the shallow subsurface. Vertical offsets along faults create steep scarps on the seafloor, leading to various forms of subaqueous mass movement (falls, slides or slumps, flows, and turbidity flow) that contributes to the seafloor's irregular topography. Faults also provide pathways for the upward migration and expulsion of fluids and gas at the seafloor surface (Roberts 2001b; Coleman and Prior 1988).

Active faults could pose a hazard to oil and gas activities in areas of rapid deposition and subsidence (such as the Mississippi Delta), especially in areas where formation fluids such as water and oil are withdrawn. In the GOM, fault activity is thought to be most prevalent on steep slopes at the shelf edge where sediment accumulation creates loading stress that is periodically relieved by sudden faulting and associated with active salt diapirs on the upper slope (Foote and Martin 1981).

4.2.1.2 Alaska – Cook Inlet

The Cook Inlet Planning Area encompasses the lower half of Cook Inlet (referred to as lower Cook Inlet) and Shelikof Strait. The following descriptions of physiography, bathymetry,

[8] Growth faults are normal (extensional) faults that form at the same time massive volumes of sediments are accumulating within an area of high deposition, such as the Mississippi Delta. The fault plane is typically well-defined and is linear or concave and fairly steep. Growth faults exhibit greater offset with increasing depth and extend more than 150 m (500 ft) below the sea floor. They are most common on the outer shelf and upper slope where sediment accumulation and subsidence are greatest (Foote and Martin 1981; MMS 2006; Teague et al. 2006).

and geologic hazards address physiographic features and geologic processes throughout Cook Inlet (including the upper inlet) for completeness.

4.2.1.2.1 Physiography and Bathymetry. Cook Inlet is a northeast-trending, 350-km (220-mi) long tidal estuary on the south-central coast of Alaska. It is situated between the Kenai Peninsula and Alaska Peninsula and extends from Anchorage to the Gulf of Alaska (Figure 4.2.1-2). The inlet is composed of three distinct physiographic regions: the head, the upper inlet, and the lower inlet. The head region lies at the northernmost end of Cook Inlet and consists of two long and narrow bays: Knik and Turnagain Arms, both of which have extensive tidal marsh flats during low tide. Knik Arm begins at the confluence of the Knik and Matanuska Rivers, about 50 km (31 mi) inland; it ranges in width from about 2 to 10 km (1.2 to 6.2 mi). The Port of Anchorage is located on the southeast shore of Knik Arm, at the mouth of Ship Creek. Turnagain Arm extends about 75 km (47 mi) inland to the railroad depot at Portage; it ranges in width from about 2 to 26 km (1.2 to 16 mi). Fire Island is located at the midpoint between Knik and Turnagain Arms, just off the coast of Anchorage (Mulherin et al. 2001).

Upper Cook Inlet is about 95 km (59 mi) long and extends from Point Campbell to the East and West Forelands (Figures 4.2.1-2 and 4.2.1-3). It ranges in width from 20 to 30 km (12 to 19 mi) and narrows to 16 km (10 mi) between the Foreland peninsulas. Several shallow shoals occur in this region, including Middle Ground Shoal, just north of the Forelands and north of the inlet's midline; Beluga Shoal, due south of the mouth of Susitna River, at the inlet's midline; and Fire Island Shoal, due west of Fire Island. Water depths in upper Cook Inlet are generally less than 37 m (120 ft), with the greatest depths at Trading Bay, the largest bay in the upper inlet, just east of the mouth of McArthur River (Mulherin et al. 2001; ADNR 2009a).

Lower Cook Inlet is about 200 km (120 mi) long and lies between the Foreland peninsulas and the inlet's mouth, which opens to the Gulf of Alaska between Cape Douglas on the Alaska Peninsula and Cape Elizabeth on the Kenai Peninsula (Figures 4.2.1-2 and 4.2.1-4). There are several islands within the lower inlet, including Augustine Island, in Kamishak Bay; Chisik Island, at the mouth of Tuxedini Bay; and Kalgin Island, about 30 km (19 mi) south of the Forelands. The Barren Islands and Chugach Islands are located at the inlet's mouth. The bathymetry is characterized as having sloping sides forming a central depression (Cook Trough) that gradually deepens to the south and widens as it approaches the Cook Plateau near the mouth of the inlet. The depression bifurcates to the north into two channels, divided by a narrow shoal (Kalgin Platform) extending southward from Kalgin Island. The Cook Plateau lies between the lower end of the Cook Trough and the top of Cook Ramp, a gently sloping ramp delineating the sandy sediments to the north and muddy sands to the south. The Cook Plateau and parts of the Cook Ramp are covered by bedforms of various sizes. The ramp slopes from a water depth of about 70 m (230 ft) to about 120 to 130 m (390 to 430 ft) as it approaches the north end of the Shelikof Trough (Mulherin et al. 2001; ADNR 2009a; Bouma 1981; Bouma et al. 1978a).

The Chinitna Platform covers most of the western part of lower Cook Inlet (Figure 4.2.1-2). Its surface is smooth with numerous small topographic highs and lows. Most of the bottom is hard and covered by coarse-grained sediment and shells (although embayments

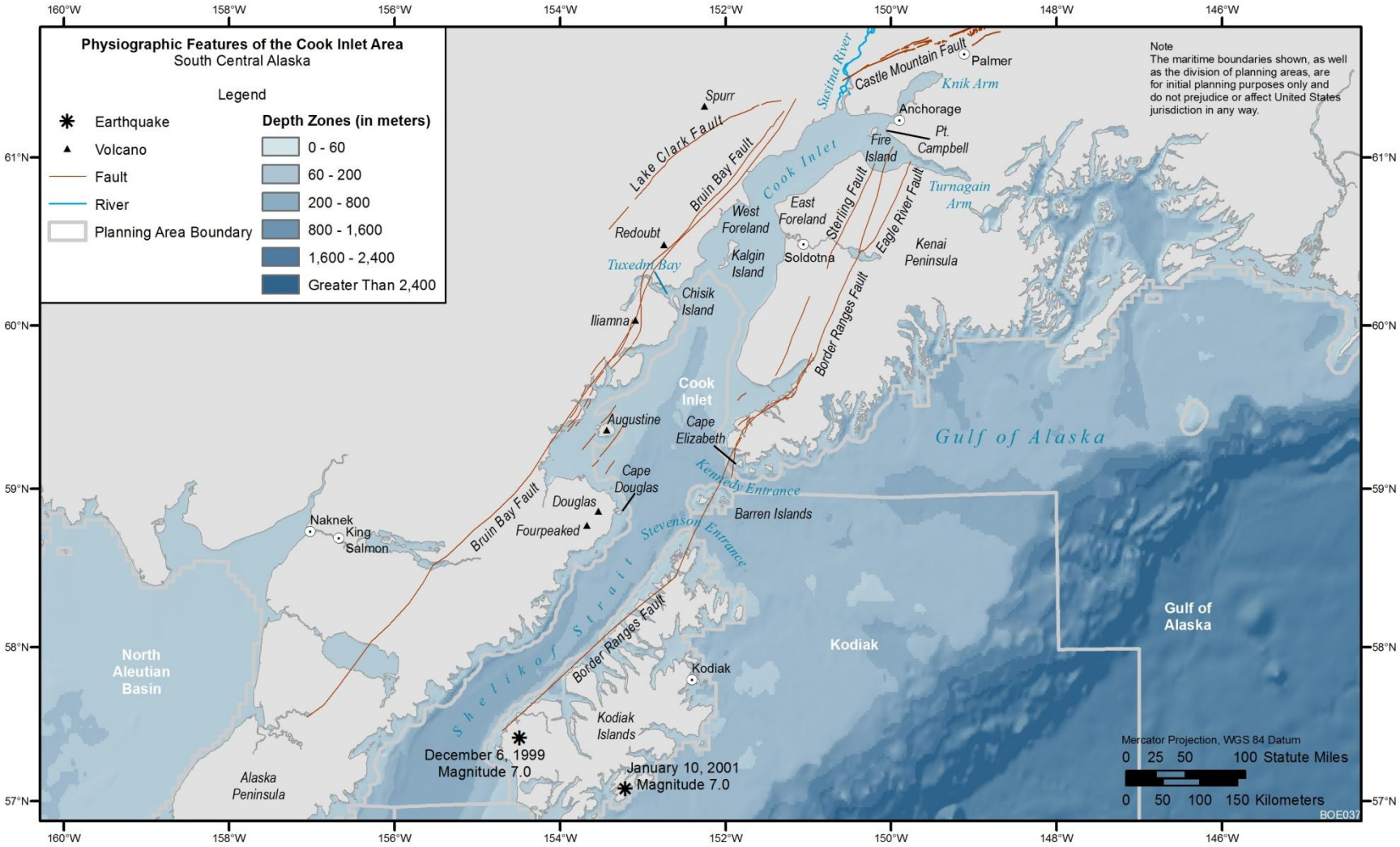

FIGURE 4.2.1-2 Physiographic Features of Cook Inlet (Earthquake data from USGS 2011a; map data for faults from Labay and Haeussler 2001; Troutman and Stanley 2003; and Clough 2011.)

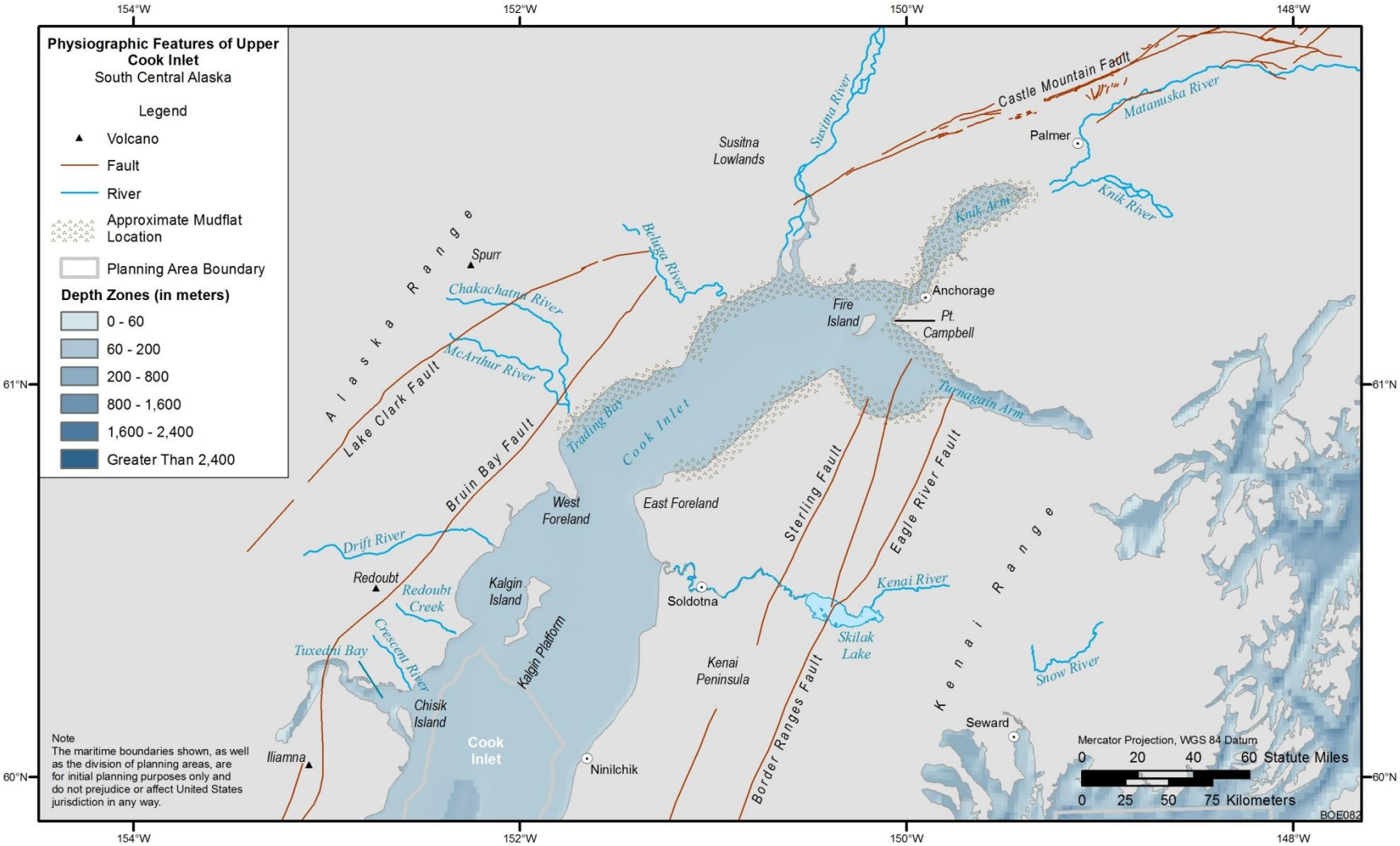

FIGURE 4.2.1-3 Upper Cook Inlet (Map data for faults from Labay and Haeussler 2001; Troutman and Stanley 2003; and Clough 2011; mudflat data from Mulherin et al. 2001.)

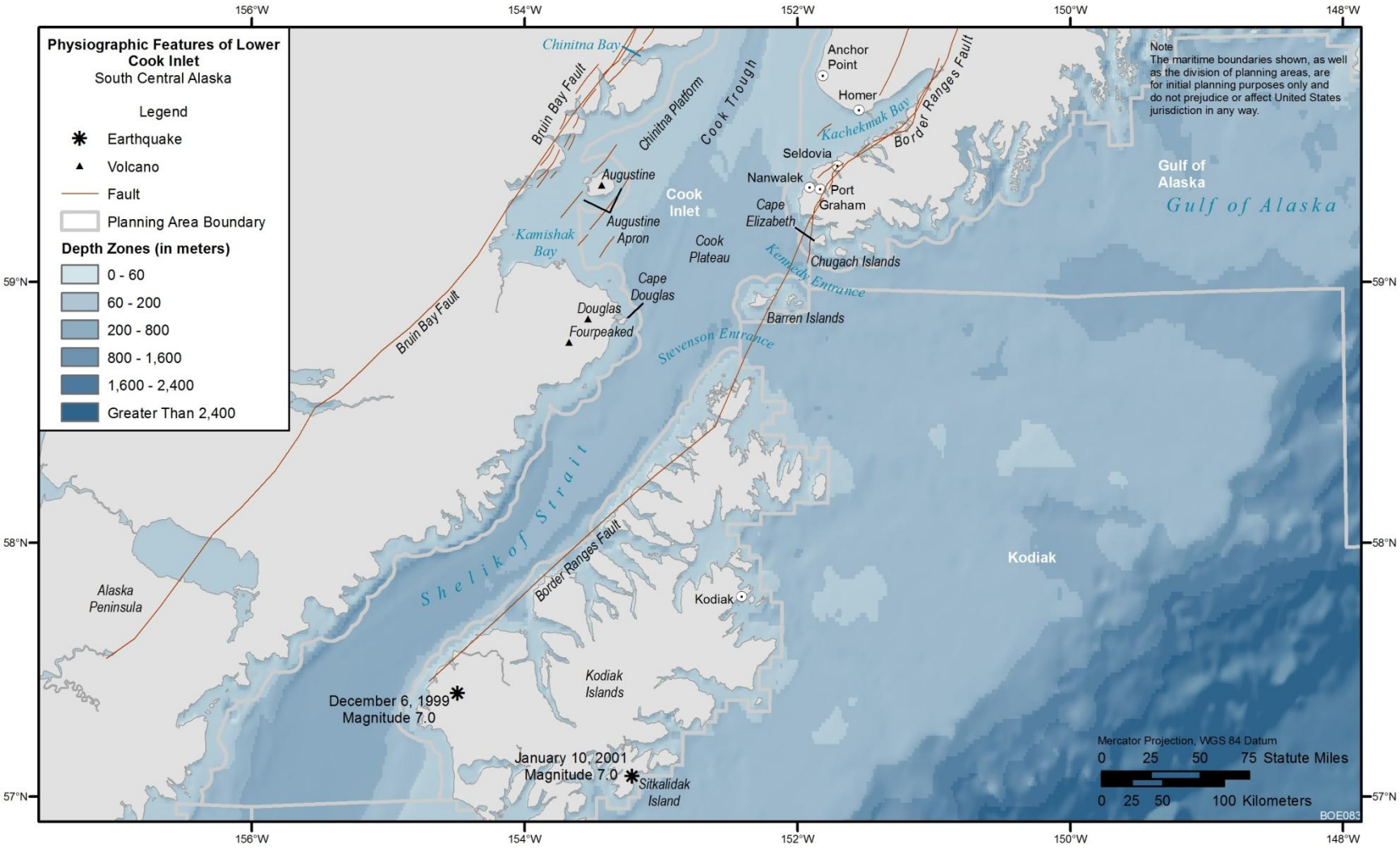

FIGURE 4.2.1-4 Lower Cook Inlet (Earthquake data from USGS 2011a; map data for faults from Labay and Haeussler 2001; Troutman and Stanley 2003; and Clough 2011.)

may have muddy bottoms). Augustine Island is located on the platform, and a shallow area, known as the Augustine Apron, encircles the island (Bouma 1981).

There are three entrances to the lower inlet from the Gulf of Alaska; these are the Kennedy and Stevenson Entrances on either side of the Barren Islands off the northeastern end of the Kodiak Islands and the opening of Shelikof Strait on the inlets' southwestern end.

Shelikof Strait lies between the Kodiak Island group and the Alaska Peninsula and also has a northeast orientation (Figure 4.2.1-2). The strait is about 200 km (120 mi) long, with an average width of about 45 km (27 mi). The seafloor in this region consists of a flat, central platform (coinciding with the Shelikof Trough) that slopes gently to the southwest. The platform is flanked by narrow marginal channels than run alongside the Kodiak Islands and the Alaska Peninsula. Relief on the platform and within the marginal channels can be as high as 100 m (330 ft) locally. Water depths in Shelikof Strait increase gradually in a southwestward direction, ranging from about 80 m (260 ft) at the mouth of Cook Inlet to more than 300 m (980 ft) off the west end of the Kodiak Islands (Hampton et al. 1978; Bouma 1981; Hampton et al. 1981). Deep subsurface faults (offsetting rocks of Tertiary age or older) occur along the margins of Shelikof Strait and run parallel to the shorelines of Kodiak Island and the Alaska Peninsula. Shallow faults are more recently active and occur throughout the strait — along its margins, as growth faults, and in association with structural highs (horsts or remnant volcanic necks) — and trend predominantly to the northeast (Hoose and Whitney 1980).

4.2.1.2.2 Geologic Hazards. Several types of geologic hazards are known to occur in the marine environment of Cook Inlet and Shelikof Strait and may present a risk to offshore oil and gas activities because they are dangerous to navigation or potentially damaging to marine structures. The potential geologic hazards in Cook Inlet and Shelikof Strait, except for sea ice, which is addressed in Section 4.2.2.1.1, are described below.

Seafloor Instability. The generally shallow nature and large tidal range of Cook Inlet (9 m [30 ft]) produce rapid currents. The Coriolis effect is also pronounced at this latitude, and during peak flow, all these factors combine to create strong cross-currents and considerable turbulence (strong currents and turbulence are also generated as tides flow through the constricted Forelands area). High current velocities and turbulence keep fine sediments (silt and clay) in suspension, so they are transported far from their source in the head region — the Susitna and Knik Rivers — and then back again with the incoming tide. As a result, bottom sediments throughout most of the inlet are predominantly coarse-grained (cobbles, pebbles, and sand) with only minor amounts of silt and clay. Grain size distribution in the inlet, which reflects the type and energy of transportation during the tidal cycle, is as follows: (1) sand, in the head region to the east of the Susitna River; (2) sandy-gravel and gravel, in the upper inlet and the upper part of the lower inlet (to Chinitna Bay); and (3) gravelly sand with minor silt and clay, in the lower inlet as far as the Barren Islands (Sharma and Burrell 1970).

MMS (1995a) concluded that the bottom sediments in Cook Inlet provide a stable substrate with no unusual geotechnical issues. This conclusion was based on the nature of bottom sediments in Cook Inlet (mainly coarse-grained), the low rate of sediment accumulation,

and the low relief of the seafloor. Previous studies found no areas of soft, unconsolidated sediments or evidence of failed or unstable slopes.[9]

Bedforms and Bedform Migration. Bedforms are depositional features on the seabed that form by the movement of sediment by strong bottom currents. Bedforms are common in Cook Inlet and occur as sand waves, dunes, sand ribbons, sand ridges, and megaripples with wavelengths ranging from 50 to 800 m (160 to 2,600 ft) and heights from 2.0 to 14 m (6.6 to 46 ft). The type of bedform occurring at a given location depends on factors such as sediment size and availability, water depth, and current velocity (Hampton 1982a). Bedform migration and the strong bottom currents that cause it are known to be hazardous to offshore operations in upper Cook Inlet because they undermine or bury bottom-founded structures such as anchors and pipelines (Bouma et al. 1978b; Bouma and Hampton 1986; Whitney et al. 1979; Bartsch-Winkler 1982). Several pipeline failures in Cook Inlet have been attributed to sediment movement that results from current-sediment interaction (ADNR 2009a).

The largest bedform fields in lower Cook Inlet occur in its central and southern parts (especially on Cook Plateau and Cook Ramp) where bottom current velocities may be as high as 50 cm/s (20 in./s) (Whitney and Thurston 1977; Bouma et al. 1978b; Bouma 1981). Studies conducted in the lower inlet indicate sand grains move mainly during storm events and in response to ebb and flood cycles, especially during spring tide (Bouma and Hampton 1986).

Shallow Gas. Shallow gas is a hazard to drilling operations when encountered because it increases the potential for loss of well control. Shallow gas-charged sediments[10] have been documented in Cook Inlet, and loss of well control incidents have occurred at the Steelhead platform (well M-26; 1987–1988) and Grayling platform (well G-10RD; 1985) in upper Cook Inlet north of the West Foreland. The incident at the Grayling platform stopped on its own as a result of well bore collapse that naturally sealed off the escaping fluids and gases. At the Steelhead platform, however, some injuries to workers and damage to the platform occurred as a result of escaping gases that caught fire (ADNR 2009a).

Whitney and Thurston (1981) delineated shallow gas-charged sediment areas at depths of less than 50 m (160 ft) below the seafloor in lower Cook Inlet based on high-resolution seismic profiles. The areas occur to the west of the Barren Islands between bathymetric contours 150 km and 180 km (93 mi and 110 mi) and to the southeast of Augustine Island between bathymetric

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9 Studies of sediments in the head region (at the northernmost end of Cook Inlet), however, do indicate soft sediments (e.g., in Knik Arm) that have unstable banks and bottoms and a high liquefaction potential. Surface bedforms are common features in these sediments (Bartsch-Winkler 1982).

10 Natural gas (predominantly methane) in Cook Inlet sediments likely originates from the decay of trapped organic matter in recent sediments and seepage from deeper sources, as reported by Molnia et al. (1979) for the Gulf of Alaska. Gas from deeper sources in the Cook Inlet basin has two types of occurrences: (1) the shallow reserves of biogenic gas in the Sterling, Beluga, and upper Tyonek Formations of the nonmarine Kenai Group of Tertiary age, at depths less than 2,300 m (7,500 ft); and (2) the oil-associated (thermogenic) gas in the lower Tyonek Formation, the Hemlock Conglomerate, and the West Foreland Formation at the base of the Tertiary section, having migrated from underlying marine source rocks of Jurassic age (Claypool et al. 1980). Regardless of origin, high-pressure methane is highly mobile, flammable, and buoyant and poses a great hazard to drilling operations when encountered (Judd and Hovland 2007).

contours 20 km and 100 km (12 mi and 62 mi) (Whitney and Thurston 1981). Although areas of gas-charged sediments can be identified in high-resolution marine seismic data, the concentrations of gas in sediments are highly variable over small lateral and vertical distances (Hampton 1982b).

Hoose and Whitney (1980) mapped possible gas-charged sediments in the shallow subsurface at the northeast end of Shelikof Strait (also based on high-resolution marine seismic data).

Seismicity. Seismicity in the Cook Inlet region is related to movement along the Alaska-Aleutian megathrust fault as the northwestward-moving Pacific plate subducts into the mantle beneath the North American plate (Figure 4.2.1-5). Shallow crustal earthquakes are generated as a result of deformation of the overriding North American plate; deeper earthquakes occur along the interface of the plates (Benioff Zone) that extends from the trench to depths of 40 to 60 km (25 to 37 mi), deepening to the northwest. Within the subducting Pacific plate, earthquakes can be as deep as 300 km (186 mi) (Rhea et al. 2010).

Major fault systems occur along the margins of the Cook Inlet basin. They include the Castle Mountain, Lake Clark, and Bruin Bay Faults, located to the north and northwest; and the Border Ranges Fault, on the Kenai Peninsula to the southeast (Figure 4.2.1-2). The faults have a northeast strike and are among the largest strike-slip fault systems in Alaska. Of these, only the Castle Mountain Fault has been active in recent times (with several earthquakes with an inferred M_W of 7.1 occurring in the past 4,100 years along the southern slopes of the Talkeetna Mountains) (Labay and Haeussler 2001; Haeussler et al. 2000). There is no evidence of recent or Quaternary movement along the Lake Clark or Bruin faults. Haessler and Saltus (2004) identified a 26-km (16-mi) right-lateral offset on the Lake Clark Fault that likely occurred in the past 34 to 39 million years (Late Eocene), based on aeromagnetic data. The most recent activity on the Border Ranges fault system likely occurred less than 24 million years ago (Neogene); some investigators suggest activity may have been as recent as several thousand years ago (Stevens and Craw 2004).

The highest magnitude earthquakes in Alaska are associated with the Alaska-Aleutian megathrust zone and are common in the Aleutian Islands, the Alaska Peninsula, and the Gulf of Alaska. Since 1900, six earthquakes over magnitude 8.4 have occurred in these regions (some of which predate oil and gas activities in Cook Inlet) (Rhea et al. 2010).

Since 1973, more than 1,200 earthquakes have been recorded in the Cook Inlet region (USGS 2011a). Of these, 10 had magnitudes greater than 6.0. The two largest earthquakes occurred in 1999 and 2001 and were located on Kodiak and Sitkalidak Islands (Figure 4.2.1-2). Each earthquake registered a moment magnitude (M_W)[11] of 7.0 (Figure 4.2.1-2).

[11] Moment magnitude (M_W) is used for earthquakes with magnitudes greater than 3.5 and is based on the moment of the earthquake, equal to the rigidity of the earth times the average amount of slip on the fault times the amount of fault area that slipped. Moment magnitude is the preferred magnitude for all earthquakes listed in USGS databases. It replaces the more general usage of "M," which is used to describe historical earthquakes in the literature. An "M" denotes a magnitude consistent with the Richter scale (USGS 2010).

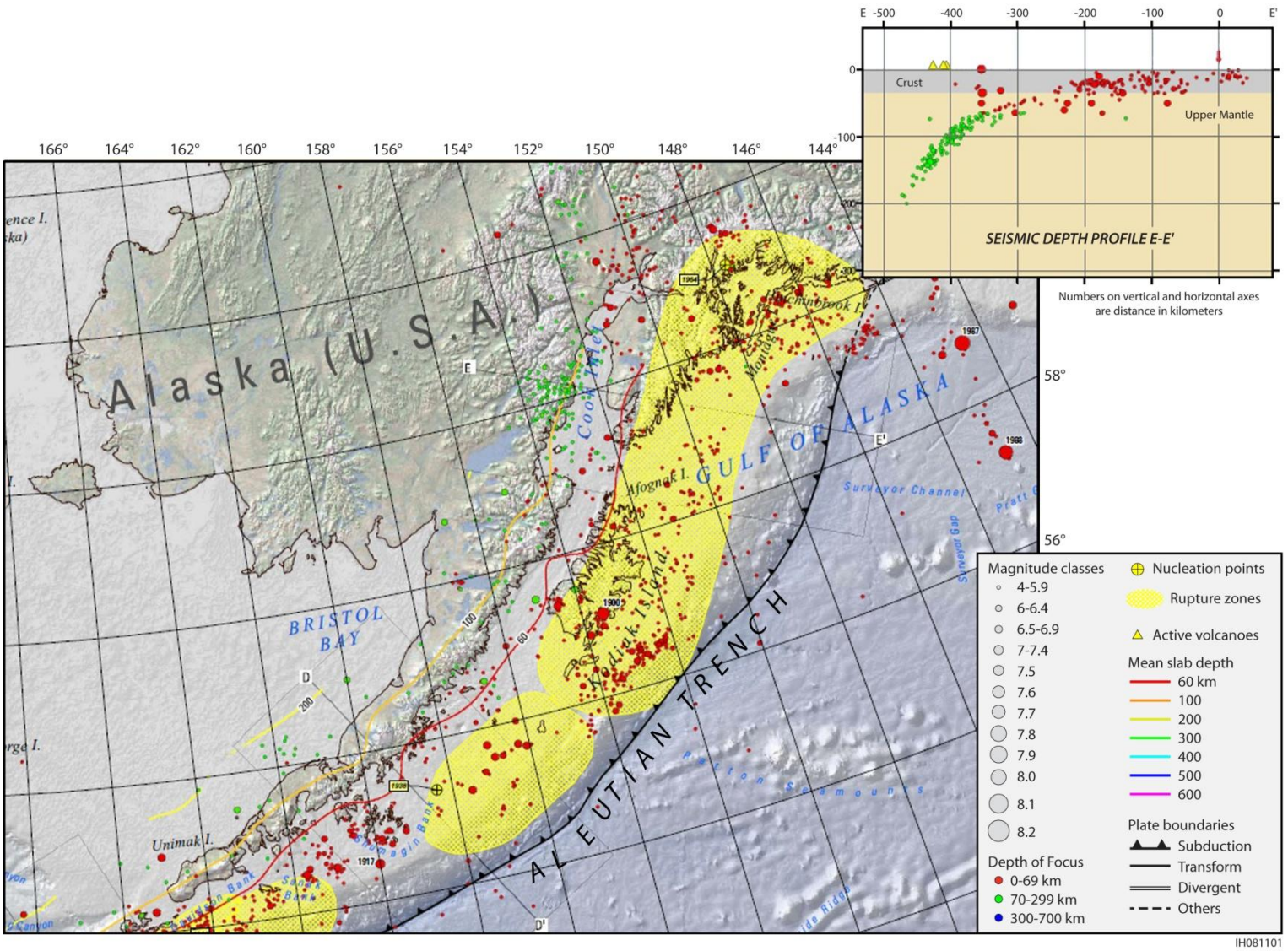

FIGURE 4.2.1-5 The Alaska-Aleutian Megathrust Fault and Subduction Zone (Aleutian Trench) with Seismicity Depth Profile across Cook Inlet (Rhea et al. 2010)

Earthquakes greater than M 6.0 pose a risk to the Cook Inlet region by triggering floods and landslides. Earthquakes greater than M 7.0 may trigger a tsunami and cause emergency events such as fires, explosions, and hazardous material spills and a disruption of vital services (water, sewer, power, gas, and transportation).

Cook Inlet lies within an area where the peak horizontal accelerations of 0.30 and 0.40 g have a 10% probability of exceedance in 50 years (USGS 1999). Shaking associated with this level of acceleration is generally perceived as very strong to severe, and the potential for damage to structures is moderate to heavy (Wald et al. 2005). Given the high intensity of ground shaking and the high incidence of historic seismicity in the Cook Inlet region (i.e., 1,200 earthquakes in the past 40 years with 10 exceeding M 6.0) the potential for liquefaction in inlet sediments is also likely to be high, but only in areas like the head region and upper inlet where sediments are composed of glacial silt and fine sands, as demonstrated by the widespread liquefaction documented in Turnagain Arm during the Great Alaska Earthquake of 1964. Areas like the OCS where bottom sediments are more coarse-grained are not likely to be affected (Greb and Archer 2007).

Volcanic Activity. There are four monitored volcanoes located in the Cook Inlet region (from north to south): Spurr, Redoubt, Iliamna, and Augustine (Figure 4.2.1-2; Table 4.2.1-1). These volcanoes are part of the Aleutian Island Arc, a chain of volcanoes extending from south central Alaska to the far western tip of the Aleutian Islands. Three of these volcanoes (Spurr, Redoubt, and Iliamna) are located to the west of Cook Inlet. Augustine is an island volcano in lower Cook Inlet; it is the most active volcano in the region. All but Iliamna have erupted several times in the past 150 to 200 years and may erupt again in the future (Waythomas et al. 1997; Waythomas and Waitt 1998). Because of their composition, volcanoes in the Cook Inlet region are prone to explosive eruptions. Hazards in the immediate vicinity of the eruption include volcanic ash fallout and ballistics, lahars (mudflows) and floods, pyroclastic flows and surges, debris avalanches, directed blasts, and volcanic gases. Lease areas in Cook Inlet would be out of the range of most of these eruption hazards except during very large eruptions (on the scale of the 1980 Mount St. Helens eruption), which tend to be rare events (Combellick et al. 1995; ADNR 2009a). Ash fall associated with the 2009 eruption of Redoubt forced the temporary closure of the Anchorage Airport (ADN 2009); however, there were no reports that it affected oil and gas operations or damaged infrastructure within or around Cook Inlet.

Drainages with headwaters near the three onshore Cook Inlet volcanoes are susceptible to lahars (mudflows) and floods during volcanic eruptions due to the permanent snow and ice stored in snowfields and glaciers on the upper flanks of the volcanoes that can generate flooding upon melting. For example, the Redoubt eruption that occurred in 1989–1990 caused significant melting of the Drift Glacier, generating lahars that inundated the Drift River valley and threatened the Drift River Oil Terminal. Oil storage tanks were damaged (although the tanks did not rupture) and loading operations at the terminal (and associated pipeline and platform services) were interrupted for several months, but resumed once a protective dike was installed around the tank farm and support facilities. The interruption in operations at the terminal caused a significant financial impact to the area (Waythomas et al. 1997; ADNR 2009a; KPB 2011). Drainages vulnerable to volcanically induced floods are the Chakachatna River drainage (from

TABLE 4.2.1-1 Monitored Volcanoes near Cook Inlet[a]

Volcano	Description/Location	Historical Eruptions	Potential Hazards
Mount Spurr	Ice- and snow-covered stratovolcano on the west side of Cook Inlet, about 120 km (75 mi) west of Anchorage. Peak; elevation is 3,374 m (11,070 ft).	1953 and 1992 (Crater Peak flank vent about 3.5 km [2 mi] south of summit).	Ash clouds, ash fall and bombs, pyroclastic flows and surges, and mudflows (lahars) that could inundate drainages on all sides of the volcano, but primarily on south and east flanks. Eruptions at the Crater Peak vent were brief and explosive, producing columns of ash.
Redoubt	Stratovolcano on the west side of Cook Inlet, about 170 km (106 mi) southwest of Anchorage. Peak elevation is 3,108 m (10,197 ft).	1902, 1966–1968, 1989–1990, and 2009.	Ash clouds, ash fall and bombs, pyroclastic flows and surges, debris avalanches, directed blasts, volcanic gases, tsunamis, and mudflows (lahars) and floods that could inundate drainages on all sides of the volcano, primarily on the north flank. The 1989–1990 eruption produced a lahar that traveled down the Drift River and partially flooded the Drift River Oil Terminal facility. Significant ash plume. Ash fall from the 2009 eruption forced the airport in Anchorage to close temporarily (ADN 2009); there were no reports of damage to oil and gas operations in Cook Inlet. Tephra from future eruptions could travel several hundred kilometers from the volcano (carried by prevailing winds to the northeast).
Iliamna	Ice- and snow-covered stratovolcano on the west side of lower Cook Inlet, about 225 km (140 mi) southwest of Anchorage and 113 km (70 mi) southwest of Homer. Peak elevation is 3,053 m (10,016 ft).	No historical activity.	Ash clouds, ash fall and bombs, pyroclastic flows and surges, debris avalanches, and mudflows (lahars) and floods that could inundate drainages on all sides of the volcano.
Augustine	Island stratovolcano in lower Cook Inlet, about 290 km (180 mi) southwest of Anchorage and 120 km (75 mi) southwest of Homer. Peak elevation is 1,260 m (4,134 ft).	Most active volcano in region with significant eruptions in 1812, 1883, 1908, 1935, 1963–1964, 1976, 1986, and 2006.	Ash clouds, ash fall and volcanic bombs, pyroclastic flows and surges, debris avalanches, directed blasts, mudflows (lahars) and floods, volcanic gases, tsunamis, and lava flows. A large avalanche on the volcano's north flank during the 1883 eruption flowed into Cook Inlet and may have initiated a tsunami at Nanwalek, about 90 km (56 mi) to the east.

[a] Volcanoes listed are monitored by the Alaska Volcano Observatory in Anchorage. Other volcanoes in the region west of Cook Inlet include Hayes and Double Glacier. The Hayes volcano is a stratovolcano remnant, almost completely ice-covered; no fumeroles have been observed. Most recent eruptions were more than 3,000 years ago. The Double Glacier volcano is a dome remnant surrounded by the Double Glacier; it is considered to be inactive. There are also numerous unmonitored volcanoes (e.g., Mt. Douglas and Fourpeaked Mountain) on the Alaska Peninsula to the west of the Kodiak Islands.

Sources: USGS 2011b; Waythomas and Waitt 1998; Waythomas et al. 1997; Till et al. 1990.

Trading Bay to the McArthur River), the Drift River drainage (from Montana Bill Creek to Little Jack Slough), Redoubt Creek, and the Crescent River. The Drift and Chakachatna Rivers are the most likely to host such floods. Volcanogenic mudflows and floods could affect roads and onshore and offshore infrastructure such as pipelines (Combellick et al. 1995; ADNR 2009a).

Other (more distal) volcanic-related hazards include volcanic ash clouds and tsunamis. Volcanic ash is ejected high into the atmosphere and stratosphere by explosive eruptions and drifts downwind, eventually falling to the ground. Hazards related to ashfalls include damage to mechanical and electronic equipment (e.g., engines, computers, and transformers) and, in more rare events, building collapse. Volcanic ashfalls in Cook Inlet are typically less than a few millimeters in thickness and occur with an average frequency of a few every 10 to 20 years (Combellick et al. 1995; ADNR 2009a).

An eruption from Augustine volcano in 1883 caused a debris avalanche that entered Cook Inlet and initiated a tsunami that caused four 4.6 to 9.1 m (15 to 30 ft) waves to hit Nanwalek about 90 km (56 mi) to the east (Waythomas and Waitt 1998; KBP 2011). Waves of 4.6 m (15 ft) also reportedly struck Port Graham. Boats were swept into the harbor and several residences were flooded, but damage was minor because the tide was low at the time (KBP 2011). While the risk of coastal damage from locally generated tsunamis is potentially high, the probability of occurrence is low. The configuration of Cook Inlet and its narrow entrances reduce the likelihood that a tsunami generated outside the inlet would create a significant hazard (Bouma and Hampton 1986).

Flooding. The U.S. Geological Survey (USGS) reports that floods in the Cook Inlet drainage basin result from intense, warm rains originating in the Pacific Ocean. They are also caused by the release of water from glacier-dammed lakes or ice jams (and by tsunamis and seiches, discussed in the next section). Nearly all major floods occur between July and early October, but they can also occur during snowmelt season (May to June) if the snowpack is above average (Brabets et al. 1999).

Since streamflow monitoring began in the late 1940s, at least four major floods have occurred in the drainage basin, covering large areas of the basin and causing considerable property damage (Brabets et al. 1999):

- *May 1971*. Snow cover was greater than average along the Alaska Range, and below-normal air temperatures delayed snowmelt until July, creating conditions conducive to flooding. Inundated areas included northeast and west Anchorage and parts of the Susitna and Matanuska River basins.

- *October 1986*. A large Pacific storm system moved onshore over south central Alaska, causing record-setting rainfall that caused flooding in the lower Susitna River Valley, with recurrence intervals greater than 100 years.

- *August 1989*. Record rainfall caused several streams in the Anchorage area to exceed prior record peak discharges. The Knik River also recorded a peak discharge at a 100-year recurrence.

- *September 1995*. Remnants of a tropical storm caused flooding along the Skwentna River, the Knik River and tributaries, the Kenai River, and along Glacier Creeks (Girdwood). Several rivers discharging to Knik Arm had peak flows estimated to have been greater than the 100-year flood.

Other floods in the Cook Inlet drainage basin have occurred from glacier-dam outbursts that result when glacial movement opens a pathway for water trapped behind a glacier to be released. Rivers on the west side of the upper inlet are subject to outburst floods of great magnitude as a result of sudden drainage of large, glacier-dammed lakes; among these are the Beluga, Chakachatna, Middle, McArthur, Big, and Drift Rivers. One of the largest outburst floods occurred in 1969 (and again in 2007) when water released from glacier-dammed Skilak Lake lifted ice on the frozen river and severely scoured the river banks as a surge of water and large chunks of ice travelled downstream. Outburst floods also occur on the Kenai River (east of Cook Inlet) where a glacier-dammed lake at the headwaters of the Snow River fails every two to 2–5 years. Historically, the Knik River near Palmer (at the northernmost end of Cook Inlet) has flooded when glacier-dammed Lake George fails. Such floods occur more frequently in the fall and can be especially severe if the lakes or the Kenai River are already high or frozen (Brabets et al. 1999; Combellick et al. 1995; ADNR 2009a; KPB 2011).

Ice jam flooding occurs during the spring breakup process when strong ice or constrictions in a river (bends or obstructions like islands or gravel bars) create jam points that cause moving ice along the breakup front to stop (NOAA 2011a). It also occurs when low-density ice masses (frazil ice) become trapped and pile up under surface ice. The ice stoppage causes water levels to rise and flood the adjacent land. Ice jams are more often associated with single-channel rivers in interior and northern Alaska than in rivers of the Cook Inlet drainage basin, but a flood from an ice jam downstream of Skilak Lake in the Kenai River watershed (east of Cook Inlet) occurred in 1969 after an outburst from Skilak Glacier at the head of Skilak Lake, creating a record high river stage (74.25 m [22.63 ft]) and causing severe damage in Soldotna. Ice jams are unpredictable and have the potential to be worse than 100- or 500-year events, causing heavy damage to bridges, piers, levees, jetties, and other structures along the riverbank (Brabets et al. 1999; NOAA 2011a; ADNR 2009a; KPB 2011).

Hazards from flooding result from inundation, riverbank instability and erosion, high bedload transport, deposition at the river mouth, and channel modification and mainly affect onshore facilities (e.g., terminal facilities and pipelines) (ADNR 2009a). Assessing flood potential and community vulnerability is difficult because significant natural and man-made changes occur within floodplains over short time intervals. The KPB has begun Federal Emergency Management Agency (FEMA) flood insurance rate mapping updates, which are scheduled to be completed in late 2010. A vulnerability assessment to identify the population, property, and environment that may be exposed to flooding is also planned for Seward (KPB 2011).

Tsunamis and Seiches. A tsunami is a series of long ocean waves generated by the displacement of a large volume of water caused by earthquakes, volcanic eruptions, submarine landslides, or onshore landslides that rapidly release large volumes of debris into the water. Most tsunami waves affecting south central Alaska are generated along subduction zones

bordering the Pacific Ocean where motion along a dip-slip fault and the elastic rebound of subducting crust, produced by an earthquake of magnitude greater than 6.5 on the Richter scale, causes vertical displacement of the seafloor. The great seismicity associated with the subduction zone of the Aleutian-Alaskan megathrust fault system makes the southern coastal region of Alaska, especially the Gulf of Alaska and the Aleutian Islands, highly susceptible to tsunamis (Costello 1985).

Tsunamis are typically not hazardous to vessels and floating structures on the open ocean because of their small wave heights (less than a few feet). However, they are potentially very damaging to coastal regions and nearshore facilities because wave heights can increase significantly as tsunamis approach shallow water. High, breaking waves that reach the shoreline at high tide cause much more damage than waves that are low and nonbreaking or that occur at low tide (Combellick and Long 1983; MMS 1992).

Because of the shallow, elongated configuration of Cook Inlet and its narrow entrances, the hazard from distant tsunamis is low. The hazard from local tsunamis is also low because there are no active surface faults in the inlet, no adjacent steep slopes to serve as sources of massive slides into the inlet, and no evidence of thick, unstable seafloor deposits that could fail and create massive underwater slides. Local landslide-generated tsunamis, however, can be quite large and potentially damaging, as demonstrated by the series of 4.6 to 9.1 m (15 to 30 ft) waves that reportedly hit Nanwalek and Port Graham on the east side of lower Cook Inlet as a result of a debris avalanche caused by the eruption of Augustine volcano in 1883 (Waythomas and Waitt 1998; KBP 2011). Future eruptions of Augustine could potentially generate a tsunami in lower Cook Inlet if significant volumes of volcanic debris were to enter the sea rapidly (although this remains a topic of debate). Modeling studies indicate that a moderate wave is possible (with lead times of about 27 to 125 min), but the likelihood of a tsunami is considered to be low. None of the last five eruptions of Augustine volcano, including the latest one in 2006, resulted in a tsunami; nevertheless, the West Coast and Alaska Tsunami Warning Center and the Alaska Volcano Observatory continue to refine their public outreach strategy to deal with a volcanogenic tsunami because local consequences of such an event could be high (Neal et al. 2011; Waythomas and Waitt 1998; ADNR 2009a).

Seiches are periodic oscillations of standing waves in partially or completely enclosed water-filled basins like lakes, bays, or rivers triggered by changes in wind stress or atmospheric pressure and, less commonly, by landslides and earthquakes (McCulloch 1966). In Alaska, they may also be generated by the collapse of deltas into deep glacial lakes (KPB 2011). An example is the Lituya Bay earthquake of 1958 (M_w 8.2), which caused a landslide at the head of Lituya Bay (on the Gulf of Alaska) and generated a seiche with a wave run-up of about 530 m (1,750 ft) (MMS 1992; Bouma and Hampton 1986).

During the Great Alaska Earthquake of 1964 (M_w 9.2), tsunamis were generated by uplift of the seafloor and seiches were generated by landslides in semiconfined bays and inlets (USGS 2011b; MMS 1992). Because the Kenai Peninsula is susceptible to earthquakes with magnitudes greater than M 6.0, the Kenai Peninsula borough mitigation plan rates the coastal communities and facilities in lower Cook Inlet (south of the Forelands) as highly vulnerable to tsunamis — vulnerable communities include Port Graham, Nanwalek, Seldovia, Homer, Anchor

Point, and Ninilchik. The tsunami risk for upper Cook Inlet, however, is considered low because of its relatively shallow depth and its distance from the lower end of the inlet (KPB 2011).

4.2.1.3 Alaska – Arctic

4.2.1.3.1 Physiography and Bathymetry. The Arctic region is located along the arctic coastline of Alaska. It is composed of the Beaufort Sea, Chukchi Sea, and Hope Basin Planning Areas (Figure 4.2.1-6). The Beaufort Sea stretches from the Alaska-Yukon border westward to Point Barrow. Here, the continental shelf has very low relief (on average 1 m/km; Craig et al. 1985) and extends 60 to 120 km (37 to 75 mi) from shore to water depths of 60 to 70 m (200 to 230 ft). Large-scale physiographic features are rare on the shelf, although barrier islands (rising several meters above sea level) and shoals (rising 5 to 10 m [16 to 33 ft] above the seabed) occur in a chain on the inner shelf along the 20-m (66-ft) depth contour, parallel to the shoreline. These features are migrating to the west at rates of about 20 to 30 m (66 to 98 ft) each year (MMS 2008c). Beyond the shelf is the Alaska rise and slope, an area where gravity-driven slope failures greatly influence the seafloor morphology (Grantz et al. 1994).

The Chukchi Sea is a broad embayment of the Arctic Ocean. It lies to the west of the Beaufort Sea, between Point Barrow to the east and Cape Prince of Wales to the west (Figure 4.2.1-6). The continental shelf in this region has low relief and a gentle slope to the north. Water depths range from about 30 to 60 m (98 to 200 ft) on the shelf and drop sharply to greater than 3,000 m (9,800 ft) into the Arctic basin to the north and east. There are several shoals on the shelf. Two prominent shoals, Herald Shoal to the west and Hanna Shoal to the east (at depths less than 20 m [66 ft] below sea level), are separated by a broad area that is about 35 to 40 m (110 to 130 ft) deep with a central channel. Isolated shoals also occur in the nearshore region (along the north and west coasts) in water depths of 20 to 30 m (66 to 98 ft). Hope Basin, a broad and shallow valley with water depths of about 50 m (160 ft), is located to the southwest of Point Hope (MMS 2008c). The outer edge of the shelf is dissected by gullies and large erosional features (Phillips et al. 1988).

The Beaufort and Chukchi shelves are separated by the Barrow Sea Valley, a 200-km (120-mi) long, flat-bottomed basin incised by fluvial erosion during the Pleistocene epoch and interglacial marine currents (Figure 4.2.1-6). The valley ranges in depths from about 100 to 250 m (330 to 820 ft) (Craig et al. 1985; Phillips et al. 1988).

4.2.1.3.2 Geologic Hazards. Several types of geologic hazards are known to occur in the marine environment of the Beaufort and Chukchi Seas and may present a risk to offshore oil and gas activities because they are dangerous to navigation or potentially damaging to marine structures. The potential geologic hazards in the Arctic region, except for sea ice and permafrost, which are addressed in Section 4.2.2.1.2 and 4.2.2.2, are described below.

Offshore and Coastal Currents. Marine currents along the central Beaufort shelf are primarily wind-driven and are strongly regulated by the presence or absence of ice. Sediment is

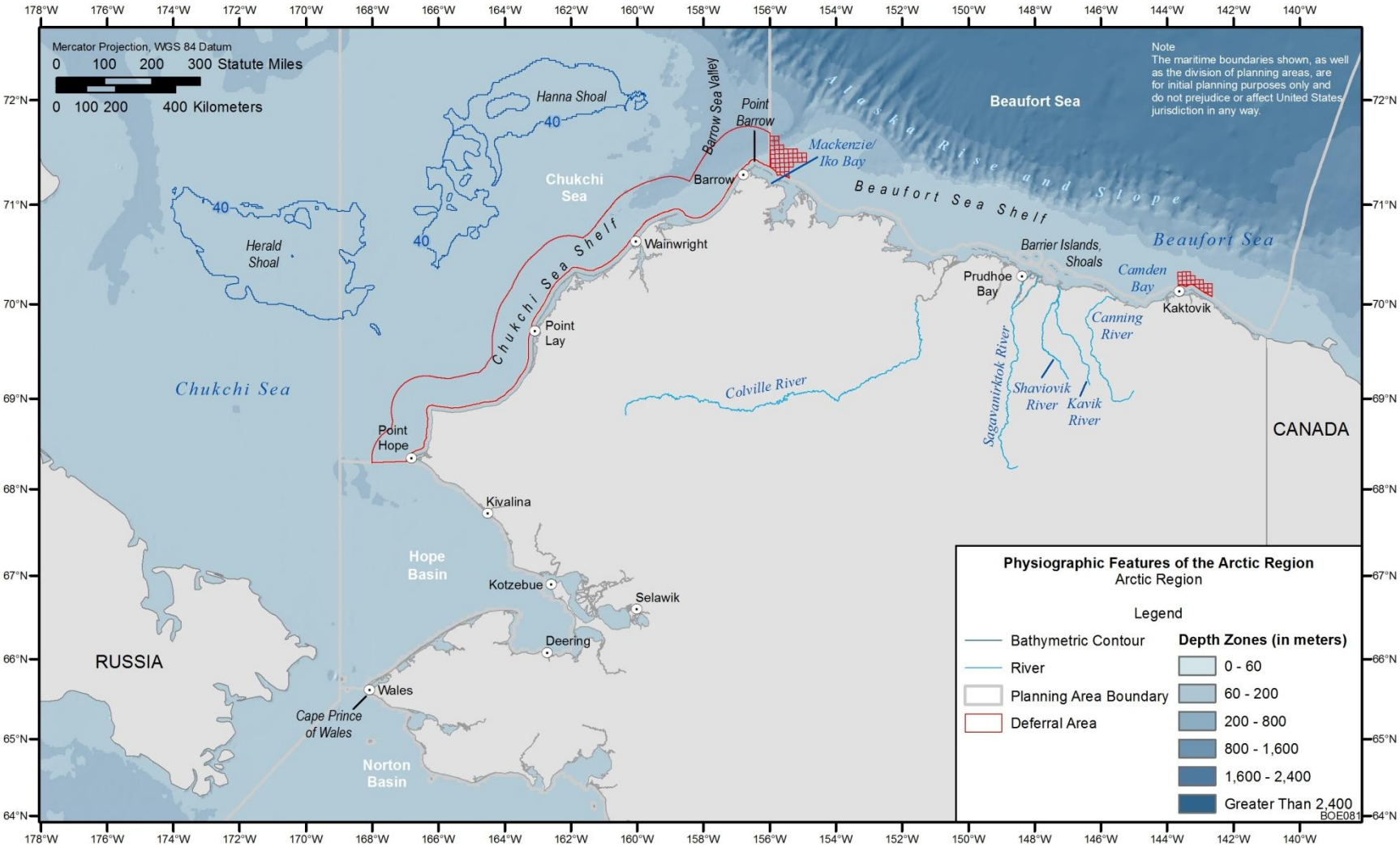

FIGURE 4.2.1-6 Physiographic Features of the Arctic Region

transported by these currents along the barrier islands and the coastal promontories, although, because of the short open water season, the annual rate of longshore sediment transport is relatively low. The currents along the inner shelf generally flow to the west in response to the prevailing northeast wind, with current reversals occurring close to shore during storms. Farther from the shoreline, on the open shelf, the currents average between 7 and 10 cm/s (2.8 to 3.9 in./s). During storms, east-flowing currents have been measured with velocities of up to 95 cm/s (37 in./s), although typical storm current velocities are an order of magnitude lower. Under the ice in the winter, the currents are usually less than 2 cm/s (0.79 in./s), although some currents have been measured at up to 25 cm/s (9.8 in./s) in areas around grounded ice blocks (Hopkins and Hartz 1978; ADNR 2009a).

Geostrophic currents occur on the outer shelf, flowing parallel to the shelf-slope break. These currents have been measured at velocities of up to 50 cm/s (20 in./s) and can travel in both easterly and westerly directions. Since the tidal range on the central Beaufort shelf is small, approximately 15 to 30 cm (5.9 to 12 in.), the tidal currents exert only minor influences on the sedimentary regime. When the water flow on the shelf is restricted by bottomfast ice, these currents can act as important scouring agents (Craig et al. 1985; ADNR 2009a).

Offshore structures must be designed to withstand strong marine currents, loading from ice forces, and severe storms in the Beaufort Sea. Production platforms will typically be bottom-founded (gravity base) to withstand conditions that change with the seasons. Drill ships for exploration are not bottom-founded; therefore, they can only operate in low ice cover conditions. Artificial or natural gravel islands must be fortified and built to withstand coastal currents as well as the forces of moving sea ice for the lifespan of the producing field. To this end, they may require periodic maintenance in response to heavy storms (ADNR 2009a).

Flooding. Floods due to seasonal snowmelt and ice jams occur annually along most of the rivers in the Arctic region and many of the adjacent low terraces. Spring ice breakup on rivers often occurs over the first few days of a three-week period of flooding in late May through early June. Up to 80% of the flow occurs during this period. The impact of flooding is in large part related to the magnitude and timing of seasonal ice breakup. The formation of ice jams is especially associated with catastrophic flooding. Some of the most damaging floods are associated with an above-average snowpack that is melted by rainstorms and sudden warming (ADNR 2009a).

Significant bank erosion may occur during flooding, depending on the amount of water and its level with respect to the river bank and the nature of the sediment (or ice) load. Ice carried along by rivers can produce significant erosion, especially if breakup occurs during a low river stage. Spring floodwaters inundate large areas of the deltas, and on reaching the coast spread over stable ground and floating ice up to 30 km (19 mi) from shore. When floodwater reaches openings in the ice often associated with tidal cracks, thermal cracks, and seal breathing holes, it rushes through with enough force to scour the bottom to depths of several meters (a process known as strudel scouring) (ADNR 2009a).

Along the Beaufort shelf, strudel scour craters have formed up to 6 m (20 ft) deep and 20 m (66 ft) across. In a study for the Northstar Pipeline, strudel scours were found in water

depths of 2.2 to 5.4 m (7.2 to 18 ft), with the greatest scour occurring at depths of 3 to 4 m (9.8 to 13 ft). Sheltered coastal areas and bays adjacent to major rivers (such as the Colville, Sagavanirktok, and Canning) are particularly susceptible to strudel scouring. In these areas, deltas can be totally reworked by strudel scouring in several thousand years, although the scours can be filled in very rapidly (ADNR 2009a).

In addition to seasonal flooding, many rivers along the coast are subject to seasonal icing before spring thaw. This is due to overflow of the stream or groundwater under pressure, often where frozen or impermeable bed sections force the winter flow to the surface to freeze in a series of thin overflows, or where spring-fed tributaries overflow wide braided rivers. In areas of repeated overflow, residual ice sheets often become thick enough to extend beyond the floodplain margin. These large overflows and residual ice sheets have been documented on the Sagavanirktok, Shaviovik, Kavik, and Canning Rivers (ADNR 2009a).

Seasonal flooding of lowlands and river channels is extensive along major rivers of the Arctic region. Thus, measures must be taken before facility construction and field development to prevent impacts on structures and environmental damage (ADNR 2009a).

Barrier Island and Bedform Migration. Barrier islands along the Beaufort shelf consist of dynamic constructional islands and remnants of the Arctic coastal plain (ACP). As the barrier islands along the Beaufort shelf are migrating westward and landward due to erosion and redeposition by waves and currents, they are generally becoming narrower and breaking up into smaller segments (Hopins and Hartz 1978). During the open water season, longshore drift, storm surges, and ice push contribute to the erosion, migration, and breakup of these islands, which may permanently affect their size and influence on coastal processes.

Along the Chukchi shelf, asymmetrical bedform features, including small sand waves, larger shore-parallel shoals, and the grouped features of the Blossom Shoals, occur in water depths ranging from less than 15 m (50 ft) to approximately 60 m (200 ft) and extend to distances of up to 160 km (100 mi) offshore. The migration of sand waves and other bedforms can cause problems to offshore facilities by undermining or burying fixed structures, anchors, moorings for submersibles, and pipelines, which can rupture (Bouma and Hampton 1986).

Overpressured Sediments. Along the Beaufort and Chukchi shelves, extremely high pore pressures are likely to be found in deep basins (Kaktovik, Camden, and Nuwuk) where Cenozoic strata are very thick. For example, in the Point Thomson area, pore pressure gradients as high as 0.8 psi/ft (far exceeding the normal gradient of 0.433 psi/ft) have been measured in sediments at burial depths of 4,000 m (13,100 ft) (Craig et al. 1985; ADNR 2009a).

Encountering overpressured sediments during drilling can result in a loss of well control or uncontrolled flow (if formation pressures exceed the weight of drilling mud in the well bore). Identifying locations of overpressured sediments by seismic data analysis and adjusting the drilling mud mixture accordingly reduce this risk (ADNR 2009a).

Shallow Gas Deposits and Natural Gas Hydrates. Shallow gas deposits have been mapped using high-resolution seismic data in isolated areas within the continental shelf and

slope regions of the Beaufort and Chukchi Seas. A recent investigation by the Joint Russian-American Long-Term Census of the Arctic Project team identified a pockmark field on the Chukchi Plateau. The pockmarks are typically related to the explosive release of gas (or gas-saturated water or oil)[12] (Astakhov et al. 2010). On the middle and inner shelf, gas is concentrated in buried Pleistocene delta and channel systems, along active faults overlying natural gas sources and in pockets within and beneath permafrost very near to shore. On the outer shelf and slope, shallow gas is likely to occur in association with a large body of gas hydrate and at the head of the landslide terrain on the outermost region of the shelf and upper slope. The origins of shallow gas may be biogenic or thermogenic; in either case, its presence poses a hazard to bottom-founded structures because it can reduce the shear strength of sediments. Loss of well control may also occur when drilling operations encounter overpressured gas below the seabed (Grantz et al. 1982a, b; ADNR 1999).

Natural gas hydrates are unique compounds consisting of ice-like substances composed of gas trapped within water molecules. They are common in offshore regions under low-temperature, high-pressure conditions as well as at shallower depths associated with permafrost. In the Beaufort and Chukchi Seas, gas hydrates have been found at shallow depths under permafrost along the inner shelf and onshore at Prudhoe Bay and at the Mount Elbert well in Milne Point where downhole coring and logging operations were recently completed (ADNR 2009a).

One of the main problems associated with gas hydrates is dissociation, which causes unstable conditions by increasing fluid pressure and reducing sediment shear strength. Natural mechanisms leading to gas hydrate dissociation include sea level decrease and sediment temperature increase. Man-made mechanisms include heat transfer during petroleum production that leads to melting of hydrates. During drilling, rapid decomposition of gas hydrates can cause a rapid increase in pressure in the wellbore, gasification of the drilling mud, and the possible loss of well control. If the release of the hydrate gas is too rapid, a loss of well control can occur, and the escaping gas could ignite. In addition, the flow of hot hydrocarbons past a hydrate layer could result in hydrate decomposition around the wellbore and loss of strength of the affected sediments (ADNR 2009a).

Dissociation of gas hydrates is a potential cause of submarine slope failures. Acoustic records indicate a stretch of slumps in the Beaufort Sea along the shelf-edge break. The slumps extend for at least 500 km (310 mi) in an area of known gas hydrates and should be considered during exploration and development activities (ADNR 2009a).

Because gas hydrates and shallow gas deposits pose risks similar to overpressured sediments, the same mechanisms for well control should be employed to reduce the danger of loss of life or damage to the environment (ADNR 2009a).

Sediment Sliding, Slumping, and Subsidence. Locally high rates of deposition of unconsolidated sediments on the increased gradient of the continental shelf edge may form

[12] On the Chukchi Plateau, pockmarks may indicate areas of rapid gas release; however, their size and morphology are also consistent with thermokarst depressions developed along the Arctic shoreline (Astakhov et al. 2010).

unstable slopes that lead to intensive soil movements such as slumping, gravitational creep, turbidity or debris flows, and mudslides. A chaotic sediment slide terrane exists along the length of the Beaufort shelf and upper slope, seaward to the 50- to 60-m (160- to 200-ft) isobath. The distinct landslide types in this area include large bedding-plane slides and block glides. Sediment slumping, possibly associated with permafrost melting, has been observed north of the Mackenzie Delta in Canadian waters and may also disrupt buried pipelines and damage drilling structures (Grantz et al. 1982b).

Sediment slumping may also occur in association with active faulting. Regionally high rates of deposition on the continental shelf may cause isostatic adjustments and deep-seated gravity faulting (active faulting). Active gravity faults related to large rotational slump blocks occur on the outer Beaufort shelf and upper slope due to increased gradients along the shelf-slope break (Grantz and Dinter 1980).

Seismicity. Ground shaking during a major earthquake can cause consolidation problems in artificial gravel islands used as drilling platforms and affect bottom-founded structures. Earthquakes can also cause vertical and/or horizontal displacement along faults, uplift or subsidence, surface tilt, ground failure, and inundation (due to tsunamis) — all of which may affect the integrity of development infrastructure.

Several types of shallow faults occur on the Beaufort shelf, including high-angle, basement-involved normal faults (Barrow Arch in Harrison Bay); listric growth faults; and down-to-the-north gravity faults along the shelf-slope break. There has been no seismicity associated with the high-angle faults in Harrison Bay in recent times and there is little evidence of Quaternary movement, but these faults may act as conduits for gas migration (Grantz et al. 1982a, b; Craig et al. 1985).

The Camden Bay area, located at the northern end of a north-northeast trending band of seismicity extending northward from east-central Alaska, is seismically active, and near-surface faults show marked evidence of Quaternary movement. Since monitoring began in 1978, numerous earthquakes have occurred in the area along the axis of the northeast-southwest trending Camden anticline, ranging in magnitude from 1 to 6 (Craig et al. 1985; Grantz et al. 1982a, b).

There is no historical record of seismicity on the Chukchi shelf; however, sediment-covered fault scarps in the northern Chukchi Sea suggest Quaternary movement along faults in this region (Thurston and Theiss 1987; Grantz et al. 1982a).

The region along Alaska's northern coast lies within an area where the peak horizontal acceleration with a 10% probability of exceedance in 50 years is between 0.03 and 0.07 g (Wesson et al. 2007). Shaking associated with this level of acceleration is generally perceived as weak, and the potential for damage to structures is negligible (Wald et al. 2005).

4.2.2 Sea Ice and Permafrost

4.2.2.1 Sea Ice

4.2.2.1.1 Cook Inlet. Ice cover in Cook Inlet is seasonal, forming in the fall (October to November; although the lower inlet is usually still ice-free in December) and disappearing completely in the spring. However, the dates of onset and clearance can vary considerably from year to year. The U.S. Army Corps of Engineers' (USACE) report *Marine Ice Atlas for Cook Inlet, Alaska* (Mulherin et al. 2001) provides a description of the factors that favor and discourage ice growth. It notes that offshore platforms built in Cook Inlet follow ice design criteria specified by the American Petroleum Institute. Since 1984, the National Weather Service (NWS) has provided analysis and forecasts for the extent, concentration, and stage of development of ice to aid commercial navigation, as well as fishing and tourist activities in the inlet (NWS ice chart archives are maintained by the Alaska State Climate Center in Anchorage); the National Ice Center also prepares semiweekly analyses throughout the ice season.

There are four types of ice that form in Cook Inlet: pack ice, shorefast ice, stamukhi, and estuarine and river ice. Pack ice is freely floating sea ice that forms directly from the freezing of seawater. In the shallow and turbulent waters of Cook Inlet, a major component of pack ice is "frazil" ice, which occurs as low-density masses of slushy, unconsolidated ice on the water surface. Floating ice poses the greatest hazard to navigation and marine structures. Between 1964 and 1986, at least eight incidents involving sea ice in Cook Inlet were recorded by the U.S. Coast Guard (USCG), most resulting in damaged pilings and docks in the Port of Anchorage area. In 1988, a small crude oil spill resulted when a tanker was punctured by ice. Several similar ice-related incidents have been recorded since then (Mulherin et al. 2001).

Shorefast ice is unmoving ice that remains firmly attached to the shoreline or other stationary structures once it forms. It forms directly by the freezing of seawater and from the piling and refreezing of ice or the flooding of snow on top of the ice. One form of shorefast ice, "beach ice," forms during flood tide as water freezes with mud and bonds to the sea bottom. When the air temperature is colder than seawater, this ice becomes progressively thicker with each successive high tide, accumulating as much as 2.5 cm (1 in.) of ice per tidal flood. The ice usually breaks free before it reaches about 0.5 m (1.6 ft) in thickness. Once freed, it becomes floating (pack) ice and drifts into deeper water (Mulherin et al. 2001).

Stamukhi are a form of sea ice that have broken and piled upward (hummocked) due to winds, tides, or thermal expansion. Under the right conditions (e.g., repeated wetting and accretion of seawater), they form the massive ice blocks (ice cakes) common to Cook Inlet. Stamukhi as thick as 12 m (40 ft) have been reported. Their large size makes them very hazardous to shipping vessels (Mulherin et al. 2001).

Much of the ice in Cook Inlet derives from freshwater sources — estuaries and rivers — especially in the head region and upper inlet. Estuarine ice is similar to sea ice but is significantly stronger. It is commonly entrained in pack ice and presents the same hazards to

navigation and marine (shoreline) structures. River ice is discharged into the inlet during spring breakup; ice pieces can be as thick as 2 m (6.7 ft) (Mulherin et al. 2001).

4.2.2.1.2 Arctic Region. The Beaufort shelf is ice-covered between mid-October and mid-June, with a typical ice-free period during August and September. Sea ice begins forming in late September to early October and becomes continuous nearshore by mid-October. This ice remains through the winter and starts to break up in July, but the nearshore region is not ice-free until early August. In recent years, breakup has occurred earlier by as many as 21 and 6 days along the Beaufort and Chukchi coasts, respectively. Ice-free coastlines now occur over a month earlier along the Beaufort coast (ADNR 2009a; MMS 2008c).

During the winter months, ice occurs within three main nearshore and offshore zones: the landfast zone, the shear zone (also called the active or stamukhi zone), and the pack ice zone. Landfast ice forms along the shore and develops seaward in the early fall, extending 25 to 50 km (16 to 31 mi) from shore by late winter. This ice is up to 2 m (6.6 ft) thick and is considered stable because it is relatively stationary (moving less than a few meters after it forms). Small movements of the ice are related to storm fronts, which cause narrow leads and rubble fields in this zone (Reimnitz and Barnes 1974; MMS 2008c; ADNR 2009a).

The shear zone (stamukhi zone) is a transitional zone between landfast ice and the highly mobile pack ice, occurring approximately 20 to 60 km (12 to 37 mi) from the coast in water depths of about 20 to 100 m (60 to 330 ft). Fragments of seasonal ice and multiyear ice ridges are common in this zone. Ice ridges range in thickness from 10 to 12 m (33 to 39 ft) with an average thickness of 6 m (20 ft). It is here where ice is constantly being reworked and shifted and ice gouging (discussed below) occurs most intensely (ADNR 2009a; MMS 2008c).

Seaward of the stamukhi zone is the pack ice zone, which marks the shoreward edge of the permanent polar ice cap. It consists of multiyear ice, ice ridges, and ice island fragments that migrate westward in response to the clockwise circumpolar gyre (Reimnitz and Barnes 1974; ADNR 2009a). The drift rate of ice in this zone can be as high as 20 km/day (12 mi/day) (MMS 2008c).

The Chukchi shelf is largely covered by ice between mid-November and mid-June; August and September are typically ice-free. Ice thicknesses in the region are generally less than 1.2 to 1.4 m (3.9 to 4.6 ft) during the annual cycle. Multiyear ice is common in the Chukchi Sea; extensive ridging (with a ridge frequency of 3 to 5 per kilometer and sail heights of 1.5 to 3.7 m [4.9 to 12 ft]) is also common (MMS 2008c).

Sea ice poses a potential hazard to coastal and offshore structures; for example, concrete island drilling structures could be pushed off location, ice could override a fixed structure, or a marine pipeline could be damaged where it comes ashore. Facilities exposed to the potential risks of each sea ice zone must be designed and fortified to accommodate ice forces (ADNR 2009a).

Ice Scouring (Ice Gouging and Strudel Scour). The continental shelf below the Beaufort and Chukchi Seas is vulnerable to ice gouging and strudel scour, both of which must be taken into consideration when siting and designing subsea pipelines. Ice gouging results when ice ridges or icebergs with deep keels, moving under the influence of forces such as wind and ocean currents, run aground and penetrate the seabed, leaving linear to curvilinear deep furrows. Strudel scour occurs in relatively shallow water in the spring during river breakup when overflood waters spreading over bottomfast ice sheets and draining with high velocity through holes in the ice sheet (e.g., tidal cracks, thermal cracks, and seal breathing holes) erode the underlying sediments, leaving behind circular or linear areas of scour in the seabed. The magnitude and frequency of strudel scour events are affected by the timing and location of overflooding river discharge (and the effects of ice jams), and the types of surface features present (e.g., drainage cracks and fissures). Pipelines should be trenched to depths below the predicted scour depth and should be designed to withstand the forces associated with the gouging process, which can cause significant soil displacement (MMS 2008c; ADNR 2009a).

Although ice gouges are found across the entire Beaufort shelf, they are concentrated in the stamuhki zone, between the 10- and 30-m (33- and 98-ft) depth contours, with the most intense gouging on the up-drift side of shoals and islands bordering the stamuhki zone. In this region, crossing frequencies of 1 to 6 gouges/km/yr and a maximum gouge depth of 3.9 m (13 ft) have been reported. Ice gouges have a general east-west orientation, reflecting the prevailing wind and surface current directions; however, on the inner shelf where shoals and other bottom features deflect the ice, orientations are more variable. Off Prudhoe Bay, the inner boundary of high-intensity ice gouging is controlled by the location of the island chains, about 15 to 20 km (9.3 to 12 mi) offshore. In Harrison Bay, where there are no barrier islands, ice gouges are concentrated in areas of abundant ice ridge formation (MMS 2008c; Craig et al. 2005).

Ice gouging is less frequent inshore of the stamuhki zone (with reported crossing frequencies ranging from 1 to 2 gouges/km/yr) (MMS 2008c). It is also less severe in this region because gouges are rapidly buried by sand waves or sediment sheets (loose, coarser grained sediments in the nearshore region degrade more rapidly than the more cohesive, fine-grained sediments offshore). The incidence of ice gouging also decreases with increasing water depth offshore of the stamuhki zone since the number of ice keels large enough to reach the bottom decreases. Along the outer shelf edge, strong geostrophic currents smooth the older ice gouges by eroding or filling them in (ADNR 2009a).

Little survey data on ice gouging features are available for the Chukchi Sea, and repetitive mapping that would allow observed gouges to be dated and gouge rates to be estimated has not been done. However, gouge geometry (depth and width) and density have been recorded over broad areas in the Chukchi Sea, to a maximum water depth of 60 m (200 ft). The most significant ice gouging occurs on the main part of the continental shelf at water depths of 30 to 60 m (98 to 200 ft) where surficial sediments consist of thin deposits of sand and gravel overlying stiff consolidated clay or dense sandy gravel. In this region, a maximum gouge depth of 4.5 m (15 ft) was observed within a water depth of 35 to 40 m (110 to 130 ft). Gouges may be many kilometers long and tens of meters wide, and their dominant orientation is northeast-southwest (MMS 2008c; Phillips et al. 1978).

The areas adjacent to the Herald and Hanna shoals have only limited ice gouging (no gouge depths were recorded). Nearshore areas where water is shallow (less than 30 m [98 ft]) have an average gouge depth of 0.8 m (2.6 ft) and also have a low ice gouging density (MMS 2008c; Toimil 1978). Nearshore sediments are reworked by waves and currents to the extent that ice gouge morphology is readily obliterated by erosion and/or burial (Barnes and Reimnitz 1979). In general, ice gouging is more prevalent in the northern part of Chukchi Sea because the extent and duration of ice cover is greater. In the southern part of the Sea, the longer open water season allows for more reworking of the seabed by wave and current action, which likely masks evidence of past gouging (MMS 2008c).

Ice Movement (Ice Ride-up, Ice Override, and Icebergs). Continuous, large-scale ice movements in the Beaufort Sea are caused by major current systems (e.g., the Beaufort Gyre), tidal currents, or geostrophic winds. Local, short-term movements result mainly from wind, wave, and current action, particularly during storms. During a single ice season, ice movements create zones of landfast and pack ice. Zone boundaries fluctuate with seasonal ice growth and movement. Ice movements at a given site may have a predominant direction due to geography and environmental conditions (ADNR 2009a).

On islands and coastal regions throughout the Beaufort Sea, both ice ride-up (or ice push) and ice override events erode and transport significant amounts of sediment. Ice ride-up occurs where strong wind or currents force ice blocks onshore, pushing the sediment from the coast into the ridges farther inland. These processes are particularly important to consider for the outer barrier islands, where ice ride-up ridges may be as high as 2.5 m (8.2 ft) and extend 100 m (330 ft) inland, and man-made structures are along the coast. They also have the potential to alter shorelines and nearshore bathymetry, increasing the risk of damage to man-made structures by erosion. Several accounts of damage to structures due to ice ride-up events have been documented along the Beaufort coast. For example, in January 1984, ice overtopped the Kadluck, an 8-m (26-ft) high caisson-retained drilling island located in Mackenzie Bay (MMS 2003e; ADNR 2009a).

Ice override occurs both offshore and onshore wherever ice overrides rafted ice or ice ride-ups along the coastline. Ice override onshore will add an additional dead load to a buried pipeline in the transition area from offshore to onshore beginning where the ice contacts the sea floor. This dead load, along with the force being exerted by the ice and the strength of soil, must be considered in pipeline design (ADNR 2009a).

Icebergs in the Beaufort Sea are rare but may be present as a result of calving off Nansen Island. Natural ice islands have also been observed on occasion. Ice islands are produced by the breakup of portions of the Ellesmere Ice Shelf and occur as tabular icebergs of the Arctic Ocean. They are usually 40 to 50 m (130 to 160 ft) thick with lateral dimensions that range from tens of meters to tens of kilometers. The annual risk of an iceberg or ice island impacting an offshore production facility is estimated to be 1 in 1,000 years; however, there is no threat to exploration or development activities in more shallow, nearshore regions (MMS 2008c; ADNR 2009a).

4.2.2.2 Subsea and Coastal Permafrost (Arctic Region)

Bonded permafrost formed on the Beaufort shelf during the Pleistocene lowstands of sea level to several hundred meters below the exposed shelf (Wang et al. 1982; Hunter and Hobson 1974). During the subsequent highstands of sea level, melting of the permafrost occurred, in part due to geothermal heating and saline advection of seawater into the sediments (MMS 1985; MMS 2003e). Currently, permafrost is known to be present onshore and is inferred to be present offshore in the Beaufort Sea Planning Area (MMS 1985). Subsea permafrost is inferred but has not been identified beneath the Chukchi Sea shelf (MMS 1987). Depths to the top of subsea permafrost in the Beaufort shelf are highly variable, and the thickness of the permafrost is unknown (MMS 1985). There is a transition from bonded permafrost on land that is unstable when thawed to generally thaw-stable materials offshore.

Thaw subsidence (also known as thermokarst subsidence) and frost heave associated with permafrost in the Arctic region can create potential hazards to onshore oil and gas operations. The geologic record during the last Arctic glacial-to-interglacial transition indicates that global warming played a key role in disrupting the thermal balance of permafrost and initiating regional thaw subsidence. And some of the thermokarst activity (e.g., melting of ice wedges) over the last 100 to 150 years can also be attributed to global warming (Murton 2008). Oil and gas related activities may also contribute to this process. These include drilling through permafrost layers; building and maintaining crude oil pipelines; placement and operation of bottom-founded structures; and construction of artificial islands, causeways, and berms. Subsea permafrost that contains trapped gas may melt during the drilling of wells or the subsequent production activities in areas surrounding the borehole, causing subsidence and rupture of the well casings and potentially leading to loss of well control.

4.2.3 Physical Oceanography

4.2.3.1 Gulf of Mexico

The physical conditions of ocean waters have the potential to disrupt activities relating to oil and gas production that occur on the continental shelf and slope, as well as in deepwater regions of the GOM. Coherent water motions and breaking waves can fatigue and damage oil and gas platforms and facilities, limit the timing of supply boats and drilling operations, and suspend all operations during extreme conditions such as hurricanes or tropical storms (MMS 2005a; Kaiser and Pulsipher 2007). As waves approach deck heights of platforms and supply ships, they can put equipment and personnel at risk (MMS 2005b). Storm events can also produce large forces near the ocean bottom that can scour sediments and affect pipelines and platform structures (Det Norske Veritas 2007; Cruz and Krausmann 2008; Wijesekera et al. 2010). Additionally, water currents and waves affect the horizontal and vertical transport of spilled oil, as well as contribute to the physical conditions that control natural weathering processes such as evaporation, emulsification, and oxidation (NOAA 2002; NRC 2003b).

The GOM is a partially enclosed sea covering an area of approximately 1.5 million km^2 (579,153 mi^2) and is connected to the Caribbean Sea and the Atlantic Ocean. The bathymetry of the GOM can be generalized as having a wide continental shelf along its northern and southern edges, prominent escarpments, and a relatively flat ocean floor (Bouma and Roberts 1990; see Figure 4.2.1-1. Circulation patterns in the GOM are the result of complex interactions among the bathymetry of the basin and forcing mechanisms that include winds, atmospheric conditions, water density (related to temperature and salinity), and the Loop Current (described below) (e.g., Oey et al. 2004; Sturges and Kenyos 2008). The GOM can be characterized as a two-layered system with respect to circulation patterns having a surface layer of up to 1,000 m (3,281 ft) in depth and a deep layer reaching down to the ocean floor at depths of approximately 4,000 m (13, 123 ft) (Lugo-Fernandez and Green 2011).

A generalized depiction of major circulation patterns and bathymetry of the GOM is shown in Figure 4.2.3-1. The Loop Current and its associated meso-scale eddies are the dominant circulation features (Oey et al. 2005). Effects associated with Earth's rotation set up a western boundary current that is a part of an anticyclonic (clockwise) circulation pattern found in the western half of the GOM (Sturges and Blaha 1975; Sturges 1993). Over the continental shelf of Texas and Louisiana, wind-driven downcoast currents are common, with an opposite current along the continental slope (Cochrane and Kelly 1986; Nowlin et al. 1998; Zavala-Hidalgo et al. 2003). Currents along the continental shelf off Mississippi-Alabama show a pattern of complex cyclonic and anticyclonic eddy pairs with strong inter-annual variability, and they are also influenced by the positioning of the Loop Current (Brooks and Giammona 1991; Jochens et al. 2002). Deepwater circulation follows a counterclockwise pattern and consists primarily of low-frequency waves that receive energy from the Loop Current and its eddies (Hamilton 1990, 2007).

Understanding the circulation patterns and physical oceanographic conditions is vital for improving oil and gas production and exploration activities with respect to preserving the environment (Ji 2004; Lugo-Fernandez and Green 2011). In the GOM, the energetic water currents and waves that have the greatest potential to affect oil and gas activities can be characterized as those associated with episodic weather events (e.g., hurricanes and tropical storms), large-scale circulation patterns including the Loop Current and its associated meso-scale eddies, vertically coherent deepwater currents, and high-speed jets (DiMarco et al. 2004).

4.2.3.1.1 Hurricanes and Tropical Storms. Tropical conditions normally prevail over the GOM from June until October, and in a typical year, 11 tropical storms will form in the region with approximately 6 reaching hurricane status (Blake et al. 2007). Hurricanes and tropical storms can increase surface current speeds to between 1 and 2 m/s (3.2 and 6.8 ft/s) in continental shelf regions (Nowlin et al. 1998; Teague et al. 2007), as well as produce current speeds of more than 0.5 m/s (1.6 ft/s) in deeper waters on the continental slope (Brooks 1983; Teague et al. 2007). Recorded wave heights during recent hurricanes have shown an increasing pattern, with maximum wave heights exceeding 30 m (98 ft), which are greater than the current 100-year storm criteria for platform deck heights (MMS 2005b; Jeong and Panchang 2008). Storm surges can impact infrastructure along coasts and have been reported to range between 2 and 8 m (7 and 26 ft) for hurricanes reaching the northern coast of the GOM (NOAA 2011b).

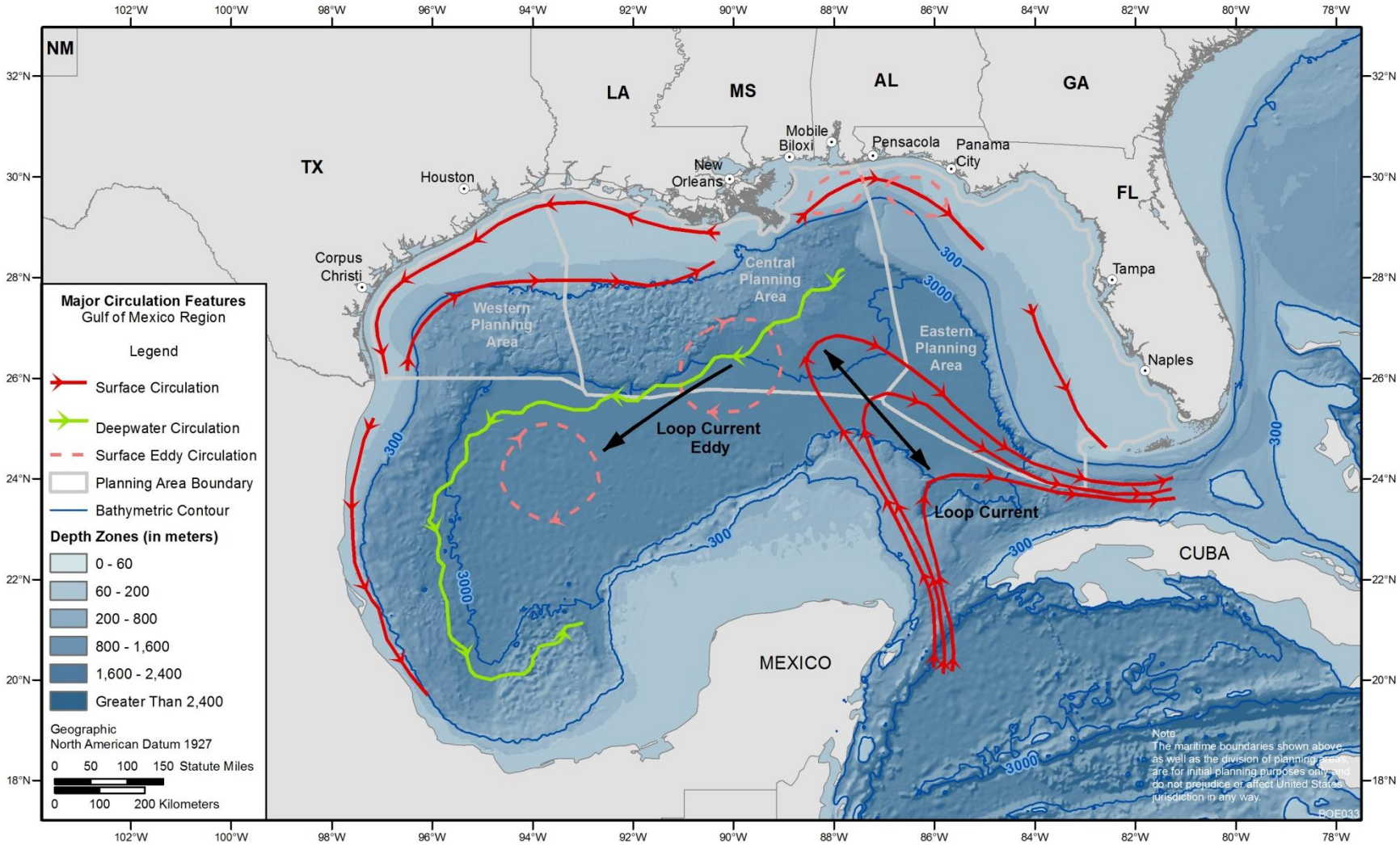

FIGURE 4.2.3-1 Generalized Circulation Patterns in the GOM

Extensive observations of hurricane-induced currents and waves were not available until recent years, starting with Hurricane Ivan in 2004, which passed over an extensive array of instrumented moorings of the U.S. Naval Research Laboratory's Slope to Shelf Energetics and Exchange Dynamics (SEED) program (Stone et al. 2005; Teague et al. 2006a). As Hurricane Ivan approached the northern GOM in the fall of 2004, wind stresses produced downwelling conditions on the continental shelf with advective onshore surface currents and offshore currents in the lower portion of the water column (Mitchell et al. 2005; Teague et al. 2007). Current speeds on the continental shelf were often greater than 1.1 m/s (3.6 ft/s) with many flow reversals during the passage of the hurricane, and strong waves prevailed for up to 10 days in the wake of the hurricane's passage (Teague et al. 2007; Wijesekera et al. 2010). Sediment scour on the continental shelf was observed to be more than 100 million m^3 (81071 ac-ft) over a region of 525 km^2 (203 mi^2) (Teague et al. 2006b). Maximum wave heights associated with Hurricane Ivan reached 28 m (92 ft) with significant wave heights (average wave height of the upper-third-largest waves) reach 16 m (52 ft) (Jeong and Panchang 2008).

Hurricanes Ivan, Katrina, and Rita (2004 and 2005) were some of the most powerful hurricanes to enter the GOM (Stone et al. 2005) and were very damaging to oil and gas facilities and production operations (Cruz and Krausmann 2008). The strong winds, rapid currents, high waves, and sediment scour associated with Hurricane Ivan damaged offshore platforms, production wells, and pipeline systems resulting in a disruption of 10% of the GOM's production over a four-month period (MMS 2005c). Hurricanes Katrina and Rita resulted in more than 150 platforms (approximately 4% of the total number of platforms in the GOM) being damaged or destroyed primarily by effects associated with wave inundation (Cruz and Krausmann 2008). In response to these recent and severe hurricane events, industry and regulators are reexamining offshore oil and gas structural designs to improve their resistance to hurricanes, especially with respect to deck heights to resist wave inundation, as well as mooring anchors and pipeline designs to prevent damage by sediment scouring and mudslides (Abraham 2005; MMS 2005b).

4.2.3.1.2 Loop Current and Loop Current Eddies. The dominant circulation pattern in the GOM is the Loop Current, which can be generalized as a horseshoe-shaped circulation pattern that enters through the Yucatan Channel and exits through the Florida Straits (Figure 4.2.3-1). The Loop Current covers approximately 10% of the GOM's area (Hamilton et al. 2000; Lugo-Fernandez and Green 2011), has surface current speeds up to 1.8 m/s (5.9 ft/s) (Oey et al. 2005), and is present down to an 800-m (2,625-ft) depth (Nowlin et al. 2000; Lugo-Fernandez 2007). The incoming water of the Loop Current through the Yucatan Channel is typically warmer and saltier than the GOM waters, which in combination with its highly inertial circulation pattern generates energetic conditions that drive circulation patterns throughout the entire GOM (Lugo-Fernandez 2007; Jochens and DiMarco 2008; Lugo-Fernandez and Green 2011).

The Loop Current is not a stagnant circulation, as it alters its orientation angle and periodically extends northwesterly into the GOM with filaments being observed to intrude onto the continental slope near the Mississippi River Delta (Muller-Karger et al. 2001; Oey et al. 2005). As the Loop Current extends north to approximately 27°N, an instability causes the formation of an anticyclonic eddy (Loop Current Eddy) to separate off from the Loop

Current (Hamilton et al. 2000; Vukovich 2007). The physical mechanisms that trigger these Loop Current Eddy separations and their frequency of occurrence are not fully understood (Chang and Oey 2010; Sturges et al. 2010), but the period between Loop Current Eddy separations ranges from 0.5 to 18.5 months (e.g., Vukovich 2007). A linear relationship that exists between the period between Loop Current Eddy separations and the retreat latitude of the Loop Current following separation results from a balance in vorticity between water entering and water exiting the GOM that is displaced by the intrusion of the Loop Current moving toward the northern slope region (Lugo-Fernandez and Leben 2010). Loop Current Eddies typically have a diameter of 300 to 400 km (186 to 248 mi), current speeds between 1.5 to 2 m/s (4.9 to 6.6 ft/s), and speeds up to 0.1 m/s (0.3 ft/s) at a 500-m (1,640-ft) depth (Brooks 1984; Cooper et al. 1990). Loop Current Eddies migrate to the west and southwest under forces induced by the Earth's curvature and rotation with translation speeds ranging from 2 to 5 km/day (1.2 to 3.1 mi/day) (Brooks 1984; Oey et al. 2005).

Loop Current Eddies typically affect deepwater regions (depths greater than 400 m [1,312 ft]) of the GOM and have the potential to disrupt exploration, drilling, and production activities (Crout 2009). Currents associated with Loop Current Eddies have the ability to cause vortex-induced vibrations that can damage platforms and drilling equipment (Kaiser and Pulsipher 2007). It has been estimated that a sustained current of 2 m/s (6.6 ft/s) can use up the fatigue life of certain mooring system components in 1 week (DiMarco et al. 2004).

4.2.3.1.3 Deepwater Currents and Subsurface Jets. Oil and gas exploration and production activities are expanding more and more to deepwater regions of the GOM, which is what motivates the current research emphasis in deepwater currents (McKone et al. 2007; Lugo-Fernandez and Green 2011). Energetic waves and high-speed jets can affect the transport of pollutants such as drilling fluids and oil, as well as physical structures relating to oil and gas operations (DiMarco et al. 2004). For example, the Deep Water Horizon oil spill of 2010 demonstrated the need to understand how deepwater currents affect underwater oil spill plumes (e.g., Adcroft et al. 2010).

Deepwater currents (depths greater than 1,000 m [3,281 ft]) along the northern GOM are typically characterized as meandering waves (referred to as topographic Rossby waves [TRWs]) that are vertically coherent with some degree of bottom intensification, have periods greater than 10 days, are largely decoupled from surface circulations, and have a propagation velocity on the order of 9 km/day (5.6 mi/day) (Hamilton 1990, 2009; Sturges et al. 2004). The energy source of these deepwater currents is not fully realized, but recent studies suggest that the Loop Current generates deepwater eddies near the Campeche Terrace that excite wave propagation westward along the continental slope of the northern GOM (Oey 2008). Additionally, high-energy waves (with periods of less than 10 days) have been observed locally along the Sigsbee Escarpment with maximum speeds of 0.9 m/s (3 ft/s) at depths below 1,500 m (4,921 ft) (Donohue et al. 2008). The analysis by Hamilton (2009) suggests that highly energetic TRWs along the Sigsbee Escarpment generate a mean deepwater flow to the west along the steep escarpment, which acts as the main deepwater transport pathway from the western to the eastern GOM, and that in the western GOM, TRWs are less energetic but interact in a similar fashion with the continental slope to form a generalized mean deepwater flow to the south along the

base of the continental slope off Mexico (the generalized deepwater flow path is shown in Figure 4.2.3-1).

Subsurface jets are characterized as currents with no surface expression, having durations on the order of hours to days, speeds in excess 0.4 m/s (1.3 ft/s), and observed currents up to 2 m/s (6.6 ft/s) (DiMarco et al. 2004). Subsurface jets occur at shallow depths (150–600 m [492–1,968 ft]) and in deep waters, and they are typically produced by the downward propagation of inertia in the wake of a storm passage or the interactions of eddy circulations and the topography of the continental slope (DiMarco et al. 2004; Fan et al. 2007). Deepwater jets are difficult to measure because of their limited spatial and temporal extents, but observations from moored instruments in the northwestern GOM show deepwater jets having maximum currents speeds between 0.5 and 0.8 m/s (1.5 and 2.6 ft/s) with durations on the order of 1 to 8 days (Hamilton and Badan 2009).

4.2.3.2 Alaska Region

Sea ice, ocean currents, tides, waves, and storm surges affect offshore oil and gas operations on the Alaska continental shelf and facilities located near the coastline. Typical currents and waves do not threaten the physical integrity of production equipment; however, cold air temperatures and the spray from waves can freeze on structures, causing structural damage as well as affecting the buoyancy of supply and drilling vessels to the extent of capsizing ships (Jones and Andreas 2009). Tides are considered minor along the coastal regions of the Arctic Ocean (NRC 2003a; Weingartner 2003), but tidal ranges in Cook Inlet are considered among the largest in the world (Archer and Hubbard 2003). Impacts of storm surges vary by season from coastal flooding during summer and fall events to ice gouging and damage associated with ice ride-up (wind-driven surge of ice onto shore) during winter and spring storm events (Lynch et al. 2008). While all these oceanographic factors influence oil and gas operations, the primary design consideration for platforms, vessels, pipelines, and other structures is the presence of sea ice and its interactions with currents, tides, and the bathymetry of the Alaska continental shelf (Weeks and Weller 1984; NRC 2003a).

The climate of the Arctic region is complex because of its multiple interactions with oceanic and terrestrial systems, and effects associated with global climate change have resulted in significant changes to the Arctic's atmospheric and oceanographic conditions over the past couple of decades (e.g., Morison et al. 2000; Arctic Council and IASC 2005). Air temperatures in the regions north of 60°N have warmed at a faster rate than that of the overall northern hemisphere over the past century (Arctic Council and IASC 2005). During the 1990s, several studies revealed a warming trend in the layer of Arctic Ocean water with origins from the Atlantic Ocean (Carmack et al. 1995; Grotefendt et al. 1998; Gunn and Muench 2001), as well as an overall increase in Arctic Ocean sea surface temperatures and lower surface-layer salinities along regions of the Beaufort Sea and the Chukchi Sea (Morison et al. 2000; Comiso 2003; Comiso et al. 2003).

The warming of air and water temperatures in Arctic regions generates variability in key factors and processes controlling oceanographic conditions, which include precipitation and

snow patterns, freshwater and sediment inputs to oceans, thermohaline circulation patterns (controlled by temperature and salinity gradients), and the aerial coverage and composition of sea ice (Morison et al. 2000; Arctic Council and IASC 2005; Bonsal and Kochtubajda 2009). Changes in oceanic conditions have also corresponded with sea level rise in the Arctic Ocean (Proshutinsky et al. 2001). Predicting oceanic responses to climate change is difficult because of complex interactions (often nonlinear) among factors such as water and air temperatures, sea ice, sea level rise, and thermohaline circulation patterns (e.g., Wang et al. 2003).

Alaskan coastal waters are largely covered by sea ice with some open-water areas for three-quarters of the year, from October until June, with the minimum sea ice extent occurring in September as sea ice begins to form and the maximum extent in March (Weeks and Weller 1984). Sea ice properties vary according to its age and the physical conditions under which it forms, melts, refreezes, and reforms (Gow and Tucker 1991). A general classification of sea ice includes ice formed along shores known as landfast ice and ice formed at sea called drift ice, which can conglomerate to form pack ice or ice floes (Mulherin et al. 2001). Landfast ice gradually advances seaward in the fall, rapidly retreats in the spring, and can break up and reform several times in between. Ice floes move according to wind and currents and can collide and pile on top of one another to form pressure ridges, as well as converge to form well-defined ice-free openings, or polynyas (Mahoney et al. 2007). Another important distinction in sea ice is the difference between newly formed first-year sea ice and multiyear sea ice, which by definition is summer minimum sea ice extent (Lemke et al. 2007).

The spatial and temporal variability in sea ice extent and thickness are controlled by local climate and oceanic factors, with many studies indicating a decreasing trend in Arctic sea ice over recent decades (e.g., Johannesen et al. 1995; Parkinson 2000; Comiso 2002). Sea ice extent, as observed mainly by remote sensing methods, has decreased at a rate of approximately 3% per decade starting in the 1970s (Johannesen et al. 1995; Parkinson et al. 1999). However, multiyear sea ice has decreased at a rate of nearly 9 to 12% per decade since the 1980s (Comiso 2002; Perovich et al. 2010). Since 2000, the extent of summer sea ice was at record lows in 2002 (Serreze et al. 2003), 2004 (Stroeve et al. 2005), 2007 (Perovich et al. 2008), and 2010 (Richter-Menge and Jeffries 2010). Sea ice thickness has also decreased during recent decades, with average sea ice draft (the depth of ice below sea level) values decreasing by as much as 1.3 m (4 ft) (Rothrock et al. 1999) and sea ice volumes decreasing at a rate of 4% per decade since 1948 (Rothrock and Zhang 2005). These recent trends in declining sea ice are a result of anthropogenic influences and natural climate variability, and recent climate simulations suggest that natural climate variability has the potential to cause a stabilization to a slight recovery of sea ice trends over short times scales on the order of a decade or less in the beginning part of the twenty-first century (Kay et al. 2011).

The interactions of sea ice with currents and waves have the potential to create hazardous conditions and damage physical structures though ice gouging, ice ride-up, and scouring, and to block vessel traffic (Weeks and Weller 1984). Landfast ice is typically not a concern as it exerts nominal internal stresses to structures, but ice floes formed during breakup conditions near shore or out in open pack ice areas have velocities on the order of 1 m/s (3 ft/s) (Stringer and Sackinger 1976). Ice gouging is caused by grounded ice keels within ice floes moving in response to wind and currents that typically occur in regions parallel to shorelines (Shapiro and

Barnes 1991). Ice gouging is of particular concern for pipelines, as seabed gouging depths can often exceed 3 m (10 ft), affecting coastal regions with up to 50 m (164 ft) of water depth (Weeks and Weller 1984). Ice ride-up occurs as repeated ice floes converge on shore, pile on top of each other, and pile shoreward under continued momentum. Ice ride-up events frequently occur during the spring and fall and can affect structures that are on the order of 50 m (164 ft) inland (Kovacs and Sodhi 1980). In spring, river floodwaters can inundate coastal areas covered by sea ice and potentially break through the ice, generating jet flows and scour craters in the sediments below (process referred to as strudel scour), which can damage pipelines and support structures. Strudel scour craters can be more than 4 m (13 ft) deep and 15 m (49 ft) across and can last up to 2–3 years before being refilled (Reimnitz and Kempema 1982). Strudel scour occurs most commonly near river deltas extending outward to water depths of 6 m (20 ft) (Hearon et al. 2009).

Sea ice also affects oil spill cleanup and weathering processes, as well as acting as a transport mechanism for spilled oil (Stringer 1980). Oil transport and reaction processes are significantly altered for waters that contain more than 30% aerial coverage of sea ice in comparison to open ocean waters (NRC 2003b). The presence of ice and lower water temperatures typically result in lower rates of oil weathering processes such as evaporation, emulsification, and oxidation (Thomas 1983); lower rates of dispersion because of the increased viscosity of oil at lower temperatures (Payne et al. 1991) and the presence of sea ice also has the potential to confine oil spills (Weeks and Weller 1984). Conversely, enhanced transport of oil by sea ice conditions can occur along open water channels or polynyas or by oil incorporation into moving ice floes (Payne et al. 1987). Empirical relationships describing the fate and transport of spilled oil-sea ice interactions are presented in Buist et al. (2008). Ultimately, the fate of oil in the presence of sea ice largely depends on the season (summer ice free, winter ice cover, and fall ice formation), as well as the age and morphology of the sea ice, because these factors determine the ability of the oil to reach reactive areas for oil weathering processes to occur as well as the weathering reaction rates (Payne et al. 1991; NRC 2003b).

4.2.3.2.1 Arctic Ocean: Beaufort Sea and Chukchi Sea. The Beaufort Sea and Chukchi Sea are semi-enclosed seas connected to the Arctic Ocean located along the northern coast of Alaska. The Chukchi Sea is a shallow, continental shelf sea with depths typically less than 50 m (164 ft) that receives Pacific Ocean water through the Bering Strait (Woodgate et al. 2005). The Beaufort Sea consists of a narrow (approximately 100 km [62 mi] wide) continental shelf before a shelfbreak that occurs near the 200-m (656-ft) water depth contour followed by a portion of the Canadian Basin of the Arctic Ocean (Weingartner 2003). The continental shelf region of the Beaufort and Chukchi Seas contains small shoals and barrier islands that affect shelf circulation patterns and are typically associated with the location of ice ridges (NRC 2003a).

The general circulation patterns in the Beaufort and Chukchi Seas are shown in Figure 4.2.3-2. Circulation in the Canadian Basin of the Arctic Ocean is dominated by the Beaufort Gyre, which is typically a clockwise (anticyclonic) circulation forced by prevailing atmospheric high pressure over the Arctic, but can reverse to a counterclockwise (cyclonic) circulation during summer months or prolonged periods of atmospheric low pressure

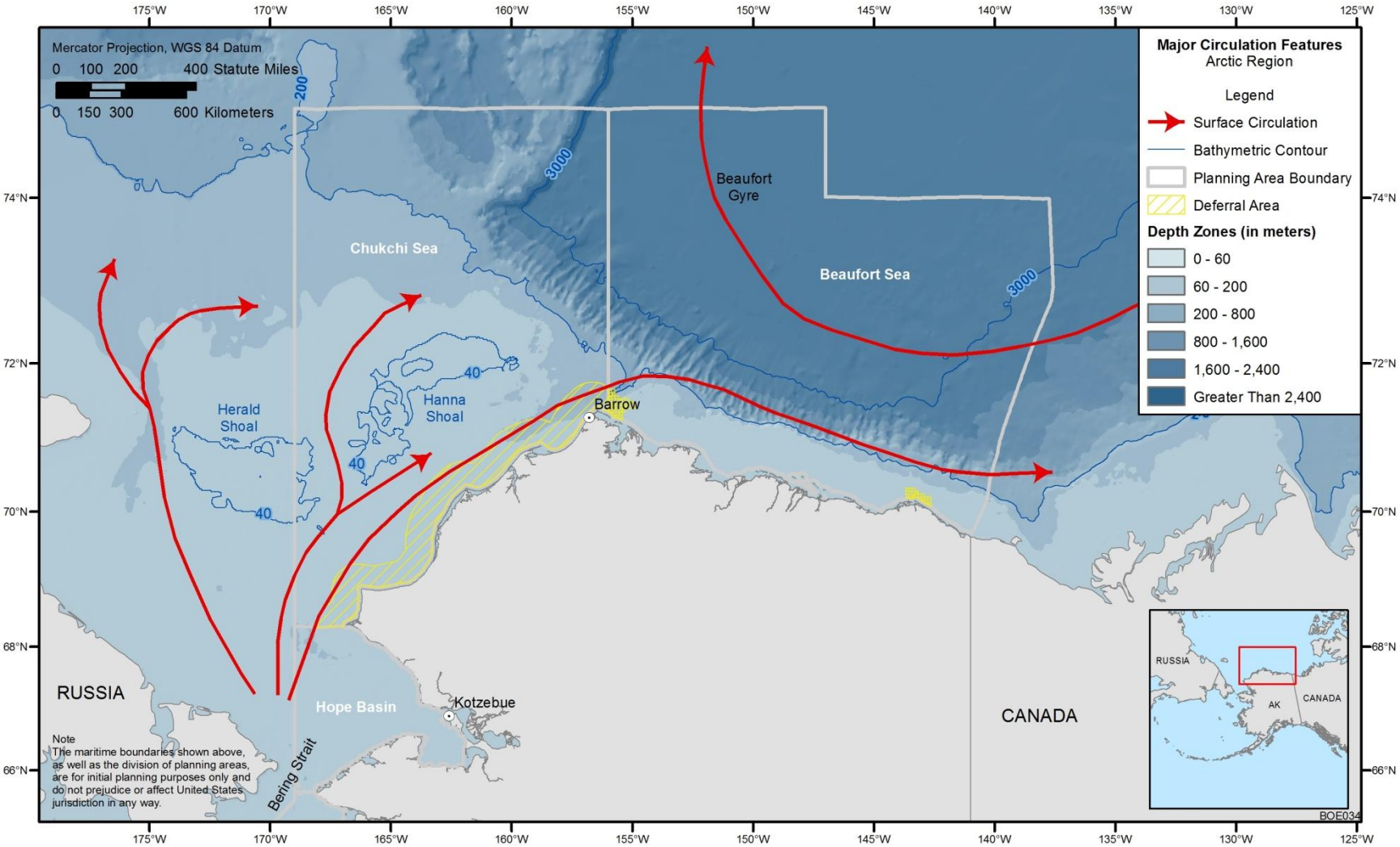

FIGURE 4.2.3-2 Generalized Circulation Patterns in the Chukchi Sea and Beaufort Sea

(Proshutinsky et al. 2003; Asplin et al. 2009). The sea level slope between the Pacific Ocean and the Arctic Ocean drives water through the Bering Strait into the Chukchi Sea, which separates into three principal branches of northward flow among Herald Shoal, Hanna Shoal, and the Alaskan coast (Weingartner et al. 2005; Woodgate et al. 2005; Weingartner et al. 2010). Currently, it is not fully understood how Pacific Ocean waters moving across the Chukchi Sea interact with circulation patterns off the shelfbreak of the Beaufort Sea, but evidence suggests the presence of narrow currents near the Beaufort shelfbreak with prevailing eastward flow and seasonal variability in surface and subsurface intensified currents (Pickart 2004; Spall et al. 2008; Nikolopoulos et al. 2009; Okkonen et al. 2009; Pickart et al. 2010; Weingartner et al. 2010). During the summer open-water season, current speeds along continental shelf areas often exceed 0.2 m/s (0.7 ft/s) with maximum speeds as high as 1 m/s (3 ft/s) in certain regions of constricted flow such as the Bering Strait and Barrow Canyon; during ice-covered seasons, current speeds are generally less than 0.1 m/s (0.3 ft/s) (Weingartner et al. 1998, 2009; Weingartner and Okkonen 2001).

The coasts of the Beaufort Sea and Chukchi Sea consist of river deltas, barrier islands, exposed bluffs, and large inlets; inland is characterized by low-relief lands underlain by permafrost (Jorgenson and Brown 2005). The combination of wind-driven waves, river erosion, and sea ice scour with highly erodible coastal lands creates the potential for high erosion rates along the Beaufort Sea and Chukchi Sea coasts (Kowalik 1984; Mars and Houseknecht 2007). From 1950 to 1980, the coastal erosion rates averaged 0.6 m/yr (2 ft/yr), and over the period from 1980 to 2000 this rate has increased to 1.2 m/yr (3.9 ft/yr) (Ping et al. 2011).

Present and future offshore oil and gas operations in the Beaufort and Chukchi Seas need to take into account climate change impacts on circulation and sea ice patterns. The complex circulation patterns on the Arctic continental shelf are affected by water temperature and density gradients and freshwater inputs of varying temperature from rivers as well as increased sea ice and glacier melting over recent years (Yamamoto-Kawai et al. 2009). Furthermore, reductions in sea ice have been more apparent in nearshore areas associated with landfast ice (typically extending out between 5 and 50 km [3 and 31 mi] from shore) in comparison to offshore regions (Mahoney et al. 2007; Fissel et al. 2009). A recent study has also shown that remote-sensing of sea ice extent may not always distinguish between first-year and multiyear sea ice, which is an important distinction in sea ice quality for supporting exploration activities, biotic habitats, and waterway access (Barber et al. 2009). The summer open ice season that determines when ships can enter the coastal regions along the north Alaskan coast has trended toward an earlier opening date in the spring and a later closing date in the fall (Fissel et al. 2009; Markus et al. 2009). While decreased sea ice has the potential to support more shipping activity in the Arctic, it is likely that hazardous ice floes will persist (Stewart et al. 2007), and decreases in landfast ice could result in increased impacts on coastlines through wave damage and ice ride-up (Arctic Council and IASC 2005).

4.2.3.2.2 Cook Inlet and Shelikof Strait. Cook Inlet and Shelikof Strait are located on the continental shelf of the Gulf of Alaska, which is a semi-enclosed basin of the Pacific Ocean surrounded by the steep terrain of the Alaskan coast. The continental shelf region is characterized as having a complex bathymetry of channels, island chains, and embayments.

Cook Inlet is a large embayment with a length of 330 km (205 mi) along a northeast to southwest axis that is approximately 37 km (23 mi) wide in the northeast near Anchorage and 83 km (52 mi) wide at its mouth (Gatto 1975). The upper and lower portions of Cook Inlet are formed by the coastline constriction that occurs near the West Forelands to the north of Kalgin Island. The Shelikof Strait, located southwest of Cook Inlet between the Alaskan coast and the Kodiak Islands, forms a fairly uniform channel that is approximately 270 km (168 mi) in length and 45 km (28 mi) wide (Muench and Schumacher 1980). Figure 4.2.3-3 shows the location of Cook Inlet and Shelikof Strait along with major circulation patterns.

The circulation along the continental shelf of the Gulf of Alaska is dominated by the Alaskan Coastal Current, which is driven by winds and freshwater runoff of the numerous rivers and glaciers along the Alaskan coast (Stabeno et al. 2004). Alaskan Coastal Current waters enter Cook Inlet through the Kennedy and Stevenson Entrances and flow northward along the eastern side of the inlet as the result of Coriolis forces (induced by the rotation of the Earth) and then cross over to the western side of the inlet because of the shoreline geometry near the Forelands (Rappeport 1982). Observed circulation patterns suggest a net outflow of surface flows out of the inlet, which implies that there is a net inflow of deepwater flows into the inlet (Potter and Weingartner 2010). Cook Inlet is estuarine in character because of the mixing of marine waters from the Alaskan Coastal Current and freshwater inflows from several rivers, resulting in complex density-driven circulation patterns (Rappeport 1982; Mulherin et al. 2001). The Matanuska River, Knik River, and Susitna River combined contribute more than 70% of the freshwater inputs to Cook Inlet in the northern basin, as well as act as a significant source of suspended sediments that can reach concentrations greater than 1,700 mg/L (Gatto 1975). Riverine inputs of freshwater and sediments to the northern portion of Cook Inlet vary seasonally, and their resulting influences on temperatures and salinity generate seasonal variability in circulation patterns in Cook Inlet (Okkonen et al. 2009).

The circulation patterns in Cook Inlet are significantly influenced by the strong semidiurnal tide pattern with corresponding tidal amplitudes that range between 4.2 and 5 m (14 and 16.4 ft) in the lower portion and up to 9.0 m (29.5 ft) in the upper portion of Cook Inlet near Anchorage (Rappeport 1982; Archer and Hubbard 2003). Tidal currents travel at speeds ranging between 1 and 4 m/s (3 and 13 ft/s) (Whitney 2000; Oey et al. 2007). Average water depths in Cook Inlet vary from 18.3 m (60 ft) in the upper portion to 36.6 m (120 ft) near its mouth, with several deep channels along its longitudinal axis that contain sand dunes with heights on the order of 2 m (7 ft) (Haley et al. 2000). The interaction of density-driven circulation and tidal currents results in rip currents that form persistently along the deep channels (Haley et al. 2000; Whitney 2000), which can often be observed by turbidity color changes, as well as the accumulation of surface debris and foam along rip current edges (Rappeport 1982). The ebbing flow out of Cook Inlet combines with Alaskan Coastal Current waters and enters the Shelikof Strait, where water depths are on the order of 200 m (656 ft) and average current speeds range between 0.2 m/s (0.7 ft/s) in the winter and 0.1 m/s (0.3 ft/s) in the summer (Muench and Schumacher 1980). The southwest flow out of the Shelikof Strait merges with the Alaskan Stream (the western boundary current of the Gulf of Alaska) approximately 200 km (124 mi) southwest of Kodiak Island (Stabeno et al. 2004; Rovegno et al. 2009).

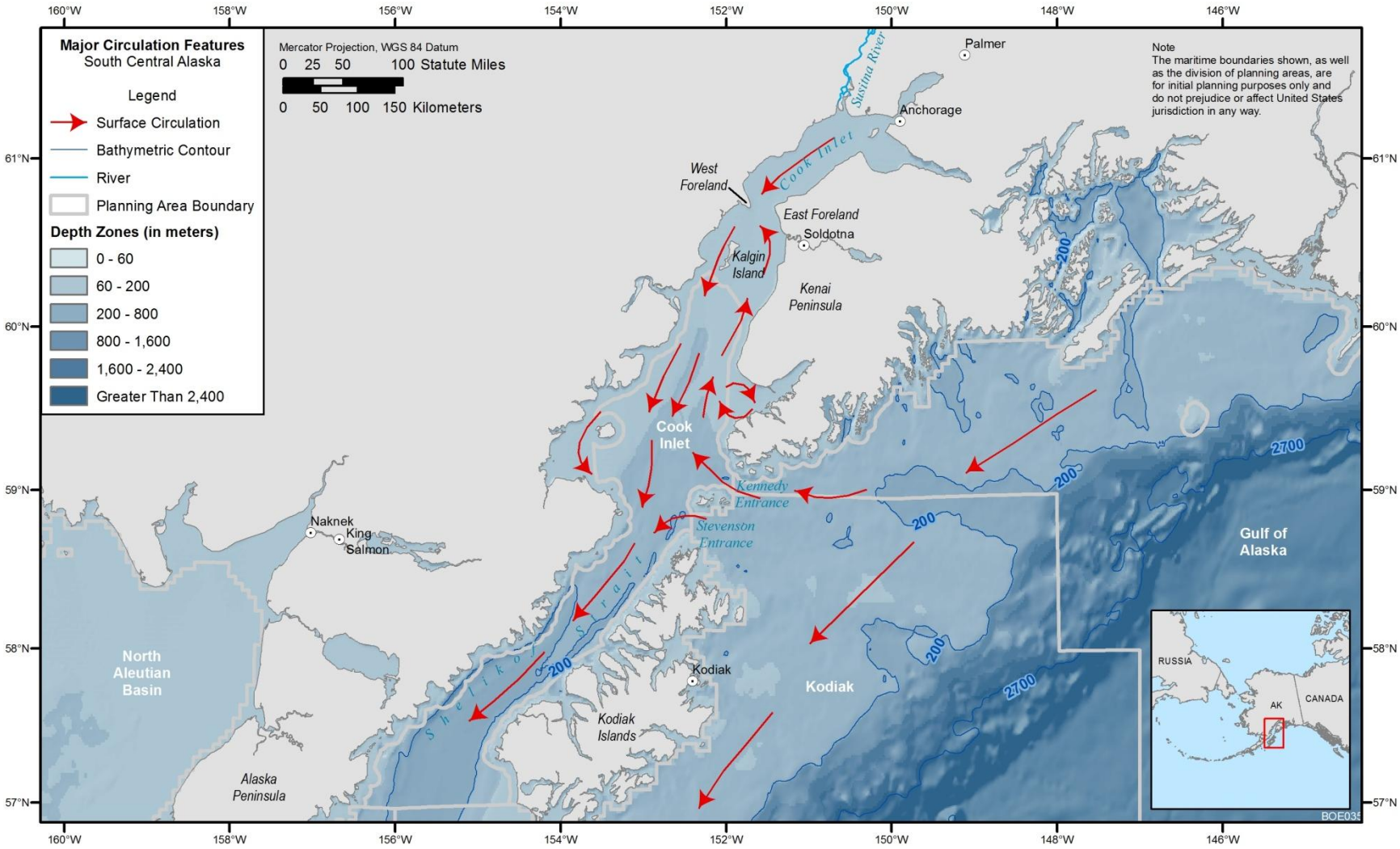

FIGURE 4.2.3-3 Generalized Circulation Patterns in Cook Inlet and the Shelikof Strait

Significant wave heights (average wave height of the upper-third-largest waves) are typically 0.6 m (2 ft) in the lower portion of Cook Inlet and the Shelikof Strait, but maximum wave heights of 5.5 m (18 ft) have been recorded during storm events (Rappeport 1982). Tsunamis can occur in response to volcanic activity of Mount St. Augustine on Augustine Island in the southwestern portion of lower Cook Inlet. Modeling results of the 1883 tsunami suggested wave heights of amplitude 1.2 to 1.8 m (3.9 to 5.9 ft) (Kienle et al. 1986). However, more recent modeling results suggest that the timing of a tsunami with the tidal phase can result in a fivefold amplification of wave heights near the shores of Anchor Point (Kowalik and Proshutinsky 2010).

Ice floes moving with tidal currents are the largest threat to navigation and marine structures in Cook Inlet. According to Mulherin et al. (2001), three types of sea ice form in Cook Inlet: pack ice, landfast ice, and stamukhi ice (forms by stacking of low-tide formed ice sheets on the sediment surface). The sea ice forms in the upper portion of Cook Inlet in the fall, while the lower portion is typically ice free until December. Stamukhi ice stacks can reach 7.5 to 12.2 m (24.6 to 40 ft) in thickness and typically become ice floes that move away from the shore because of buoyancy forces. During the fall-winter ice-covered season, the ice pack can cover between 10 and 80% of Cook Inlet, which becomes completely ice free each spring (Muench and Schumacher 1980; Mulherin et al. 2001).

4.3 ASSESSMENT OF ISSUES OF PROGRAMMATIC CONCERN

4.3.1 Multiple Use Issues and Marine Spatial Planning

The activities that may occur and the facilities that may be installed on the OCS as a result of the Program are described in Section 4.4.1, which presents a scenario for the projected amounts of oil and gas exploration and development activities and the number of facilities and pipelines that are estimated to take place or be installed during the program, if Alternative 1, the Proposed Action, is implemented. Comparisons with other alternatives are provided later in the document, but the analyses presented in Sections 4.3 and 4.4 would apply, as appropriate, across all the alternatives. Much of the rest of this chapter is concerned with assessing potential impacts from these activities and facilities on the environmental resources that are analyzed in the PEIS. In some areas, these oil and gas facilities and activities also create a potential for space use conflicts with other activities and facility sitings not related to oil and gas development. This section discusses the other major activities and facilities on the OCS that could occur and coexist with oil and gas construction and activities during the program and, as a result, create potential space use conflicts. These conflicts could include situations in which the presence of oil and gas infrastructure and associated support, exploration, and production activities preclude, or are precluded by, other uses of the OCS; or situations in which oil and gas facilities and activities in combination with other types of activities and infrastructure could threaten the ecological sustainability of the area. Typically, the Bureau of Ocean Energy Management (BOEM) has managed OCS space and multiple use issues through coordination with other State and Federal agencies that manage and regulate activities on or near the OCS, and has developed regulations, lease stipulations, and other mechanisms to restrict oil and gas activities to avoid conflict with other activities taking place in the same area. In recent years, Coastal and Marine Spatial

Planning (CMSP) has emerged as a new paradigm and planning strategy for coordinating all marine and coastal activities and facility constructions within the context of a national zoning plan.

4.3.1.1 Multiple Use Issues

4.3.1.1.1 Department of Defense Use Areas. Military Use Areas, established off all U.S. coastlines, are required by the U.S. Air Force (USAF), Navy, Marine Corps, and Special Operations Forces for conducting various testing and training missions. Military activities can be quite varied, but they normally consist of air-to-air, air-to-surface, and surface-to-surface naval fleet training; submarine and antisubmarine training; and Air Force exercises. Offshore military areas (including military dumping areas) are present in some OCS planning areas. Section 3.9.1.2.3 of this draft PEIS discusses offshore military use areas in the OCS planning areas being considered for the proposed action.

Aircraft operated by all U.S. Department of Defense (USDOD) units train within a number of special use airspace (SUA) locations that overlie the military operating areas, as designated by the Federal Aviation Administration (U.S. Fleet Forces 2010). SUAs are the most relevant to the oil and gas leasing program because they are largely located offshore, extending from 5.6 km (3 NM or 3.5 mi) outward from the coast over international waters and in international airspace.

There are 21 U.S. military bases along the coasts of the planning areas being considered for oil and gas leasing in the proposed action: 18 bases along the GOM coast and 3 in the vicinity of the Cook Inlet Planning Area. In addition, there are four active USAF radar sites located on the coast bordering the Beaufort and Chukchi Sea Planning Areas. They are all Long-Range Radar Sites, and each site has restricted areas within certain facilities. Access to each is only for personnel on official business and with approval of the commander of the USAF's 611th Air Support Group. While there are a number of military use restriction areas (danger zones or restricted areas) in the GOM (see Figure 3.9.1-2), there are no such restrictions in the waters of the Cook Inlet Planning Area or the Beaufort and Chukchi Sea Planning Areas (National Marine Protected Areas Center 2008). In the Cook Inlet Planning Area, the closest danger zone is Blying Sound, which is managed by the U.S. Navy and located to the east of Cook Inlet near Prince William Sound. The Blying Sound Danger Zone is rarely activated, and there are no use restrictions for most of the year.

Danger zones are defined as water areas used for a variety of hazardous operations (Marine Protected Areas Center 2008; U.S. Fleet Forces 2010). Danger zones may be closed to the public on a full-time or intermittent basis. Restricted areas are water areas defined as such for the purpose of prohibiting or limiting public access. Restricted areas generally provide security for Federal Government property and/or protect the public from the risks of damage or injury that could arise from the Federal Government's use of that area.

There are more than 40 military warning areas in the northern GOM area, designated by the USAF for the conduct of various testing and training missions, and by the U.S. Navy for various naval training and testing operations. Most of these areas overlie waters that are less than 800 m (2,600 ft) in depth (Figure 3.9.1-2).

Although offshore oil and gas activities have the potential to affect military activities, the USDOD and U.S. Department of the Interior (USDOI) have cooperated on these issues for many years and have developed mitigation measures that minimize the potential for conflicts. For example, stipulations are applied to oil and gas leases in critical military use areas. Whenever possible, close coordination between oil and gas operators and the military authorities for specific operational areas is encouraged and, in some cases, is required under these lease stipulations. In some instances where the military requires unimpeded access to specific areas on the OCS, specific lease blocks have been deleted from one or more proposed lease sales.

The USDOI will continue to coordinate with the USDOD regarding future lease offerings, new areas of industry interest, and current or proposed areas of military operations. As part of this coordination, applicable stipulations would continue to be routinely evaluated and modified, as necessary, to minimize or eliminate conflicts. An example of this process was the inclusion of three previously deferred blocks (Mustang Island Blocks 793, 799 and 816) in the Western GOM Planning Area in OCS Lease Sales 192 and 196, subject to a recently revised Lease Stipulation of Operations in the Naval Mine Warfare Area.

Offshore oil and gas development under the proposed action within the Alaska Region would not interfere with standard or routine military practices. Additional vessel traffic resulting from industry development and exploration would simply increase existing traffic and not affect military activities. The BOEM works in cooperation with the USCG regarding industry exploration and development in waters off the coast of Alaska.

4.3.1.1.2 Liquefied Natural Gas Facilities. Natural gas is liquefied to concentrate a much greater volume of product in a given space to facilitate storage and/or transportation. Use of liquefied natural gas (LNG) reduces the volume it occupies by a factor of more than 600, making the transportation of gas in tankers economical. Environmental effects specific to LNG transportation and facilities are associated with explosions and fires and with the cryogenic and cooling effects of either an accidental release of LNG or the release of cooled water during the vaporization process. In the GOM, most, if not all, LNG facilities are expected to use an open-loop vaporization process that uses a throughput of approximately 130 to 250 million gallons per day of seawater to raise the temperature of the LNG from –260°F to 40°F. This process produces a discharge of seawater that has been cooled by as much as 20°F. These discharges are expected to occur in water depths ranging from 18 to 55 m (60 to 280 ft). This large volume of cool, dense water could create an impact on the surrounding environment, rendering the area uninhabitable by local species of invertebrates and fish, especially in the GOM. The magnitude of this impact is still unknown since there is only one facility (the Gulf Gateway facility) currently operating. The potential cumulative effect of multiple facilities also needs consideration. In addition to the thermal discharge, biocides are added to prevent fouling of the flow through the system.

These facilities operate by offloading vaporized LNG from tankers into the existing offshore natural gas pipeline system. Although BOEM does not permit or regulate these facilities, their increased presence and use on the OCS will create space use issues and will add to the existing mix of potential offshore cumulative impacts. Currently, only one LNG facility has been constructed and is operating on the GOM OCS. The Gulf Gateway Energy Bridge, which was brought into service in March 2005, is located in 85.3 m (280 ft) of water in West Cameron, South Addition Block 603, approximately 116 mi (187 km) offshore of the Texas–Louisiana border. The Gulf Gateway Energy Bridge is capable of delivering natural gas at a base load rate of 500 Bcf per day.

Other LNG facilities on the OCS are currently in some stage of the permitting process. The Bienville Offshore Energy Terminal is a planned LNG facility located 63 mi (101 km) south of Mobile Point, Alabama. The initial application for the facility was withdrawn on October 9, 2008, and a revised application, submitted on June 30, 2009, featured a redesigned terminal using "closed-loop" ambient air technology for LNG vaporization. The application was approved in 2010. In Louisiana, the Main Pass Energy Hub is a converted sulfur and brine mining facility. This LNG facility is expected to begin operations sometime in 2011 or 2012.

4.3.1.1.3 Alternate Energy Development. In April 2009, the President and the Secretary of the Interior announced the final regulations for the OCS Renewable Energy Program, which was authorized by the Energy Policy Act of 2005. The final regulations (74 CFR Part 81: 19638–19871) govern management of the BOEM Renewable Energy Program by establishing a program to grant leases, easements, and right-of-ways (ROWs) for renewable energy development activities on the OCS. Renewable energy from the OCS may come from technologies and projects that harness offshore wind energy, ocean wave (hydrokinetic) energy, or ocean current (hydrokinetic) energy.

Multiple Federal agencies have responsibilities for the regulation and oversight of renewable energy development on the OCS. The BOEM issues leases and grants for both OCS wind and hydrokinetic projects and permits the construction and operation of wind facilities. The Federal Energy Regulatory Commission will permit the construction and operation of hydrokinetic facilities on BOEM-issued wave and current energy leases. The BOEM also has the authority to issue ROWs for offshore transmission lines that would link OCS renewable energy projects in order to facilitate efficient interconnection of the OCS projects to the onshore electric grid.

As required by the Energy Policy Act, the BOEM will issue leases on a competitive basis unless it determines that no competitive interest exists. After a lease is acquired, the developer must submit and receive approval of appropriate plans (for wind energy projects) or license applications (for hydrokinetic projects). At the end of the lease term, the developer must decommission the facilities in compliance with BOEM regulations.

There are currently no commercial hydrokinetic or wind energy projects on the OCS in the planning areas under consideration for the Program. The BOEM, in coordination with relevant states, has identified Wind Energy Areas (WEAs) offshore of the mid-Atlantic coast.

Although OCS oil and gas leasing and development activities could interfere with future OCS wind energy renewable energy projects (and vice-versa), the BOEM offshore oil and gas and offshore renewable energy programs will be coordinated to ensure that leasing and development activities under both programs are carried out with as little conflict between the two programs as possible. The identification of any future WEAs in areas with high or expected levels of oil and gas development (such as the GOM) will also be closely coordinated between the two programs. No such WEAs, however, have been identified in any of the BOEM OCS planning areas being considered for oil and gas leasing under the proposed action, nor are any wind or kinetic energy developments anticipated there during the program.

4.3.1.2 Coastal and Marine Spatial Planning

On July 19, 2010, the President signed Executive Order (EO) 13547, *Stewardship of the Ocean, Our Coasts, and the Great Lakes*, establishing a national policy for the stewardship of these resources. This national policy identifies Coastal and Marine Planning (CSMP) as one of the nine objectives. Furthermore, it outlines a framework for effective CMSP to address conservation, economic activity, user conflict, and sustainable use of the ocean, coasts, and Great Lakes.

Despite the existence of numerous articles on CMSP (e.g., see papers in *Marine Policy*, Vol. 32, 2008) and the incorporation of marine spatial planning (MSP) principles by various nations into their resource management practices (e.g., EO 13547; the National Oceanic and Atmospheric Administration (NOAA) CSMP Program, http://www.cmsp.noaa.gov/program/index.html), a standard, universally accepted definition of MSP currently does not exist. Most existing definitions are phrased in broad terms and objectives, such as the United Nations Educational, Scientific and Cultural Organization (UNESCO) definition, "[MSP] … is a public process of analyzing and allocating the spatial and temporal distribution of human activities in marine areas to achieve ecological, economic, and social objectives that have been specified through a political process" (UNESCO-IOC 2010).

Although NEPA is not usually seen as a spatial planning exercise, the PEIS for the Program and subsequent NEPA evaluations effectively are, at least in part, just that. The draft PEIS identifies broad areas of the OCS where oil and gas leasing may occur and identifies in a spatial and temporal context the potential for impacts on natural and social resources and systems that could occur with subsequent oil and gas leasing in those areas. The subsequent lease sale and post-lease NEPA analyses identify the specific areas and time frames where and when mitigating measures need to be applied to address potentially unacceptable impacts on natural resources and socioeconomic resources and systems. One outcome of this NEPA process, therefore, is the identification of areas on the OCS where BOEM regulates and manages oil and gas operations to meet economic and social objectives in a manner compatible with environmental sustainability objectives.

Table 4.3.1-1 describes ways in which the objectives and methods of CMSP are compatible with or differ from those of the Five-Year Programmatic EIS. While there are

TABLE 4.3.1-1 Comparison of the Objectives and Methods of CMSP with Those of the 2012-2017 OCS Oil and Gas Leasing Program PEIS[a]

Coastal and Marine Spatial Planning	Programmatic EIS
Envisioned as a tool to make ecosystem-based management of marine resources possible.	Uses a broad scale appropriate for an ecoregional approach for evaluating potential impacts.
Large Marine Ecosystems (LMEs) used to define spatial boundaries.	Large Marine Ecosystems (LMEs) used to define spatial boundaries.
Based on hierarchal scale-based approach addressing different issues and at different scales at each level of analysis, and in which each level provides context for the next lower level.	The NEPA concept of tiering is based on a hierarchal scale-based approach in which the programmatic EIS provides the general context for the more detailed analyses in the lease sale EIS.
Used to develop areas identifying ecologically sensitive regions as well as areas suitable for specific human uses.	Used as the first step in a planning process to develop areas where oil and gas operations will be regulated to be consistent, in combination with other uses of the area, with current environmental sustainability objectives.
Used to plan for existing and proposed offshore uses, while reconciling economic, social, and environmental demands on an area.	Programmatic cumulative analysis evaluates all differing economic, social, and environmental demands on an area to inform the decision on program timing, size, and locations.
Based on multiple sector planning approach.	Focused on the effects of a single sector on other sectors.

[a] Highlighted text shows areas of particular similarity.

fundamental similarities and overlaps between the objectives and approaches of CMSP and the 2012-2017 PEIS, a major distinction between the two planning approaches is that the PEIS perspective focuses on the single use of the OCS for hydrocarbon exploration, extraction, and transportation, whereas the CMSP focuses on reconciling all economic, social, and ecosystem uses of an area in developing a CMS plan.

The National Ocean Policy framework document divides U.S. waters (mean high water mark to 200 NM) into nine regions based on Large Marine Ecosystem (LME) boundaries. CMS plans will be created and implemented at the regional level though stakeholder input. It is anticipated that the plans will serve as an overlay for decisions made under existing regulatory mandates. In effect, regional CMS plans once approved by the National Ocean Council (NOC) will assist the BOEM programmatic EIS process in making informed decisions.

4.3.2 Health Impact Assessment

4.3.2.1 National Environmental Policy Act

The National Environmental Policy Act and its related Federal guidelines (40 CFR 1508.8; 1978) have explicit language that requires the evaluation of both direct and indirect effects of the oil and gas industry on human health as well as the effects on low-income and minority populations (CEQ 1997). NEPA regulations instruct agencies to evaluate "the degree to which the proposed action affects public health or safety" (Berner 2011). Although these mandates exist, limited health information is currently included in Federal EISs. With the addition of the discussion of health issues in the planning stages, the impacts on human health can be considered beforehand, public and decision-maker awareness can be promoted, and prevention or mitigation can be built into the operations (Bhatia 2007; Niven and McLeod 2009). This would, in essence, change the process from reactionary to precautionary, thus attempting to remove or control health issues at the source (Niven and McLeod 2009).

4.3.2.2 Potential Impacts on the Human Environment

Offshore oil and gas activities have the potential to cause both adverse and beneficial impacts on human health. The exploration and development phases of oil and gas activities are beneficial because they require a large and diverse labor force to build the platforms, exploratory rigs, and various ships, boats, and barges necessary for working offshore (Luton and Cluck 2003). Increases in the labor force can promote the economy and development of infrastructure in these communities (Berner 2011).

Effects on the human environment can be both positive and negative, specifically with respect to psychological effects. The announcement of a leasing decision can affect humans in a positive way because it can boost the economy and bring much needed infrastructure development, while possible negative effects could be related to additional stress and anxiety over oil spills and impacts on the natural resources that communities use for a subsistence lifestyle (NRC 2003). Negative impacts on the human environment vary based on whether they are the result of routine events or the result of the threat/event of an accidental oil spill.

4.3.2.3 Potential Impacts of Routine Events Oil and Gas Activities

The North Slope Borough, Alaska, and the Alaska regional office of BOEM, through a Memorandum of Understanding, have evaluated the effects of the oil and gas industry on humans in the region. Appendix J of the *Beaufort and Chukchi Sea Planning Areas Oil and Gas Lease Sales 209, 212, 217, and 221 Draft Environmental Impact Statement* (OCS EIS/EA MMS 2008-0055) presents a full evaluation of these effects and is hereby incorporated by reference in this PEIS (http://www.alaska.boemre.gov/ref/EIS%20EA/ArcticMultiSale_209/_DEIS.htm).

Public concerns regarding pollution of locally harvested fish and game, loss of traditional food sources and hunting grounds, and rapid social changes are examples of negative impacts on humans in Alaska. The harvesting of wildlife resources in the North Slope of Alaska contributes widely to the cultural, nutritional, and economic way of life of the residents living there (NRC 2003). These impacts could affect both physical and mental health of Native tribal communities. Changes in the traditional way of life can lead to deteriorating physical well-being and mental health as well as increased domestic violence and substance abuse. North Slope tribal communities are concerned about the impacts of noise associated with routine operations on bowhead whale migration routes, as they depend on these whales for subsistence (NRC 2003). If the whales migrate farther offshore, there are increased safety risks for the whalers themselves who must travel in more dangerous seas to hunt. Increased stress and anxiety from oil and gas development may contribute to the mental health issues of Alaskans (NRC 2003).

The increased development has increased the smog and haze near some villages, which could be the cause for increased instances of asthma. Air quality is a major concern for the residents who live there (NRC 2003). The impacts of the proposed action on air quality and related health concerns are discussed in Section 4.4.4. Increased rates of diabetes are likely the result of residents consuming higher concentrations of nonsubsistence foods such as shortening, lard, butter, and bacon, and consuming less fish and marine mammal products (Ebbesson et al. 1999 referenced in NRC 2003).

However, the increased revenue from the oil and gas industry can promote the economy and improve infrastructure of these more remote locations, resulting in beneficial impacts (Berner 2011). Alaska Natives have recognized that they have benefited by receiving monies to spend on public works and facilities, as well as better health care and counseling centers (NRC 2003).

As discussed in Section 4.4.14, Environmental Justice, much of the Alaska Native population resides in the coastal areas of Alaska. Any new onshore and offshore infrastructure occurring between 2012 and 2017 could be located near these populations or near areas where subsistence hunting occurs. Any adverse environmental impacts on fish and mammal subsistence resources from installation of infrastructure and routine operations of these facilities could have disproportionately higher health or environmental impacts on Alaska Native populations. Mitigation measures, cooperative agreements between Native and industry groups, and government-to-government consultations are designed to limit the effects from routine events.

4.3.2.4 Potential Impacts of Accidental Spills

4.3.2.4.1 Gulf of Mexico. The impacts on human health as a result of oil spills can be broken down into several categories. Goldstein et al. (2011) list the categories as “those related to worker safety; toxicological effects in workers, visitors, and community members; mental health effects from social and economic disruption; and ecosystem effects that have consequences for human health.” Initial concerns focus on the short-term toxicological effects to

humans such as nausea, dizziness, eye irritation, headaches, and respiratory and dermal irritation, but more research is necessary to understand long-term effects (Goldstein et al. 2011). Impacts on air quality include the emission of pollutants from the oil and the fire emissions that are hazardous and possibly fatal to humans, as well as the dispersant mist resulting from the application of the chemical dispersants on the oil (BOEMRE 2011). The impacts of the proposed action on air quality are fully discussed in Section 4.4.4.

After an accidental release of oil into the environment, the more volatile, water-soluble, and degradable compounds will be weathered and degraded, leaving behind the heavier, less degradable elements. These heavier elements, when combined with sand on beaches, form tar balls, which can be encountered by beachgoers for some time. Humans walking along the beach can absorb these heavier elements through the soles of their feet and subsequently into their bloodstream (OSAT-2 2011). Beachgoers may also inhale petroleum hydrocarbons present as vapors or attached to airborne particles (OSAT-2 2011). Other immediate effects of particular concern are heat stroke and exhaustion and the inappropriate use of personal protective equipment by cleanup crews, especially in the GOM. In the case of the Deepwater Horizon event, elevated rates of post-traumatic stress disorder, depression, alcohol abuse, and conflicts between domestic partners were observed (Goldstein et al. 2011). A large part of the GOM region's economy is based on the oil and gas industry and the harvesting of seafood. Restrictions placed on these industries due to an oil spill can increase the anxiety levels of humans and may contribute mental health issues (Goldstein et al. 2011).

Oil spills have the potential to impact certain groups of people more than others based on their current state of health. For example, GOM coast populations include communities that are still recovering from Hurricane Katrina, and "among the 50 States, Louisiana ranks 44th to 49th (depending on the metric used, with 1st being the best) in the overall health of residents, rates of infant death, death from cancer, premature death, death from cardiovascular causes, high-school graduation, children living in poverty, health insurance coverage, and violent crime" (United Health Foundation 2009 as referenced in Goldstein et al. 2011). As discussed in Section 4.4.14, there are areas in the GOM of environmental justice concern. It is possible these low-income and minority populations could be affected to a greater extent than the general population because of their dietary reliance on wild coastal resources, their reliance on these resources for other subsistence purposes such as sharing and bartering, their limited flexibility in substituting wild resources with those purchased, and their likelihood of participating in cleanup efforts and other mitigating activities.

4.3.2.4.2 Arctic and Cook Inlet. The Native tribes of the North Slope have serious concerns about what would happen if there was an accidental oil spill in the Arctic region. An oil spill could have physical, psychological, social, economic, spiritual, and cultural impacts on the Native Alaskans. Major areas of concern are with impacts on subsistence resources, air quality, and oil spill cleanup. These concerns are related to how and if it would be cleaned up and how the International Whaling Commission would react if the spill greatly impacted the bowhead whale population (NRC 2003). The impacts of the proposed action on air quality are discussed in Section 4.4.4. The North Slope Borough, Alaska, and the Alaska regional office of BOEM have, through a Memorandum of Understanding, evaluated the effects of the oil and gas

industry on humans in the region. Appendix J of the *Beaufort and Chukchi Sea Planning Areas Oil and Gas Lease Sales 209, 212, 217, and 221 Draft Environmental Impact Statement* (MMS 2008) presents a full evaluation of these effects.

Oil spills can affect human health in Alaska through the same ways as discussed for the GOM; additionally, major concerns involving the impacts on human health due to oil spills relate to the subsistence lifestyle of Native Alaskans. Humans can be affected through contact with the contaminants, such as through inhalation, skin contact, or intake of contaminated foods; through reduced availability of subsistence resources; through interference with subsistence harvest patterns; and stress due to fears of long-term implications of the spill (MMS 2007d as referenced in MMS 2008).

As discussed in Section 4.4.14, there are areas in the Alaska region that are of environmental justice concern. Much of the Alaska Native population resides in the coastal areas of Alaska, and subsistence activities of Native communities could be affected by accidental oil spills, with the potential health effects of oil spill contamination of subsistence foods being the main concern. Mitigation measures, cooperative agreements between Native and industry groups, and government-to-government consultations are designed to limit the effects from oil spills.

4.3.2.5 Conclusion

Health effects are discussed throughout this PEIS, as appropriate. The State of Alaska is currently developing an approach to integrate health analysis into the EIS by way of a Health Impact Assessment (HIA) (Berner 2011). An HIA is a scientific method used to assess the potential effects of a policy on the health of a population and the distribution of those effects, and it brings together stakeholders to find a solution (Quigley 2006, CEQ 1981, referenced in Berner 2011). The overall purpose of HIAs is "to inform and influence decision making on proposals and plans, so health protection and promotion are effectively integrated into them" (Quigley et al. 2006). This programmatic-level EIS acknowledges that there will be impacts on human health, both positive and negative, from the proposed action, but it is a broad-level document discussing the impacts over entire planning areas. It would be more appropriate to discuss impacts to site-specific populations at the lease sale level when a better understanding of who will be affected is clear.

4.3.3 Invasive Species

EO 13112, *Invasive Species*, defines invasive species as species that are non-native (or alien) to the ecosystem under consideration and whose introduction causes or is likely to cause economic or environmental harm or harm to human health. Invasive species can be plants, animals, or pathogens. Nationwide, invasive species are associated with environmental damages and losses totaling over $138 billion annually (Pimentel et al. 2000). More than 50,000 invasive species have been documented to date in the United States, and roughly 42% of threatened and endangered species in this country are considered at risk primarily because of invasive species

(Pimentel et al. 2005). Effects of invasive species can be devastating on both habitat and native species and may (1) include a decrease in biological diversity of native ecosystems, (2) decrease the quality of important habitats for native fish and invertebrate species, (3) reduce habitats needed by threatened and endangered species, (4) increase direct and indirect competition with aquatic plants and animals, and (5) pose human health risks (http://www.invasivespeciesinfo.gov/whatis.shtml).

Oil and gas activities may play a part in the introduction of invasive species or may provide substrate and habitat encouraging the establishment of invasive species. Drillships and semisubmersibles are used and relocated throughout the world's oceans. Over time, fouling, encrusting, and boring organisms will attach to these devices. Unintentional introductions may occur when these drilling rigs are relocated to a new region such as the GOM. These same drillships and semisubmersibles may transport and release ballast water containing invasive plankton, larval invertebrates, or even fish, which may then become established due to the availability of acceptable habitat, plentiful food supply, and lack of predators.

Since 1998, there have been at least 16 documented cases of rigs being brought into the GOM from other parts of the world. Some rigs operating in the GOM were constructed or recently modified in Singapore, Taiwan, and Scotland. Newly built rigs undergoing their last year of construction stand in waters of surrounding shipyards. A year is sufficient time for fouling and encrusting organisms to colonize rig surfaces. One large semisubmersible was kept in Mobile Bay, Alabama, for 1 yr. Prior to being placed in Mobile Bay, it had spent 6 months drilling off the coast of Trinidad.

Oil and gas drilling rigs, platforms, and pipelines provide substrate and habitat for sessile organisms. Invasive mussels, barnacles, and corals are known to use rigs and platforms as attachment sites. Many marine organisms require hard surfaces to use as attachment sites for all or part of their natural history. Jellyfish have a polyp stage that requires hard substrate. Polyps settling on rigs in one location and then transported to another region can asexually reproduce. One polyp can produce up to 300 new jellyfish. Currently, there are thousands of oil and gas platforms in the GOM, each of which can provide a hectare or more of hard substrate that can support algae, mollusks, and other sessile invertebrates (Atchison et al. 2008). No-activity-zone natural reefs provide 104.5 km^2 (40.3 mi^2) of hard substrate, which could be used for settlement sites.

Above-water platform structures may also encourage the colonization of new habitat by invasive species. Many migratory bird species use the platform structures as stopover spots while crossing the GOM (Russell 2005). Ongoing research funded by the BOEMRE is studying the interactions between migrating birds and oil and gas structures off the Louisiana coast.

A number of invasive species have been recorded from the OCS planning areas considered for oil and gas leasing in the proposed action. In the GOM, invasive species reported since the mid-1900s include the brown mussel (*Perna perna*), the Australian spotted jellyfish (*Phyllorhiza punctata*), the pink jellyfish (*Drymonema dalmatina*), two species of hydroids (*Cordylophora caspia* and *Garveia franciscana*), a sea anemone (*Diadumene lineata*), a polychaete worm (*Hydroides elegans* and *Ficopomatus enigmaticus*), the Atlantic copepod

(*Centropages typicus*), four barnacle species (*Balanus amphitrite*, *B. reticulatus*, *B. trigonus*, and *Tetraclita stalactifera stalactifera*), and four species of isopod (*Sphaeroma walkeri*, *S. terebrans*, *Limnoria* spp., and *Ligia exotica*). Some of these species are native to other parts of the world (e.g., the brown mussel is native to Africa and South America), while other species are native to North American marine habitats but not to the GOM (e.g., the Atlantic copepod *Centropages typicus*). Suggested avenues of initial introduction of these various species include discharge of ballast water, dumping of ballast rock, or attachment to vessel surfaces.

Although invasive species are a worldwide problem, Alaska has far fewer invasive species compared to the rest of the nation (Piorkowski 2003a). Relatively few aquatic invasive species have been introduced and become established in Alaska compared to other States. This is, in part, due to Alaska's plant and animal transportation laws, geographic isolation, northern climate, small human population, and relatively few concentrated disturbed habitat areas (Fay 2002). However, a non-native amphipod and a colonial tunicate have been found in Alaskan waters. Potential introduction pathways include the movement of large ships and ballast water from the United States west coast and Asia, and the relocation of previously used docks and pier timbers (ADFG 2011). While invasive species impacts, to date, are low, potential threats must be monitored because a significant portion of Alaska's economy, including sport and commercial fishing, depends upon the pristine and natural quality of its aquatic ecosystems. Climate change may also affect the ability of marine invasives to become established (Invasive Species Advisory Committee 2010). For example, changes in water temperature or precipitation regimes (and associated runoff into coastal waters) may make areas more favorable for an invasive species to become established or spread.

Exploratory drilling of Federal leases offshore of Alaska requires bringing rigs and/or vessels to Alaska. Such rigs or vessels may come from the GOM, the West Coast, or foreign waters and be contaminated with species alien to Alaska. Such species may be attached to the hull structure (e.g., sponges and barnacles), hitch a ride on the vessel (e.g., rats, insects, crustaceans, and mollusks), or be transported via ballast water (e.g., crustaceans and mollusks). Once brought to Alaska, alien species contaminating a rig or vessel may subsequently disperse into Alaska's ecosystems.

Although introduction of invasive species to Alaskan waters could occur through the import and placement of offshore oil/gas structures, the threat has not been considered significant. The Alaska Aquatic Nuisance Species Management Plan (Fay 2002) considers activities other than oil/gas structures major pathways for the introduction of aquatic alien species, including aquaculture; aquarium trade; biological control; boats, ships, and aircraft; channels, canals, and locks; live bait; nursery industry; scientific research institutions, schools, and public aquariums; recreational fisheries enhancement; restaurants; and seafood retail and processing.

Vessels, including those used by the oil/gas industry, do pose more potential for introducing invasive species than oil/gas structures. For example, Hines and Ruiz (2000) reported finding 13 species of crustaceans and 1 species of fish arriving at Port Valdez in the ballast water of oil tankers voyaging from San Francisco Bay or Long Beach, California. The issue of invasive species and ballast water is managed by the USCG under the National Invasive

Species Act of 1996. The USCG has promulgated regulations (33 CFR Part 151) to make compliance with ballast water guidelines mandatory. Therefore, oil- or gas-related vessels are required to abide by these requirements in order to reduce the potential for introduction of invasive species.

4.3.4 Risk of a Low-probability, Catastrophic Discharge Event

4.3.4.1 Introduction

The risk of potentially severe consequences of oil spills, especially the risk and consequence of low-probability, large volume spills, is an issue of programmatic concern. Although unexpected and accidental, large spills may result from OCS exploration or development operations involving facilities, tankers, pipelines, and/or support vessels. Incidents with the greatest potential for catastrophic consequences are losses of well control with uncontrolled releases of large volumes of oil, where primary and secondary barriers fail, the well does not bridge (bridging occurs when the wellbore collapses and seals the flow path), and the flow is of long duration (Holand 1997). The term "catastrophic discharge event" is used in this section to describe an event that results in a very large discharge into the environment that may cause long-term and widespread effects on marine and coastal environments.

In general, historical data show that loss of well control events resulting in oil spills are infrequent and that those resulting in large accidental oil spills are even rarer events (Anderson and Labelle 2000; Anderson in preparation; Bercha Group 2006, 2008; Izon et al., 2007). The Norwegian SINTEF Offshore Blowout Database, which tracks worldwide offshore oil and gas blowouts, where risk-comparable drilling operations are analyzed, supports the same conclusion (IAOGP 2010). New drilling regulations and recent advances in containment technology may further reduce the frequency and size of oil spills from OCS operations. However, as the 2010 DWH event illustrated, there is a small risk for very large spills to occur and result in unacceptable impacts, some of which have the potential to be catastrophic.

A fundamental challenge is to accurately describe this very small risk, especially since there have been relatively few large oil spills that can serve as benchmarks (Scarlett et al. 2011). Prior to the DWH event, the three largest spills on the OCS were 80,000, 65,000 and 53,000, and all occurred before 1971. From 1971 to 2010 there were 253 well control incidents, 53 of which spilled oil. Excluding the DWH event, less than 2,000 bbl were spilled from these 53 well control incidents. During this same period, more than 41,500 wells were drilled on the OCS and almost 16 Bbbl of oil produced. The National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling has recently argued for a more rigorous and transparent oil spill risk and planning process to support government and industry decision making (2011). At the present time, there is a not an ideal, standardized approach to characterizing the risk of spill occurrence and consequence across all relevant space and time scales, consistent with inherent uncertainties associated with different regional factors and different exploration or production operations (Pritchard and Lacy 2011).

Historically, BOEM has characterized oil spill risk using the Oil Spill Risk Analysis (OSRA) model to identify the risk of oil released from numerous locations on the OCS contacting environmental resources. BOEM performs OSRA modeling in support of individual lease sales and certain exploration/development plans. BOEM also considers risk during the review of an operator's Exploration Plan, Development and Production Plan (or Development Operations Coordination Document), and/or Application for Permit to Drill (APD). The same OSRA runs often form the basis for spill risk and resource contact analysis in industry-submitted plans. The APD describes the drilling procedures and technology that are planned to be used to drill a specific well under the specific geologic, geophysical, and environmental conditions that exist at the site. BOEM evaluates the APD to determine whether the operator's drilling plan is appropriate for the drilling risk of the site.

Industry often prepares sophisticated, well-specific risk assessments for exploration or development wells. The hazards-based or well-specific approach can use event-tree, fault-tree, and "safety case" analytical methods (Cooke et al. 2011; DNV 2010). Well-specific quantitative risk analysis (QRA) is frequently performed by operators (e.g., Mechanical Risk Integrity, BlowFAM, BowTieXP), where risk is quantified and compared to acceptance criteria and thresholds. Such quantitative risk analysis considers formation/well characteristics, technology and procedures, and human error/management (which is frequently a root cause of many well control incidents). The recently promulgated Safety and Environmental Management System (SEMS) rule, building on API Recommended Practices (RPs) 14C, 14J, and 75, now requires all OCS operators to identify, address, and manage safety and environmental hazards during design, construction, start-up, operation, and maintenance activities.

To support the planning decision involved in establishing a 5-yr schedule of lease sales, detailed analyses of highly variable, region-specific and/or well-specific risk is neither feasible nor appropriate. At this decision juncture, the critical realization is that the risk of a spill with catastrophic consequences albeit small, is not zero. Different OCS regions and operations may have different risk profiles (Scarlett et al. 2011). This section assesses the importance of different catastrophic discharge event risk factors in different program areas. This discussion is presented to bring into focus critical risk factors, acting individually or in combination, that may occur in program areas so that additional consideration is given to these issues during the Program. In addition, recent regulatory changes implemented since the DWH event that BOEM believes contributes to risk reduction are summarized.

4.3.4.2 Risk Factors Influencing Occurrence, Size, Containment, Response, and Fate/Consequence of a Catastrophic Discharge

Risk is the combination of the probability of an event and the magnitude of the consequences of that event. While BOEM primarily analyzes spills in context of routine small spills and accidental large spills, this programmatic discussion on risk focuses on low-probability, very large volume, long-duration OCS spills with the potential for catastrophic effects (40 CFR 1502.22). Such a catastrophic discharge event may result in "large-scale damage involving destruction of species, ecosystems, infrastructure, or property with long-term effects, and/or major loss of human life" (Eccleston 2010). Such a spill is defined by the

National Oil and Hazardous Substances Pollution Contingency Plan as a "spill of national significance" or "a spill which due to its severity, size, location, actual or potential impact on the public health and welfare or the environment, or the necessary response effort, is so complex that it requires extraordinary coordination of federal, state, local, and responsible party resources to contain and cleanup the discharge" (40 CF. Part 300, Appendix E). For a spill to be considered a catastrophic discharge event, its potential discharge volume must be such that catastrophic effects could occur. As previously discussed, long duration uncontrolled flows from a well control incident provide the greatest volumes of potential flow and are the spill sources considered in this section. A scenario of maximum spill volume and duration is presented in Table 4.3.4-1, describing catastrophic discharge characteristics in different program areas. The discharge rate, volume, extent, and duration varies with geologic formation, well design, and engineering characteristics, spill response capabilities, and time to containment. The potential volume of oil that could enter the environment fundamentally depends on the success of intervention, containment, response efforts at the incident site, or the length of time needed to stop the flow from the well by drilling a relief well. The effect of discharged oil not recovered is influenced by various weathering processes and response measures, such as use of dispersants and burning. The potential adverse effects also vary with time of year and location of release relative to winds, currents, land, and sensitive resources, specifics of the well (i.e., flow rates, hydrocarbon characteristics, and infrastructure damage), and response capability (i.e., speed and effectiveness). A catastrophic discharge event does not inherently equate to a spill with catastrophic effect. Instead, impacts depend critically on the spill size, oil type, environmental conditions, resources present and exposed, toxicity and other impact mechanisms, and population/ecosystem resilience and recovery following direct exposure.

Industrial Economics, Inc., and Environmental Research Consulting, under contract to BOEM, identified a suite of factors that may contribute to loss of well control and affect the size and duration of catastrophic discharge event, differences in efficacy of containment and response, and differences in fate. They include the following:

- Geologic formation and hazards;
- Water depth and hazards;
- Geographic location (including water depth);
- Well design and integrity;
- Loss of well control prevention and intervention;
- Scale and expansion;
- Human error;
- Containment capability;
- Response capability;

TABLE 4.3.4-1 Risk Factors That Affect a Catastrophic Discharge Event

Risk Factors	Factors That Affect Occurrence	Factors That Contribute to Catastrophic Consequences
Geology	Drilling location, drill depth; mature vs. frontier areas Reservoir pressure and volume Seabed complexity Shelf hazards	Larger reservoir volume Higher reservoir pressures Uncertainty associated with drilling in frontier areas
Water Depth	Increased water depth increases complexity of operation	Shallow water depth increases probability of contact with humans, sensitive species and sensitive environments
Well Design and Integrity	Drill string length Cementing and casing design Well integrity New technologies (e.g., associated with expansion) Prevention systems (e.g., BOPs, Backup control systems, ROVs) Human error Scale of operations and expansion	Exploratory drilling and improper well construction Prevention system failure Source of blowout: wells and platforms (as opposed to pipelines) Human error, often involving lack of understanding of new technologies
Loss of well control prevention and intervention	Improperly maintained equipment	Mechanical failure Equipment failure
Scale and expansion	Complexity of operations both physical and operational Human error Coordination and management	Human error Coordination and management
Human error	Lack of training and preparedness Extreme working environments	Lack of training Failure to take precautionary measures
Containment Capability	N/A	Subsea vs. surface containment
Response Capability	N/A	Distance from shore (duration) Response capability in remote areas Capping at the well vs. drilling relief well vs. chemical and mechanical response
Geography	Region-specific meteorology: temperature, extreme weather, prevalence of ice	Distance to shore: proximity to coastline increases probability of catastrophe Hurricanes associated with high-volume spills

TABLE 4.3.4-1 (Cont.)

Risk Factors	Factors That Affect Occurrence	Factors That Contribute to Catastrophic Consequences
Oil types, weathering and fate	Temperature of oil: higher oil temperatures and lower water temperatures (e.g., Arctic) increase likelihood of breakage Tidal patterns Currents and hurricanes	Oil weathering and evaporation Mechanical recovery, dispersal, or burning Transport/ice Oil persistence Ambient temperatures affect rate of oil flow from blowout location

- Oil types and weathering/fate; and
- Specific regional geographic considerations, including oceanography and meteorology.

Many of these factors apply to drilling, abandonment, containment, response, and effects of the event and contribute to the overall catastrophic discharge risk associated with an OCS area, or even a particular well. The interplay of these factors is relevant to evaluating the risk of a catastrophic discharge event and ensuing consequences (Table 1). As the BP report concluded on the DWH event, a complex series of connected mechanical failures, human judgments, engineering design mistakes, and operational, implementation, and team interactions often contribute to incidents (BP 2010). Many of the risk factors are interrelated, and some factors both increase and decrease cumulative risk depending upon whether one is evaluating the risk of occurrence or the consequence of that occurrence. Moreover, some risk factors may contribute to more or less risk depending on the specific situation.

4.3.4.2.1 Loss of Well Control Occurrence.

Geologic Conditions. Depending on the region, the geology of the OCS varies greatly in character and oil and gas exploration potential. Risk assessments of mature areas (areas where prior drilling operations have occurred) benefit from previous geological exploration and well development. Alternatively, frontier areas, such as the Arctic, are relatively underexplored and do not have long registries of geological data or previous attempts at well drilling. This adds additional risk to frontier operations. Though improvements in seismic technology allow three-dimensional modeling of sub-seafloor geology, frontier areas inherently are characterized by greater risk (USGS 2011; National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling 2011). Geologic data in deepwater and ultra-deepwater frontiers in the GOM is growing, as is the industry's understanding of the geological variability and risks, especially as operators continue to develop leases tied to these oil-rich areas.

Because of variations in shallow and deep geologic framework, exploration and drilling often encounter numerous challenges including shallow hazards, such as seafloor instability,

shallow water flow, permafrost, and gas hydrate, shallow gas and sour gas zones, as well as relatively deeper hazards, such as salt, and tar zones (Close et al. 2008; Nuka and Pearson 2010; Shaughnessy et al. 2007). In deepwater reservoirs in the GOM, narrow margins in pore pressure and fracture gradient, over-pressurized and low pressure zones, and reservoir compartmentalization (including low flow assurance) can represent key engineering challenges (Cunha et al. 2009; IHS/GPT 2011). Such geological differences across the different regions represent key concerns for the potential influence geology exerts on wellbore integrity, a key element in drilling and developing wells.

Most of the larger reservoirs being targeted on the shallow GOM shelf produce natural gas. There are comparatively fewer plays capable of very large oil discharges as compared to deep water. In shallow water, the relatively lower formation pressure typically results in a higher margin of safety, although encountering shallow gas represents a substantial hazard. The pressure margin allows operators to change the weight of the drilling mud by several pounds per gallon to balance formation pressures. In additional, a large number of shallow-water wells actually require positive external stimulation to produce and facilitate flow of the product from the drilling site.

In general, geologic pressure (pore pressure) and temperature increase with depth. Offshore oil reservoirs can be highly pressurized and compressed under thousands of feet of unconsolidated sediment, salt bodies, and sedimentary rock. The true vertical depth of some reservoirs may exceed 9,144 m (30,000 ft). Deep wells are known to have pressure ratings exceeding 20,000 pounds per square inch (psi) (USDOI 2010; Midé 2010). As pressure and pressure gradients increase, drilling operations become more challenging and necessitate careful balancing of pressures to prevent either the collapse of the well (from excessive pore pressures) or fracturing of the rock and loss of circulation (from excessive drilling pressure). Deeper reservoirs also tend to feature larger volumes of oil. In the event of a well blowout, wells tapped into larger reservoirs can potentially release more oil into the environment and at greater discharge rates since flow rates depend in part on temperature and pressure. Uncontrolled flow rate, or "open flow potential," can be over 100,000 bbl per day.

Water Depth: Rig and Well Complexity. Water depth alone is not a strong predictor of well control incidents, but it is related to the complexity of technology and operations (Jablonowski 2007; Malloy, 2008; Cohen and Krupnick 2011). Exploration wells are most often drilled in open water where no platform exists. Jackups, submersibles, semisubmersibles, and drillships, collectively referred to as mobile offshore drilling units (MODUs), are commonplace in exploration drilling, whereas modular rigs installed on platforms are more commonly used in production wells. Drilling of a production well often involves interaction with a production platform and the existing wells on the platform. Water depth not only drives the drilling technology, but also influences well design and construction practices, as well as safety measures used to mitigate risk of well control incidents. As oil prices remain relatively high, exploration and production firms venture into deeper waters where larger reservoirs of oil are known to exist. While contingent on a number of factors, deepwater and ultra-deepwater oil operations may have higher safety incidence rates owing to rig complexity, although there have been and continue to be a greater number of loss of well control events in shallow water (Shultz 1999; Jablonowski 2007; Izon et al. 2007; Cohen and Krupnick 2011).

Alhough definitions of exact depth ranges vary, shallow water depths are generally defined as less than 200 m (656 ft). Shallow water exploration and development rigs involve comparatively simple well construction, allow direct access to well control prevention mechanisms, are less susceptible to deepwater currents (although waves and strong coastal currents are in play), and do not face complications with pressure and temperature variations found with deepwater and ultra-deepwater wells. In addition, shallow water depths allow surface blowout preventer (BOP) placement where preventative maintenance and service can be done directly by rig operators. At the same time, GOM infrastructure in shallow water tends to be older and may be more prone to mechanical failure. Depending on water depth, OCS exploration wells in the Arctic may be drilled from an artificial island; large, usually bottom-anchored drilling structures; or a drill ship.

The greater complexity of wells and specialized equipment used on deepwater and ultra-deepwater rigs may present more opportunity for mechanical breakdown and accidents (Jablonowski 2007). Well complexity increases the number of routine operations and incidence of unusual operations, such as stuck pipe and complex casing and cementing programs (Jablonowski 2007). Complexity also increases the number of individual tasks that need to be performed on a well, complicating procedures and communication.

Deepwater depths are roughly defined as seabed depths that exceed 200 m (656 ft) but are less than 1,500 m (4,921 ft). Because of the extreme depths of deepwater drilling, these operators can no longer utilize traditional fixed platforms directly on the seabed, and different technologies and procedures are required. Deepwater drilling rigs are multi-point moored to the sea floor or, more recently, dynamically positioned. More complex operations such as mooring, station keeping, riser management, and deepwater well control may complicate operations and increase the number of procedures prone to errors and equipment prone to failure. The newest platforms incorporate advanced technology, about which few data on long-term success or incidents have been gathered (USDOI 2011b). The technologically advanced BP Thunder Horse platform, for instance, intended to be BP's largest producer in the GOM, flooded because of the backward installation of a valve. Deepwater wells require subsea BOP placement at depths unreachable for human service; ROVs become necessary. Maintenance, repair, and assurance of proper functioning of such mechanisms are more difficult at greater depths.

Ultra-deepwater is a relatively new class of wells defined as exceeding wellhead depths of 1,500 m (4,921 ft). Similar to deepwater platforms, ultra-deepwater rigs are floating semi-submersibles and dynamic positioned drill ships. Ultra-deepwater wells require intricate and complex platforms, structures, and equipment to operate. High hydrostatic pressures and low ambient temperatures in such deep waters necessitate heavier and more specialized equipment. The extended depth demands larger platforms and operating rigs to handle the added drilling materials, as well as storage capacity.

Well Design and Integrity. Well construction is a process with numerous stages preceding well abandonment or production. Construction of an offshore well involves different types of setting agents, pipe, casing, cements, wellhead technology, rigs and platforms, drilling muds (synthetic or water based), and cleaning/preparation agents. These differ by environment,

with deepwater wells requiring distinctly different construction and technologies to withstand conditions at extreme hydrostatic pressures and lower temperatures.

Since the process of sub-seabed drilling cannot be directly observed, drilling operators in an offshore environment are reliant on secondary indicators to ensure proper construction of the well. Geophysical imaging, pressure readings, and reclaimed fluid testing are some of the secondary indicators used in drilling at depth. Though these tests lend accuracy in mapping pressure zones, impediments such as pockets of gas, shallow water flows, faults, salt deposits, or rubble zones are not always forecast.

The primary function of a well system is to reliably contain, control, and transport hydrocarbons to the surface. In general, risks are determined by well bore parameters and an operator's familiarity with the well bore. Drilling engineers must constantly monitor pore pressures, fracture gradients, fluid circulation, and abnormal pressure zones to avoid loss of well control. When drilling into frontier or new reservoirs, limited knowledge of wellbore parameters can increase risk of accidents. The number of barriers are often scaled with the likely consequence of failure; multiple barriers are often used to achieve adequate reliability and avoid leaks. Complex hole sizing, drilling string, wellhead technology, and mud programs, as well as casing and cementing designs are required to reach target depths in deep water and ultra-deep water. Mud, casing, and cementing programs must be designed, refined, and implemented as well bore parameters and formation characteristics are being monitored.

Drilling mud/completion fluid pressure is the primary well control barrier for drilling and well intervention operations (PCCI 1999). When this fluid hydrostatic pressure drops below that of the formation, a kick occurs, which means that formation fluid enters the wellbore. Casing and cementing programs, diverters, BOPs, and wellheads can provide backup (secondary or redundant) barriers to prevent a blowout when a kick occurs. Casing and cement, as well as drilling or completion fluids, are used to ensure the fluids in a formation do not enter the wellbore during drilling and completion operations. For production operations, a packer/tubing string and tree may provide the primary well control barrier. The production casing and wellhead system provide a backup barrier in case of a packer or tubing string leak.

In 2008, BOEMRE published guidelines on the various steps towards managed pressure drilling, a process that avoids the continuous flow of formation fluids, to facilitate better planning of drilling operations (Eschenbach and Harper 2011). Further drilling safety procedures and practice guidelines have been submitted by BOEMRE in recent years due to the 2010 DWH incident, including the new Drilling Safety Rule and SEMS rule. Under these and other rules, drilling practices must properly address and manage known and possible risks with adequate mitigation and safety technology (USDOI 2010; USGS 2011).

Well integrity issues arise with the cement used in construction. Fluids used to clean and prepare the well for cement are either water-, synthetic-, or oil-based, which can contaminate cement. At sub-seabed depths of 5,486 m (18,000 ft) or more, heavy cleaning fluids run the risk of not filling their intended purpose and contaminating subsequent cementing jobs. Cementing problems were associated with 18 of 39 blowouts between 1972 and 1999 in the GOM (Izon et al. 2007). However, the majority of these cement-related blowouts were of short

duration, primarily released natural gas, and involved shallow strings in a well-surface casing. Mechanical indicators such as negative pressure testing and pressure and heat gauges to test cement integrity have also come under scrutiny for lack of accuracy; the pressure gauges used for negative pressure testing for Macondo were accurate to ± 400 psi, a rather imprecise measure (OPG 2011). It is presumed both cementing issues and mechanical failure may have been a factor in the Macondo well blowout (National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling 2011; JITF 2011).

When considering the risk of loss of well control, it is important to distinguish among the different types of wells, including exploration, development, and production wells. Exploration wells are drilled in open water from a mobile offshore drilling unit, whereas production and development wells are often drilled under an existing platform. In general, exploration may involve greater uncertainty due to the availability of geologic data, nature of drilling technology, and unique barrier factors, such as BOP placement (Eschenbach and Harper 2011). From 1971 to 2010, there have been over a total of 41,781 wells drilled in the OCS. Of these, 26,245 were development wells, 15,491 were exploration wells, and 43 were core tests or relief wells. The overall OCS well control incident rate for drilling was 1 loss of well control incident per 292 wells drilled (1 per 201 for exploration wells, and 1 per 410 for development wells). These well control incident rates include all well control incident rates related to drilling operations whether or not a spill occurred. Despite the increased risk of drilling wells on undeveloped frontiers, procedures followed in drilling exploratory wells may be more conservative (i.e., safer) to account for this increased level of uncertainty (Eschenbach and Harper 2011).

In the GOM from 1980 through 2004, there was a relatively higher number of well releases during development drilling and well workover operations as compared to exploration drilling. This contrasts with worldwide trends where more well releases tend to occur during exploratory drilling (Holand 2006). Holand (2006) attributes this to the fact that more development wells are actually drilled. Hurricanes or ship collisions caused approximately 50% of the production blowouts (Holand 2006). Simultaneous operations of drilling and production also increase the risk of incidents when drilling production wells. Another root cause of sustained blowouts during completion and workover is the positive potential for pressurized hydrocarbons and limited bridging tendency with flow through perforations or gravel pack (Flak 1997).

In general, the riskier wells include wildcat wells (first well into formation), offset wells (wells drilled near another well that encountered drilling trouble zones or past well control problems), and extended or ultra-deep drilling (SPE Advisory Summit 2011). Deepwater and ultra-deepwater wells require complex infrastructure, planning, and execution to construct; therefore, facilities and volume of production tend to get larger with distance from shore and water depth (Shultz 1999). The complex nature of the formations, combined with the drilling depths in high-pressure/high-temperature conditions required to reach the target zones, presents a challenge to drilling engineers (Close et al. 2008). This challenge is highlighted in the greater number of casing strings required to drill to target depth, which in turn creates the challenge in achieving good cement isolation in a tight tolerance annuli (Close et al. 2008; Chatar et al. 2010). Despite such challenges, over 2,300 deepwater development wellbores and approximately 2,600 deepwater exploration wellbores have been drilled. Of these, the Macondo well is the only

exploration well to involve a blowout and large oil spill. No spills have occurred for deepwater development wells.

Loss Well of Control Prevention and Intervention. A blowout occurs when there is failure to control a kick and regain pressure control, and can be defined as an uncontrolled flow of formation fluids. Oskarsen (2004) classifies offshore operations blowouts in three groups:

- Surface blowouts characterized by fluid flow from a permeable formation to the rig floor;
- Subsurface blowouts characterized by fluid flow at the well at the mudline, where the exit conditions are controlled by the seawater; and
- Underground blowouts characterized by fluid flow from one formation zone to another, typically by using the wellbore as a flow path.

Potential scenarios for each blowout type are described in Oskarsen (2004). Blowout rates by different phases of exploration and production operations and relative water depths are available in Holand (2006). Although high hydrostatic pressures at depth will aid in choking any flow from potential blowout points (PCCI 1999), two independent barriers are typically used for well control. The primary barrier is usually the hydrostatic pressure exerted by the well mud/synthetic fluid column (either static or dynamic). The secondary barriers typically include the pressure control equipment such as the BOP, the diverter system, the wellhead (innermost casing hanger seal), and the choke/kill line valves. These barriers are routinely used during drilling, completion and workover operations. If the well is flowing (i.e., producing oil and/or gas), the primary barrier is that closest to the reservoir (PCCI 1999).

Individual BOP systems are used during drilling operations to prevent unrestrained release of crude oil from reservoirs. BOPs are composed of all systems required to operate them, including flexible joint, annular preventer, ram preventer, connector, choke and kill lines, choke manifold and auxiliary equipment (USDOI 1996). The specific type of BOP may influence the loss of well control and well releases. For example, fault tree analysis in the DNV Beaufort Sea Study showed that there is substantial risk reduction with BOPs having two sets of blind shear rams spaced at least 1.2 m (4 ft) apart. The study concluded that the reliability of a two blind shear system is 99.32%, compared to 99% for a single blind shear ram (Midé, 2010). Despite the seemingly low percentage, an increase of 0.32% in BOP reliability raises the estimated number of wells that can be drilled before an uncontrolled blowout to 6,213 from 4,225 (Midé 2010).

In shallow-water wells, BOPs are placed above the sea on the rig, allowing for periodic repair and maintenance. The operations of surface BOPs are not subject to all of the complicating factors associated with subsea BOPs, and they are more accessible for repair and intervention. However, surface BOPs that are placed on floating facilities (as opposed to jack-up rigs) present other significant risks. The high-pressure riser and casing from the seafloor to the rig can be exposed to dynamic stresses. A failure of a high-pressure riser due to these stresses can lead to uncontrolled flow below the surface BOP system located on the floating facility. Well operations from a floating platform with a surface BOP stack and a high-pressure riser

(through the water column) are higher risk operations than drilling from a jack-up rig or a fixed platform. The single high-pressure riser (or in some cases, a dual riser system) used by floating platforms is subject to environmental forces such as current induced vibration that make it more susceptible to stress fatigue. Jack-up rigs and fixed production platforms have more casing strings tied back to the surface of the rig or platform, which provide additional external support for the pressured casing. In addition, because these tied-back casing strings are used in shallower water operations with a shorter water column, they are less exposed to current-induced stress.

Deepwater and ultra-deepwater wells have subsea BOPs that are affixed directly to the well on the seafloor. Deepwater and ultra-deepwater seafloor depths exceed depths at which human operators can work, thus requiring submersibles and emergency backup control systems. These systems can demonstrate failures. For example, the main control system of BOPs has a failure rate of approximately 50% at depths of 800–1,200 m (2,625–3,937 ft), and approximately 7% at depths of 1,200–2,100 m (3,937–6,890 ft) (Midé 2010). Midé (2010) suggested that this is because less variability exists in relatively calmer waters at deepest depths (e.g., currents and marine life do not affect machinery as much in deep water). Important technology includes the acoustic backup system, which communicates with the BOP system in the event of electrical and hydraulic connection loss with the wellhead. DNV (2010) reported a 25% reliability of current acoustic backup systems. ROV activation of the BOP using the secondary control system has a 75% success rate.

Overall, more research and development is necessary to increase the success rates of control systems in order to reduce the risk of deepwater drilling operations. Evidence for the containment response to the DWH incident, as well as a review of industrial and governmental containment response, suggests that mitigation technology has not kept pace with extraction technology that enabled industry to drill in increasingly deeper waters (IPIECA 2008; Cohen et al. 2010). However, industry and regulatory enhancements are under development to address control systems (USDOI 2010; DNV 2010).

Scale and Expansion. Scale and expansion of OCS operations increases the complexity of drilling and production operations. Factors associated with scale include the number of wells, new types of production facilities, new methods of transporting oil, higher levels of production, the addition of simultaneous operations during production, and higher rates of pumping. Expansions in scale of oil production require more well and platform construction, along with higher production volumes. New technologies necessitated by an increased scale of operations may be associated with higher levels of risk, especially when technologies are not fully developed. The number of incidents reported increases with more complex operations, in particular with deepwater operations which, by their very nature, often entail greater scale, expansion, and complexity (Cohen and Krupnick 2011). Large-scale oil production involves the use of subsea well complexes and large central processing and storage facilities, about which little data on long-term success and incidents have been gathered. The OCS operations in the GOM are moving farther offshore and incorporate more complex drilling and production operations. For example, the Shell Perdido Project is simultaneously connected to 22 different wellhead sites (Shell 2011b). A production facility of this scale, in addition to being in ultra-deep water, typifies the trend in scale and expansion (Shell 2011a).

More complex facilities and operations require equally complex management structures. Operations of greater scale entail a complex set of relations between different operators, contractors, and management groups. While the probability of release on more complex facilities has not been actively studied, it is noted that the Macondo well suffered from insufficient correction of known concerns prior to blowout because of management and communication issues between operators and contractors (National Academy of Sciences 2010; JITF 2011).

Human Error. Human error, or combinations of human and mechanical failure, are the root cause of many OCS accidents and spills (Jablonowski 2007; Muehlenbachs et al. 2010). Low-probability, high-impact failures such as the Macondo well blowout indicated more stringent requirements were necessary (Winter 2010; DOI 2010). In the case of the Macondo well, operators misread pressure readings, authorized high-risk activities, disregarded warning signs, and overlooked the checks and balances that exist in regulatory assignments, while mechanical BOP failure compounded the severity of the release (Winter 2010; National Oil Spill Commission 2011). The new SEMS rule recognizes this gap and establishes a mandatory program to ensure OCS operators identify, address, and manage safety and environmental hazards and impacts during design, construction, start-up, operation, inspection, and maintenance activities. This systemic approach to managing risk and ensuring safety and environmental protection should provide more focus on the risk of system failures as well as on the human factors that could contribute to an incident (SPE Advisory Summit 2011).

Level of training and safety culture are important factors in determining the number of safety and well control incidents (Jablonowski 2007; Vinnem et al. 2010). A well-trained crew that has participated in numerous practice exercises will decrease the probability of a spill caused by human error. Lack of proper training has been a significant issue in the last decade, probably because of a lack of incidents (Etkin 2011). Previously, standard industry practice often permitted operation of technical equipment with on-the-job training or one-week training courses. The MMS published final regulations for Well Control and Production Safety Training (30 CFR 250, SubpartO) in 1997 (amended on August 14, 2000). Recently, the advent of new regulations (the SEMS rule) and requirements for personnel on platforms and working on drilling operations aims to eliminate the current gaps in industry-required trainings. Individuals working in specific technical jobs are now required to attend annual training and certification, and operators are required to perform job safety and hazards analyses (DOI 2010; BOEMRE 2010; OGP 2011). Other factors such as climate and temperature could affect worker performance. For instance, colder temperatures in the Arctic lead to higher probabilities of human error due to the extreme working conditions (Eschenbach and Harper 2011).

4.3.4.2.2 Containment and Response. The effectiveness of containment and spill response dictates the amount of oil released in the environment. Area and operation-specific oil spill contingency plans, as well as actual containment and response efforts, will be designed around many of factors that contribute to the risk of spill occurrence and fate of oil in the water. Assuming the correct containment plan is in place, the risk of poor planning and containment execution still exists (USCG 2011).

If the BOP fails, other options are available to control the blowout, including capping/shut-in, capping/diverting, surface stinger, vertical intervention, offset kill, and relief wells (Neal Adams Firefighters, Inc. 1991). Of these methods, a relief well is often considered most important, and may be required immediately (even if it is not the first choice), since it is typically considered the principal solution for well control. The amount of time required to drill a relief well may depend upon the complexity of the intervention (e.g., depth of formation), the location of a suitable rig, the operations that may be required to release the rig, and any problems mobilizing personnel/equipment.

Once the oil has reached the sea's surface, the first few hours of a spill are the most critical for response efforts. Boomers and skimmers should be deployed immediately to contain the oil and *in situ* burning and dispersant use should be evaluated to supplement mechanical collection methods. Since *in situ* burning and dispersant use are time sensitive, responders should ensure the necessary supplies for either method (e.g., flame-resistant booms) are available.

If a spill cannot be contained at the site's wellhead (subsea), a response effort may be required to restrict the surface spreading of oil in the water, especially from the shore. The following sections outline the methods of containment, as well as the risks and considerations unique to each.

Water Depth, Distance from Shore, and Other Variables. As shown by the DWH event, the loss of well control in deeper depths presents containment obstacles and challenges that would not necessarily be encountered during a loss of well control in shallow waters. Although many of the same techniques used in shallow water were used to attempt to control the Macondo well, the well control efforts were hindered by water depth, which required reliance solely upon the use of ROVs for all well intervention efforts. This is a concern in deep water because the inability to quickly regain control of a well increases the size of a spill, as occurred during the DWH event. Other complications associated with responding to a deepwater blowout include inaccessibility of the well, methane hydrate formation at lower seafloor water temperatures, and the need to work with larger and less-available support equipment due to the greater water pressure. The inverse relationship holds true for emergency response to spills. The closer the well is to shore, the quicker the potential response.

Distance from shore, coupled with response measures, fundamentally drive the size of the impacted area. Oil-spill contact potential, the likelihood of released oils contaminating areas or materials of interest (e.g., beaches, wildlife, sensitive environments), decreases with greater distance from shoreline (IPIECA 2008; JITF 2010). As physical distance from sensitive areas and shores increases, sea waters, currents, waves, and other biological processes are able to dilute and digest more of the spilled oil. Volume alone does not determine the impact of the releases. Releases close to shore may have greater effects, especially when concentrated into inlets or smaller areas (IPIECA 2008).

In some respects, offshore spill events in the Arctic and sub-Arctic may offer a few advantages to responders. Ice can serve as a natural oil boom and dampen surface waves, while cold weather slows the rate of oil evaporation – making it easier to burn. Shore ice may also

provide a physical barrier, limiting shore contact to oil. However, spill removal companies have testified that icy waters actually make traditional techniques (booming and skimming) significantly less effective (CRRC 2009). A spill during the fall freeze-up would be the most dangerous time for a spill, and even chemical response methods would be limited (Nuka and Pearson 2011). The Arctic is sparsely populated and infrastructure is not abundant. Thus, the ability to appropriately respond to incidents remains a concern (USGS 2011). Ice-free seasons are relatively short (around three months a year), and ice state may influence the ability to drill a relief well. The relatively shallow Arctic depths could result in more contact potential in the event of a catastrophic spill. Should spilled oil persist in the water column, there is concern that suspended oil could become trapped in ice.

Status of Technology to Physically Contain. OCS operators are now required to submit documentation that they are able to deploy adequate containment resources to respond to a blowout or other loss of well control. In general, subsea containment at the wellhead is ideal and most effective because it contains the oil at the source. Perhaps the most significant hurdle to the development of containment at the blowout point (subsea) has been cost (BOEMRE 2010; PCCI 1999). Given the low historical probability of a significant blowout occurrence and limited use of subsea containment equipment, industry development of cost-effective equipment has not historically occurred, although that has changed in response to new regulatory requirements.

As mentioned, containing oil at the wellhead is the ultimate goal in the event of a blowout. However, subsea collector technologies have historically presented some operational challenges given design and installation difficulties (PCCI 1999). For subsea oil containment, the technical hurdles to be overcome during a deepwater blowout include the behavior of deepwater currents; the ability to manipulate heavy objects on the seabed; the ability to design subsea collectors that are flexible enough to cap a large range of subsea wellhead assemblies and accommodate a high volume of recovered oil, gas, and water; the ability to approach the blowing well and install containment devices on the seafloor; and the lack of standardization in subsea wellhead design.

ROVs capable of manipulating heavy objects, especially collector technologies, near the seafloor and in turbulent conditions caused by the blowout, are limited. In fact, even relatively minor blowout plumes have rendered many ROVs useless. Aside from the risk of physical damage from plumes, the following risk factors exist related to ROV use:

- Sufficient surface support or subsea lifting devices such as syntactic foam buoys are required to assist the ROV with heavy object lifting;
- Subsea currents can complicate ROV use; and
- Navigation systems and/or sensors can be damaged from the blowout plume.

In comparison, subsea containment in shallow water is less complicated; for example, it is easier to mobilize equipment and avoid hydrate formation at the relatively warmer seafloor temperatures.

The DWH event and implementation of NTL No. 2010-N10, however, has created new impetus for industry-driven containment technology. For example, Marine Well Containment Company (MWCC) – a partnership between ExxonMobil, Chevron, ConocoPhillips, and Shell – has announced the release of its seabed containment system (Helman 2011). According to the company, the unit features the ability to do the following:

- Contain 60,000 bbl per day of liquid and 120 million standard ft^3 of gas;
- Inject dispersants; and
- Be placed in water up to 3,048 m (10,000 ft) deep.

This system is intended to address the weakness of the BP containment dome that caused its failure during the DWH event (Helman 2011). The system can inject antifreeze-like chemicals to inhibit natural gas hydrate build-up, which created spill containment complications during the DWH event. Of course, whether Marine Well Containment Company's system will work as effectively as it claims will not be known until another blowout event occurs.

Another option for source control and containment is through the use of the equipment stockpiled by Helix Energy Solutions Group, Inc. The Helix initiative involves more than 20 smaller energy companies and supplements the MWCC response effort. Helix has maintained the equipment it found useful in the DWH event response and is offering it to oil and gas producers for use. Together, the ships and related equipment can accommodate up to 55,000 bbl of oil/day, 70,000 bbl of liquid natural gas, and 95 MMcf of natural gas at depths up to 2,438 m (8,000 ft).

Shell is developing equivalent shallow-water containment technology for use in the Arctic. The company is under increasing scrutiny from industry stakeholders to ensure that an event similar to the one that happened in the GOM will not occur in the Arctic. Shell has pre-staged response equipment and vehicles designed for Arctic conditions that can be activated immediately (Dyer 2011). For example, in the 2011 Revised Outer Continental Shelf Lease Exploration Plan, Shell's spill response plan includes oil spill response (OSR) vessels with an ice-capable Oil Spill Response Barge (OSRB) and associated tug (Point Oliktok tug and Endeavor barge), a tank vessel for storage of any recovered liquids (Mikhal Ulyanov), and associated smaller workboats. In addition, Shell's plan includes two vessel of opportunity skimming systems (VOSSs) to assist with containment and recovery, along with an arctic oil storage tanker to provide storage of recovered oil (BOEMRE 2011). Shell has committed to having a pre-fabricated subsea collection system with surface capability to capture and dispose of oil, and has indicated that this system is in final design.

Aside from subsea containment, subsea dispersant injection into the well or blowout jet zone is considered to be one of the most promising measures to contain the *effects* of the oil spill. Design concepts to date require advanced planning to incorporate the appropriate equipment for dispersant injection into the drilling infrastructure/equipment (e.g., subsea stack or BOP). The industry is now focused on wellhead-independent injection systems; this method involves applying dispersants into the blowout plume. As noted above, MWCC's system includes a

subsea injection capability. However, the environmental tradeoffs of subsea dispersant use (similar to surface dispersant use, discussed in the following section) continue to be debated and have been poorly documented based on limited prior application (USEPA 2011b).

Mechanical Recovery Methods. Mechanical recovery methods include the use of booms, barriers, and skimmers, as well as natural and synthetic sorbent materials (NRC 2003). Of all response efforts, mechanical methods exhibit the least impact on the environment and are considered to be the first line of defense against surface oil spread (USEPA 2011d).

Booming and skimming are the two most widely used mechanical containment methods. The effectiveness of these two measures will depend on the volume of the oil spill, location of the well, and sea conditions. For example, at remote open-sea well locations, the immediate availability of sufficient oil storage and/or oil-water separators may be limited (BOEMRE 2010; PCCI 1999). Booms and skimmers become less effective in higher wave swells and wind, and in fast currents. Three main types of skimmers exist, each with characteristics that may make them more effective given certain ocean and spill conditions. Weir and suction skimmers operate best on smooth water with little debris; oleophilic skimmers are the most flexible, can be used on spills of any thickness, and may work most effectively on water that has rough ice debris (e.g., in Alaska) (USEPA 2011e). Although oil recovery efforts must withstand the harsher climate conditions of the Arctic, a research program conducted by SINTEF in 2010 concluded that the mechanical recovery of oil spills is possible despite difficulties associated with maneuvering skimmers through ice (Sorstrom et al. 2010). In any environment, collection rates of 20% are considered exceptional in most cases (USEPA 2011e). In the case of the DWH event, skimmers only accounted for the removal of 3 or 4% of the released oil because of relatively low efficiency (USCG 2011).

The DWH event tested new, "enhanced" booms and skimmers, which may help expand the range and efficiency of recovery in open water and near shore. Advances have been made to create booms that can withstand rough sea conditions and more viscous oil, including in cold-water conditions offshore Norway (McKay 2011). As a result, the effectiveness of recovery both on open water and near shore can be expected to increase, especially given the attention of the USCG to this matter (USCG 2011).

Sorbent materials capture oil through absorption or adsorption and are often used to supplement booming and skimming. Lighter oil products (e.g., gasoline, diesel fuel, benzene) are absorbed more easily, while thicker oil responds better to adsorption (USEPA 2011f). While generally effective, the use of sorbents is less practical with extremely large spills or in windy conditions.

Chemical and Biological Methods. Surface dispersants (chemical-based) can be applied via boats, aircraft, or helicopters. A two- to three-day window following an event generally exists to use dispersants (BOEMRE 2010); therefore, pre-approval of dispersal as a contingency method and of specific dispersant use is essential (NRC 2006). Since the toxicity of dispersants is an important consideration (IPIECA 2008; NRC 2005), mechanical containment methods are the preferred initial response. Very large spills may require immediate application of dispersants.

The effectiveness of dispersants (compared to booming and skimming methods) is more dependent on sea conditions. Studies indicate that dispersants are most effective at salinities close to that of normal seawater (NRC 2005). In addition, dispersants work best in warmer water (USEPA 2011b).

Gelling agents react with oil to form rubber-like solids that can then be removed from the water via nets or skimmers. Gelling agents can be most effective for small to moderate spills in moderately rough seas. The volume of gelling agent required can be as much as three times that of the oil spill; therefore, for larger spills, it is impractical to use this method. Moderately rough seas provide increased mixing effect of the agents with the oil, resulting in greater solidification (USEPA 2011c).

The use of biological agents (i.e., bioremediation) for oil spill response is an emerging area of research. Bioremediation is the act of adding materials (e.g., microorganisms) to the environment to increase the rate of natural biodegradation. Currently, two technologies – fertilization and seeding – are being used in the United States for oil spill remediation (USEPA 2011a). Unlike the other methods covered in this section, bioremediation is a longer-term response effort.

***In Situ* Burning.** Burning is an effective method to remove much of the oil once it has reached the water's surface and reduces the need for storage of recovered oil. Weathering properties of the oil will affect whether or not surface burning is a viable option. For burning to work effectively, oil thickness must be at least 1 to 2 mm and water-in-oil emulsion must be 50% or less (NOAA 1997).

The weathering properties of oil in icy waters are also important for recovery efforts. Studies have shown that, in general, oil in icy waters weathers at a slower rate than in open waters. The slower weathering process of oil in the Arctic Ocean increases the opportunity of successful *in situ* burning, which efficiently reduces free floating oil and oil collected in booms (Sorstrom et al. 2010). *In situ* burning has been successful in cases where oil was trapped in ice (Nuka and Pearson 2010; S.L. Ross Environmental 2010).

A factor that could limit the application of *in situ* burning is the impact on human health due to gas and particulate release from oil burning. Studies estimate that 5 to 15% of the oil is converted to particulates (mostly soot) but that public exposure is not expected unless the smoke plume sinks to ground level. However, *in situ* burning raises general concerns over air quality impacts (NOAA 1997).

4.3.4.2.3 Fate.

Oil Type. Various oil types have varying characteristics, including pour point, viscosity, weight, and composition. In general, lighter oils tend to be less viscous and can be byproducts of crude oils such as diesel and gasoline. Lighter oils tend to be less toxic, although some from the GOM tend to have higher concentrations of toxic compounds (Etkin 2011). Heavier oils tend to

resist weathering and dispersant application, and then may persist in the water column for long periods of time (USGS 2011; USDOI 2010; Etkin 2011).

Evaporation. Evaporation occurs when oil comes in contact with air on the surface of the water. Evaporation rates are a function of numerous dynamics including oil viscosity, ambient temperature, sunlight exposure, and oil type (IPIECA 2008). In general, lighter oils such as diesel or gasoline will dissipate quickly or evaporate from the water, although evaporation is slower in colder temperatures. More viscous or heavy forms of oil will tend to persist longer and resist evaporation (USDOI 2011b). Compared to other oil-producing regions, a greater portion of oils extracted from the GOM tend to be lighter crude oils. Because such oils persist for a shorter period of time, they may cause less long-term damage and lower cleanup costs. The viscosity of Arctic oils varies, but due to colder surface temperatures and a generally cooler average climate, these oils are thought to evaporate more slowly, become trapped in ice, or become viscous and suspended in the water column (USGS 2011; USDOI 2011b).

Weathering. Weathering of oil in the sea results from a number of factors, including exposure to atmosphere, currents, biological organisms, and tidal patterns. In general, lighter oils such as diesel and gasoline weather quickly (Dickins 2011; IPIECA 2008; Etkin 2011). Higher ambient temperatures also accelerate weathering. The warm waters of the GOM are thought to help oil to dissipate, although this may not be the case for all oils, especially those generated in deepwater environments where ambient temperatures can be lower (USDOI 2010; IPIECA 2008; Etkin 2011). In cases where releases become suspended in the water column, long-term persistence may occur and potentially threaten marine life and economic activity tied to the marine environment.

The weathering characteristics of spilled oil influence the range of drift and spreading considered within spill trajectory assessments and dictate the effectiveness of chemical dispersants, *in situ* burning, or mechanical responses. Conditions in the Arctic may lead to longer term oil persistence. Denser, more viscous oils in colder temperatures weather at very slow rates, potentially persisting on rocks for years (USGS 2011). Cold water also increases the probability that oil from a spill will solidify in the water, persisting indefinitely and rendering cleanup more difficult. However, weathering in the Arctic will be contingent on the season and weather (Dickins 2011). If oil is exposed to more air and sunlight, evaporation and dispersion due to weathering may also accelerate. Due to the variability in seasons (and in particular the ice pack), it is important to consider the timing of the release in the Arctic to evaluate the potential for long-term damage to the surrounding marine and coastal environments.

Transport. The transport and behavior of oil and gas released into oceans varies greatly depending on the conditions of the area. The magnitude and spread of transport may depend on water depth, ocean currents, meteorological events, and geographic specific factors including the prevalence of ice. Fluids released into deep water, for instance, are subject to high hydrostatic pressure and low ambient temperature, increasing the oil's persistence and its potential to transport to coastlines. A shallow water release from a high-pressure formation with a high velocity may result in a turbulent mixing of the gas, oil, and water, with the mixture quickly transported to the surface by the expanding gas under decreasing hydrostatic pressure (PCCI 1999). Research as part of the DeepSpill Joint Industry Project indicates that above the point of

separation, gas bubbles and large oil droplets rise toward the surface while smaller, dispersed oil droplets may be entrained in deepwater currents at the terminus of the jet phase (Johansen et al. 2001; S.L. Ross Environmental 1997). Deepwater spills increase the potential for oil remaining trapped throughout the water column, and this increases the risk of oil transport to other regions and water bodies, although the oil is expected to be highly dispersed.

Meteorological events specific to the GOM may potentially transport spilled oil to shallow and coastal areas, increasing the risk of catastrophic consequences. Major meteorological events specific to the GOM are cold fronts and hurricanes. The wind force and magnitude of the storms in the area have the potential to expand the affected area of an oil spill. Typically occurring between June 1 and November 30, hurricanes also have the potential to destroy production facilities and precipitate releases. Data on platform spills also show that oil spills that result from hurricane damage in the GOM have been larger in volume, accounting for approximately 43% of large (>1,000 bbl) spills (Eschenbach and Harper 2011). During hurricane passages in the GOM, production is shut-in and facilities are evacuated. This reduces the probability of a very large release of oil from facilities.

Another major cause of physical transport that is specific to the GOM is the Loop Current, a warm ocean current that wraps around the western coast of Cuba and the panhandle of Florida. The current dominates upper ocean circulation in the eastern and central GOM, and transports approximately 30 million m^3 of water per second, with a variance of about 10%. Speeds may exceed 150 cm/s at the surface with velocities as high as 5 cm/s at 1,000-m (3,280-ft) depths. In both shallow and deep water, currents are dominated by cyclonic and anticyclonic eddies that vary in magnitude and frequency, which increases the uncertainty associated with effects on drilling operations (Donohue et al. 2006). The these characteristics exhibited by the GOM Loop Current impose uncertainties during drilling operations and in the event of an oil release. The vast amount of water transported throughout the GOM by the Loop Current highlights the potential for the current and its associated eddies to transport oil from a spill to the shelf and coastal areas, as well as water bodies outside of the GOM (USDOI 2007). Due to the proximity of the current to the shelf and sensitive coastal areas, there is concern regarding the rapid transport of oil in the event of a release. In many cases, the frontal boundary at the edge of the Loop Current may limit the extent of transport. In addition, highly persistent oil, especially in deepwater locations, may remain in the ocean for an indefinite period of time, increasing the potential for the Loop Current to carry oil to sensitive coastal areas (USDOI 2007).

In the Arctic Ocean, an important transport vehicle and barrier is ice. Offshore of the shore-fast zone, the motion of the ice will be expected to transport the oil that is associated with the ice. Field tests conducted by SINTEF Materials and Chemistry demonstrated that ice can help contain a spill, and act as a natural barrier to the spread of oil (Brandvik et al. 2010). Studies have shown that when ice coverage exceeds 10–20%, the higher ice coverage can trap spilled oil within newly formed ice (Sorstrom et al. 2010). Oil trapped in ice naturally prevents the spilled oil from affecting sensitive habitats and coastal areas, and prevents it from dispersing and spreading to other bodies of water. Physically removing ice that encases spilled oil is a potential solution in extreme cold temperatures. During the winter of 1998, 90% of the oil spilled in the St. Lawrence River was recovered by removing 1,369 tons of ice (recovering

10 tons of oil) (S.L. Ross Environmental 2010). Ocean currents in the Arctic are influenced by cyclonic and anticyclonic eddies pushing released oil in numerous directions.

4.3.4.3 Regional Risk Profiles

The previous discussion of risk factors has been used to develop generalized regional risk profiles for the areas under consideration for the Program. Figure 4.3.4-1 presents a conceptual framework for considering the sequence of events, circumstances, and factors that define a low-probability discharge event and contribute to the even lower potential for catastrophic consequences. The catastrophic discharge event sequence is divided into two principal phases: risk of occurrence and containment, and risk of fate and consequence. This framework conservatively assumes that a relief well is needed to kill a wild well following a loss of well control incident.

The top part of Figure 4.3.4-1 shows risk factors related to the occurrence of a well incident and the ability to contain and recover oil discharge at the well site up to the time needed to drill a relief well. The ability to mitigate these risks factors directly reduces the duration and volume of the oil spill and likelihood that the spill will be a catastrophic event. Reducing the risk of well control incidents, particularly for frontier exploration wells with the potential to release catastrophic discharge volumes, is of primary importance to avoid any risk of oil in the environment. As detailed in Section 4.3.4.3.4, BOEM implemented substantive regulatory improvements following the DWH event to identify and mitigate risk factors that contribute to well integrity and operational safety incidents.

If well barriers and intervention fails, containment and response at the well site becomes the next critical line of defense to minimize the volume of oil being released into the ocean. Mitigating the factors that constrain the ability to contain oil at the well site minimizes the degree and duration of exposure that may otherwise occur prior to a relief well being completed weeks to months later (or potentially longer in the Arctic depending on location and ice conditions). New seabed containment systems developed for the GOM have the potential to contain 60,000 bbl of oil per day. This system, if as effective as stated, could contain over 5,000,000 bbl of oil during a 90-day discharge period and significantly reduce the nature of exposure. Equivalent systems and/or capabilities are being developed to enhance containment in the Arctic. As detailed in the subsequent discussion in Section 4.3.4.3.4, BOEM has implemented substantive regulatory improvements following the DWH event to ensure industry has appropriate containment capability.

The lower part of Figure 4.3.4-1 shows factors that affect the fate and, in part, drive the consequences of oil released into and transported through the larger environment. These factors are not absolute risk factors, *per se*, because they do not operate in one direction, either increasing or decreasing risk, across all ecological and human use resources. Usually response actions taken to manage the fates or consequences of a spill involve considerations of tradeoffs among potential impacts. For example, dispersants may be applied to protect coastal habitats and resources from contact with a heavy, surface oil slick, but at the risk of exposing resources occupying the marine water column to the effects of dispersants and dispersed oil. Physical

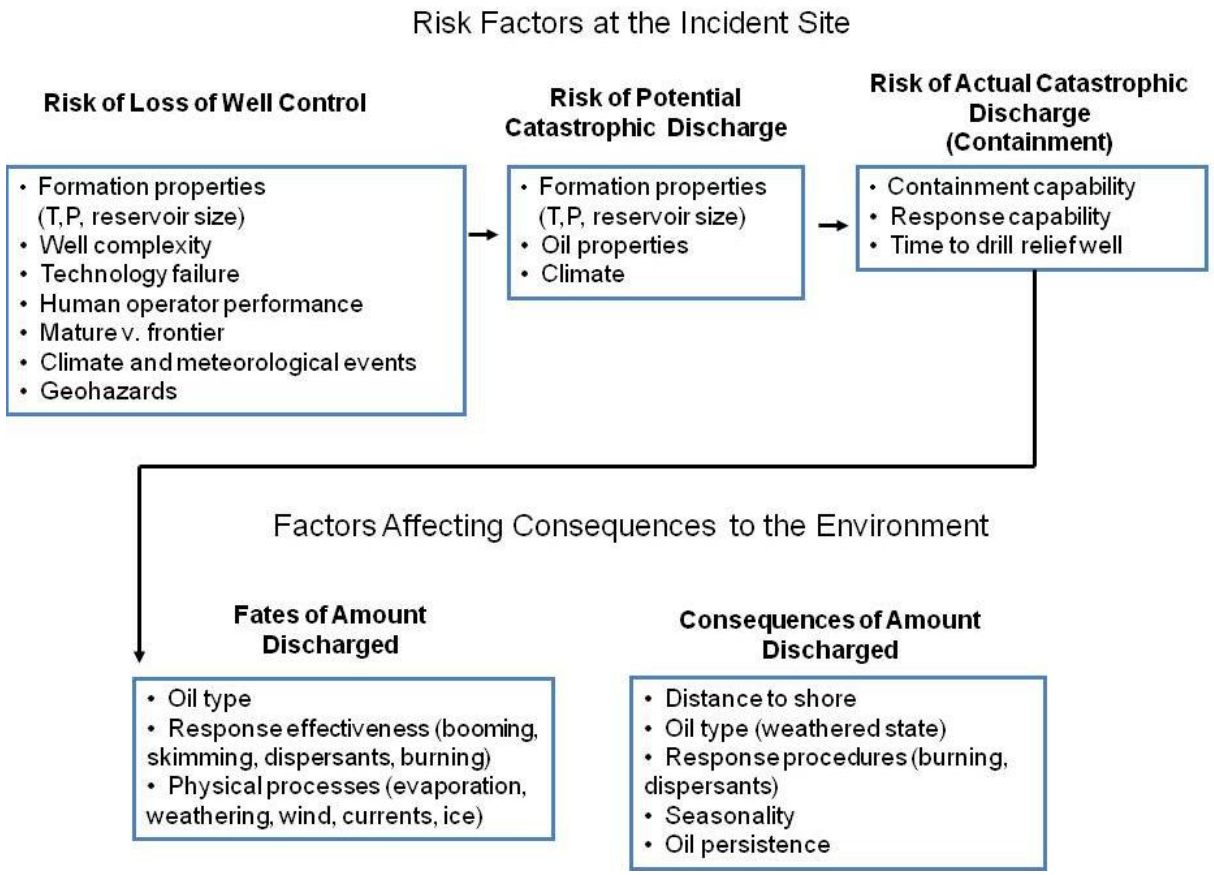

FIGURE 4.3.4-1 Factors Affecting a Catastrophic Discharge Event

processes such as the Loop Current in the GOM could transport dispersed oil across large areas within and outside the GOM, but whether or not this effect is considered a risk factor depends on whether the ecological or human use concerns focus on the effects of a widespread but dilute oil presence or on the effects of higher oil concentrations on critical resources within a more localized area. Even distance to shore does not operate unambiguously as a risk factor since drilling in deeper waters located farther offshore could increase drilling risk and potential impacts to pelagic marine resources, but at the same time reduce the risk of contact with coastal habitats and resources.

4.3.4.3.1 Catastrophic Discharge Event Scenarios. BOEM has prepared credible scenarios of catastrophic discharge for each planning area that are used in later effects analyses (Table 4.3.4-2). The scenarios do not account for potential discharge mitigating factors such as well barriers, well intervention, or effective containment and response. Instead, oil is conservatively assumed to flow from the well until the well is killed using a relief well. The volume presented is a potential volume released. When accounting for containment, subsurface and surface dispersion, evaporation, mechanical recovery, and *in situ* burning, the actual amount released is assumed to be less. The principal factors driving the potential release amount and duration are geologic, well design, and oil type properties (which determine maximum discharge

TABLE 4.3.4-2 Program Area Catastrophic Discharge Scenarios[a]

Program Area	Volume (Mbbl)	Duration (days)	Factors Affecting Duration
Gulf of Mexico	0.9–7.2	30–90	Water depth and drill depth determines timing of relief well
Arctic			
Chukchi Sea	1.4–2.2	40–75	Timing relative to ice free season and/or
Beaufort Sea	1.7–3.9	60–300	availability of rig to drill relief well
Cook Inlet	0.075–0.125	50–80	Availability of rig to drill relief well

[a] The GOM OCS region has estimated the discharge rate, volume of a spill, and the extent and duration for a catastrophic spill event for both shallow and deep water (in part) based on information gathered and estimates developed for the 1979 Ixtoc (1979) and the DWH (2010) oil spills. The Alaska OCS Region has estimated a very large oil spill scenario based on a reasonable, maximum flow rate for each OCS planning area, taking into consideration existing geologic conditions and information from well logs. The number of days until a hypothetical blowout and discharge from a well could be contained was also estimated. These are discharge volumes and do not account for decreases in volume from containment or response operations.

rate) and time frame required for drilling a relief well. The time frame required for drilling a relief well is principally governed by water and reservoir depth, timing of year, and availability of drilling rigs.

Such a scenario is a low-probability, accidental event. Bercha (2008) has reported the historical spill frequency for a spill greater than or equal to 150,000 bbl for GOM and North Sea well drilling as 3.42×10^{-4} per well. Accounting for Arctic specific variables, Bercha calculated a slightly smaller frequency of 3.94×10^{-4} per well for a spill greater than or equal to 150,000 bbl.

The principal risk factors that would affect drilling operations, containment, and response in Gulf of Mexico and Arctic program areas are summarized below. Cook Inlet is not considered further because of the relatively small size of the estimated catastrophic discharge event there compared to other program areas.

4.3.4.3.2 Gulf of Mexico Risk Profile. Drilling operations in deep water came under close scrutiny following the DWH event in April, 2010. A suspension on approving drilling plans and permits in deep water was imposed by the Secretary in July 2010. The Secretary lifted the suspension in October 2010 based on the implementation of new regulatory reforms to improve OCS drilling safety and a better understanding of the root causes of the DWH event. The safety of drilling in deepwater areas of the GOM remains an issue of concern, as witnessed by comments received during scoping. As stated earlier, water depth by itself does not impose risk; rather, it is the drilling technology and the relative inaccessibility of the well site on the seafloor that imposes risk from deepwater operations. Figure 4.3.4-2 highlights risk factors that

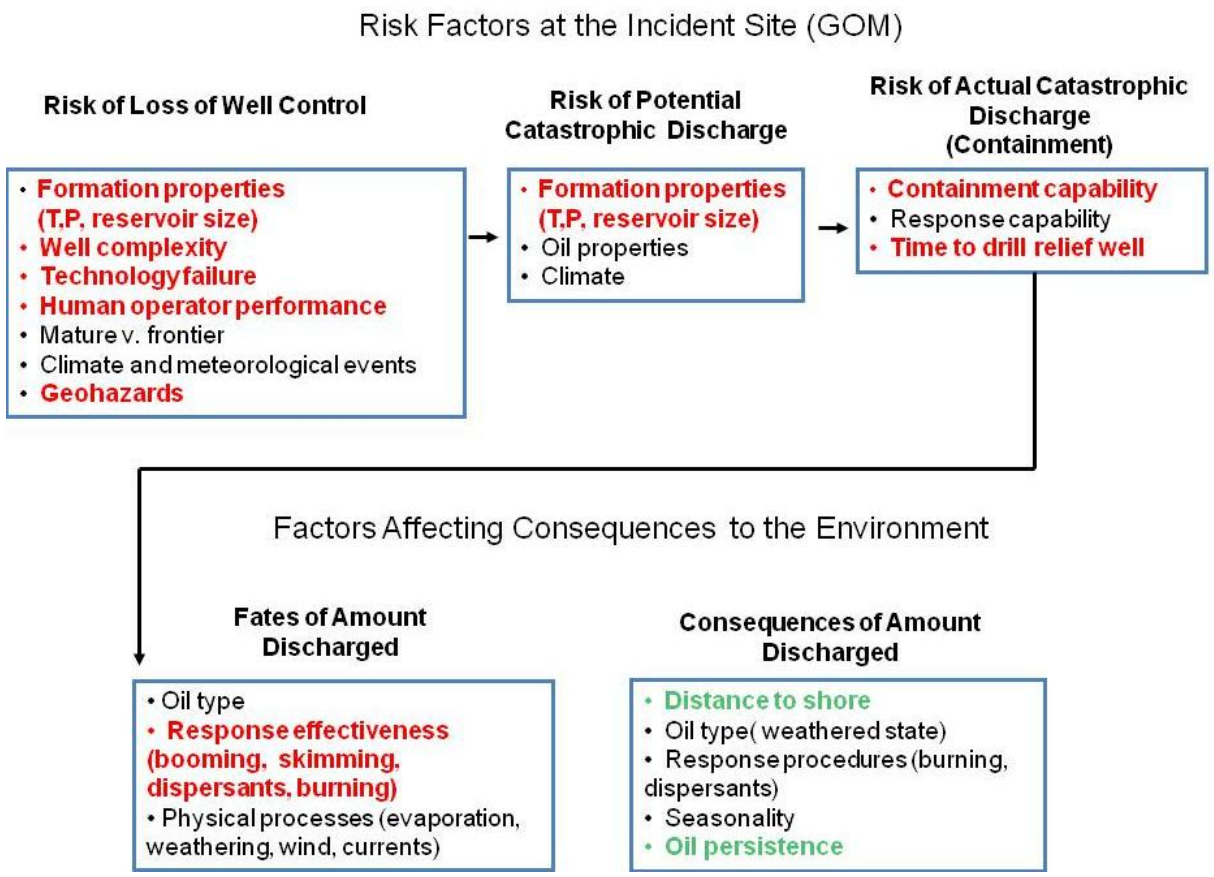

FIGURE 4.3.4-2 Principal Factors Affecting a Catastrophic Discharge Event in the Gulf of Mexico

apply to risks particular to deepwater wells (red text). The figure also highlights risk reduction factors associated with drilling in deep water compared to drilling in shallow water (green text).

Loss of Well Control.

Geologic Properties. Deepwater geologic formations tend to have higher temperatures and pressures than shallow water formations. In addition to varying oil properties, the differences in pressure regimes may contribute to relatively greater discharge rates. In addition, deepwater formations tend to hold larger volumes of hydrocarbons. The combination of the high temperature and pressure regime and comparatively large reservoir volumes create conditions that favor potentially catastrophic releases. When considering all OCS wells, the average vertical drill depth for boreholes in shallow water (less than 201 m [660 ft]) is approximately 2,864 m (9,400 ft), compared to 4,115 m (13,500 ft) in waters deeper than 201 m (660 ft). The drill depth required to reach target reservoirs requires more information about shallow and deep geologic hazards to avoid engineering and well integrity challenges. The time required to intervene using a relief well is also greater, because of the relative depth of the intervention zone. Because of the steeper gradient of the continental slope where deepwater wells are often drilled, compared to the gentler slope on the continental shelf, deepwater wells may be more subject to

mass movement and other seafloor instabilities that, if unanticipated, may increase the risk of a loss of well control incident. To avoid these complications, BOEM requires well shut-in prior to the passage of hurricanes, which are the most frequent cause of large-scale seafloor movements.

Well Complexity, Technology Failure and Human Performance. More complex wells and technology are often required in deepwater drilling to address the higher pressures and temperatures and greater drilling depths that will be encountered. This places greater demands on human and technology performance, especially where hydrostatic pressures are substantial greater due to an average 762-m (2,500-ft) greater water depth. Furthermore, the inaccessibility of the seafloor to humans at deepwater well sites means that the subsea BOP systems used at deepwater drill sites are inaccessible to human maintenance, inspection, and intervention in the event they are activated as a result of a loss of well control event. Deepwater drilling sites use ROVs and other indirect methods of intervening in a loss of well control incident at the seafloor.

Containment and Response. The drilling of a relief well in deep water will likely take longer than in shallow water because of the greater water depth, greater drill depth, and more complex drilling conditions the relief well would encounter. Table 4.3.4-2 estimates that up to 90 days may be needed after the loss of well control event to drill the relief well and kill the wild well. During that time, the success of containment and response at the well site would be a critical factor governing whether sufficient oil is released into the environment to have catastrophic consequences. Containment and response is expected to be more challenging in areas with deeper water because of the greater distances from land support bases and staging areas. Progress has been made in the GOM to develop effective containment and response technology for deepwater conditions, including deep dispersant application.

Fate and Consequence. Should containment and response at the well site fail to prevent discharge of oil into the ocean environment, response and oil recovery would continue as the oil discharge spreads. Response operations could be more challenging to support in deeper water because of the greater distances from shore bases, as well as the fact that the area of surfaced oil would continue to increase as deepwater currents exported oil to the shelf.

Because deepwater wells are located at greater distances offshore than shallow wells, high concentrations of oil are less likely to contact important ecological and human use coastal resources. In addition, the risk of persistence of the oil in the environment would likely be less in deepwater events because oil released there would be less likely to contact coastal wetland and estuarine areas where it could become incorporated into wetland soils and persist for long periods of time.

Summary. The principal risk that applies to deepwater drilling in the GOM occurs as a result of drilling and containment/response risks associated with the use of drilling technologies at these depths. As described below, BOEM has been aggressively pursuing regulatory changes to address and mitigate risks associated with these deepwater drilling and containment issues. It is not necessarily true that a deepwater, large volume spill would have more environmental consequences than a smaller spill occurring in shallow water. Deepwater spills may, in part, impose less risk on highly valued coastal areas because of their distance offshore, which allows

for more natural weathering and dispersion. In comparison, shallow shelf spills may more rapidly contact low-energy estuarine and wetland areas.

4.3.4.3.3 Arctic Risk Profile. An ongoing concern in the Arctic is the environmental effects of a large oil spill on sensitive marine and coastal habitats that occur there within a land-sea-ice biome that supports a traditional subsistence life style for Alaska native populations and provides important habitats for migratory and local faunal populations. The ability to respond to and contain a very large discharge event under the extreme climatic conditions and seasonal presence of ice is of particular concern. Figure 4.3.4-3 highlights factors that apply to risks particular to operations in the Arctic related to extreme cold and the presence of ice.

Loss of Well Control. While some formation properties of the Arctic OCS are expected to have pressures, temperatures, and volumes sufficient to produce a discharge that could result in catastrophic consequences (Table 4.3.4-2), drilling risks associated with these formation characteristics are not directly related to issues of extreme cold and presence of ice. Instead, the fact that the Arctic OCS is largely a frontier geologic province contributes risk to Arctic drilling operations (USGS 2011).

Human error while working under extreme weather conditions on the Arctic OCS could increase the risk of loss of well control in certain circumstances where established procedures are not followed. However, when accounting for other Arctic specific variables, the incident rate of loss of well control is expected to be lower than for exploration and development operations in the GOM (Bercha et al. 2008).

To address some of the risk inherent in Arctic operations, the BOEM regulations include specific requirements for conducting operations in the Arctic, such as locating the BOP in a well cellar (a hole constructed in the sea bed) to position the top of the BOP below the maximum potential ice gouge depth, using special cements in areas where permafrost is present, enclosing or protecting equipment to assure it will function under subfreezing conditions, and developing critical operations and curtailment procedures which detail the criteria and process through which the drilling program would be stopped, the well shut in and secured and the drilling unit moved off location before environmental conditions (such as ice) exceed the operating limits of the drilling vessel.

Containment and Response. Much of risk from a catastrophic event that is particular to the extreme climate of the Arctic is associated with containment and response issues at the well site. The time needed to drill a relief well varies from 40 to 300 days depending on the timing of the event relative to the ice free season, since the well site may become inaccessible when solid or broken ice is present. During that time, the ability to mount effective containment and response efforts under broken or solid ice conditions is a critical factor.

Fate and Consequence. Response away from the well site could also be hindered and/or aided by broken and solid ice. In addition, some options available to manage fates of spills have not been previously used in larger-scale operations the Arctic to fully evaluate their

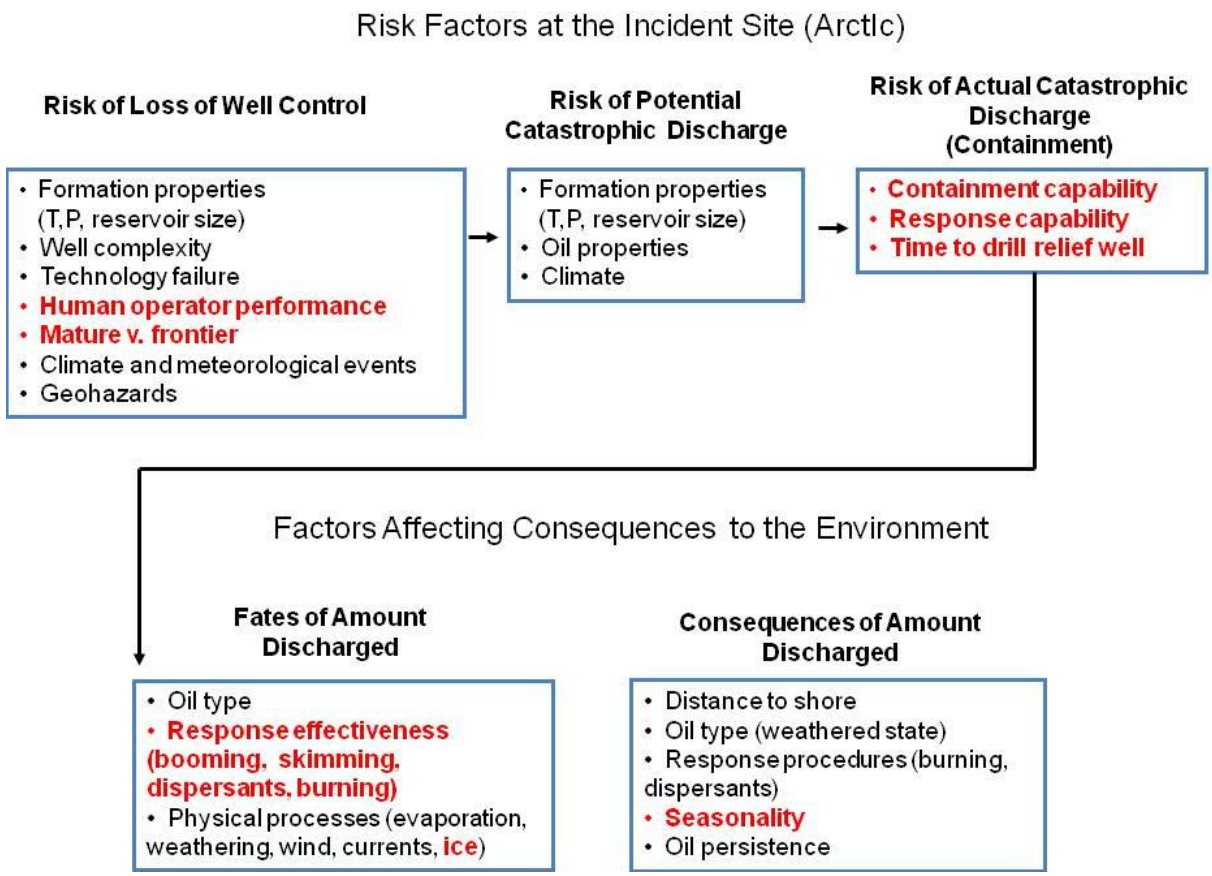

FIGURE 4.3.4-3 Principal Factors Affecting a Catastrophic Discharge Event in the Arctic

effectiveness, such as burning and dispersant use, although state-of-the art research on these response techniques suggest they could decrease the volume of oil in the water (SINTEF 2010).

4.3.4.3.4 Recent Regulatory Reforms Implemented to Reduce Risk. In the event of a spill, there is no single method of containment and response that would be 100% effective. While recent enhancements in intervention, containment, and response should reduce spill volume and mitigate certain environmental effects, the principal corrective action is still a relief well, and drilling a relief well to kill a wild well takes time. This highlights the fundamental importance of prevention. In response to the DWH event and in recognition that advances in prevention were critical, BOEM overhauled the offshore regulatory process reforming, through both prescriptive and performance-based regulation and guidance, as well as OCS safety and environmental protection requirements. The reforms strengthen the requirements for all aspects of OCS operations from well design to workplace safety to corporate accountability. The other logical capability needing improvement is spill response. New measures and reforms adopted by BOEM to strengthen safety, spill prevention, and spill response include the following:

- Drilling Safety Rule, Interim Final Rule to Enhance Safety Measures for Energy Development on the Outer Continental Shelf (Drilling Safety Rule);

- Workplace Safety Rule, Safety and Environmental Management Systems (SEMS Rule):

- NTL 2010-N06, Information Requirements for Exploration Plans, Development and Operations Coordination Documents on the OCS (Plans NTL);

- NTL 2010-N10, Statement of Compliance with Applicable Regulations and Evaluation of Information Demonstrating Adequate Spill Response and Well Containment Resources (Certification NTL); and

- Enhanced inspection and enforcement procedures, including strengthened training program.

Drilling Safety Rule. The prescriptive Drilling Safety Rule addresses well bore integrity and well control equipment and procedures. The rule effectively implements many of the recommendations made in the May 27, 2010, USDOI report Increased Safety Measures for Energy Development on the Outer Continental Shelf (USDOI 2010). BOEMRE amended drilling regulations related to subsea and surface blowout preventers, well casing and cementing, secondary intervention, unplanned disconnects, recordkeeping, well completion, and well plugging.

Well integrity provides the first line of defense against a blowout by preventing a loss of well control. It includes the appropriate use of drilling fluids and the well bore casing and cementing program. These are used to balance pressure in the borehole against the fluid pressure of the formation, preventing an uncontrolled influx of fluid into the wellbore. Provisions in the rule addressing well bore integrity include the following:

- Making mandatory American Petroleum Institute's (API) standard, RP 65 – Part 2, Isolating Potential Flow Zones During Well Construction (an industry standard program);

- Requiring submittal of certification by a professional engineer that the casing and cementing program is appropriate for the purposes for which it is intended under expected wellbore pressure;

- Requiring two independent test barriers across each flow path during well completion activities (certified by a professional engineer);

- Ensuring proper installation, sealing, and locking of the casing or liner;

- Requiring BOEM approval before replacing a heavier drilling fluid with a lighter fluid; and

- Requiring enhanced deepwater well control training for rig personnel.

Well control equipment is used to bring a well back under control in the event of a loss of well control. Well control equipment includes the BOP and control systems that activate the BOP, either through a control panel on the drilling rig or through ROVs that directly interface with the BOP to activate appropriate rams. Provisions in the rule that focus on the enhancement of well control equipment include the following:

- Submittal of documentation and schematics for all control systems;
- Requirements for independent third party verification that the blind-shear rams are capable of cutting any drill pipe in the hole under maximum anticipated surface pressure;
- Requirement for a subsea BOP stack equipped with ROV intervention capability (at a minimum the ROV must be capable of closing one set of pipe rams, closing one set of blind-shear rams, and unlatching the lower marine riser package);
- Requirement for maintaining a ROV and having a trained ROV crew on each floating drilling rig on a continuous basis;
- Requirement for auto shear and deadman systems for dynamically positioned rigs;
- Establishment of minimum requirements for personnel authorized to operate critical BOP equipment;
- Requirement for documentation of subsea BOP inspections and maintenance according to API RP 53, *Recommended Practices for Blowout Prevention Equipment Systems for Drilling Wells*;
- Require testing of all ROV intervention functions on subsea BOP stack during stump test and testing at least one set of rams in initial seafloor test;
- Require function testing auto shear and deadman systems on the subsea BOP stack during the stump test and testing the deadman system during the initial test on the seafloor; and
- Require pressure testing if any shear rams are used in an emergency.

A section-by-section summary of major regulatory changes is provided below.

Subsea ROV and Deadman Function Testing — Drilling. Previous regulations at 30 CFR 250.449(b) required a stump test of the subsea BOP system. In a stump test, the subsea BOP system is placed on a simulated wellhead (the stump) on the rig floor. The BOP system is tested on the stump to ensure that the BOP is functioning properly. The new regulatory section at 30 CFR 250.449(j) requires that all ROV intervention functions on the subsea BOP stack must

be tested during the stump test and one set of rams must be tested by an ROV on the seafloor. Autoshear and deadman control systems activate during an accidental disconnect or loss of power, respectively. The new regulatory section at 30 CFR 250.449(k) requires that the autoshear and deadman systems be function-tested during the stump test, and the deadman system tested during the initial test on the seafloor. The initial test on the seafloor is performed as soon as the BOP is attached to the subsea wellhead. These new requirements will confirm that a well will be secured in an emergency situation and prevent a possible loss of well control. The ROV test requirement will ensure that the dedicated ROV has the capacity to close the BOP functions on the seafloor. The deadman-switch test on the seafloor verifies that the wellbore closes automatically if both hydraulic pressure and electrical communication are lost with the drilling rig. These regulatory changes will not affect shallow wells or facilities since they do not use subsea BOPs or ROVs.

Subsea ROV and Deadman Function Testing—Workover/Completions. Previous regulations did not require subsea ROV function testing of the BOP during workover or well completion operations. The new regulatory sections 30 CFR 250.516(d)(8) and 250.616(h)(1) extend the requirements added to deepwater drilling operations (discussed in the previous section) to well completion operations and workover operations using a subsea BOP stack.

Negative Pressure Tests. Previous regulation at 30 CFR 250.423 required a positive pressure test for each string of casing, except for the drive or structural casing string. This test confirms that fluid from the casing string is not flowing into the formation. The new regulatory section at 30 CFR 250.423(c) requires that a negative pressure test be conducted for all intermediate and production casing strings. This test will reveal whether gas or fluid from outside the casing is flowing into the well and ensures that the casing and cement provide an effective seal. Maintenance of pressure under both tests ensures proper casing installation and the integrity of the casing and cement.

Installation of Dual Mechanical Barriers. Previous regulations did not require the installation of dual mechanical barriers. The new regulatory section at 30 CFR 250.420(b)(3) requires the operator install dual mechanical barriers in addition to cement barriers for the final casing string. These barriers prevent hydrocarbon flow in the event of cement failure at the bottom of the well. The operator must document the installation of the dual mechanical barriers and submit this documentation to BOEM within 30 days after installation. These new requirements will ensure that the best casing and cementing design will be used for a specific well.

Professional Engineer Certification for Well Design. Previous regulations at 30 CFR 250.420(a) specified well casing and cementing requirements, but did not require verification by a registered professional engineer. The new regulatory section at 30 CFR 250.420(a)(6) requires that well casing and cementing specifications must be certified by a registered professional engineer. The registered professional engineer will verify that the well casing and cementing design is appropriate for the purpose for which it is intended under expected wellbore conditions.

Emergency Cost of Activated Shear Rams. Previous regulations did not address BOP inspection following use of the blind-shear ram or casing shear ram. The new regulatory section

at 30 CFR 250.451(i) requires that, if a blind-shear ram or casing shear ram is activated in a well control situation where the pipe is sheared, the BOP stack must be retrieved, fully inspected, and tested. This provision will ensure the integrity of the BOP and that the BOP will still function and hold pressure after the event.

Third Party Shearing Verification. Regulation 30 CFR 250.416(e) requires information verifying that BOP blind-shear rams are capable of cutting through any drill pipe in the hole under maximum anticipated conditions. This regulation has been modified to require the BOP verification be conducted by an independent third party. The independent third party provides an objective assessment that the blind-shear rams can shear any drill pipe in the hole if the shear rams are functioning properly.

Workplace Safety Rule. The BOEMRE promulgated the performance-based SEMS rule on October 15, 2010, requiring full implementation for all OCS facilities and operators no later than November 15, 2011. The SEMS Rule establishes a holistic, performance-based management tool in which offshore operators are required to establish and implement programs and systems to identify potential safety and environmental hazards when they drill, clear protocols for addressing those hazards, and strong procedures and risk-reduction strategies for all phases of activity, from well design and construction to operation, maintenance, and decommissioning. It also requires operators to have a comprehensive safety and environmental impact program designed to reduce human and organizational errors. SEMS applies to all OCS oil and gas operations and facilities under BOEM and BSEE jurisdiction including drilling, production, construction, well workover, well completion, well servicing, and DOI pipeline activities. SEMS also applies to all OCS oil and gas operations on new and existing facilities under BOEM and BSEE jurisdiction including design, construction, start-up, operation, inspection, and maintenance. The performance-based SEMS rule helps to define clear roles and responsibilities, in which BOEM define the performance goals while the operator is responsible to ensure that these goals are met. Operators do not rely on the authorities to ensure safety. Empowering industry to develop the framework specific to improve safety and environmental performance of facilities and operations and holding them responsible to that greater standard should eliminate the most frequent causes of historic incidents that have occurred during OCS activities. Training and auditing are an integral part of the SEMS rule to ensure contractors and subcontractors have robust policies and procedures in place.

The SEMS Rule is based on API RP 75, which was previously a voluntary program to identify, address, and manage safety hazards and environmental impacts in oil and gas operations. The 13 elements of API RP 75 that 30 CFR 250 Subpart S now make mandatory include:

- Defining the general provisions for implementation, planning and management review, and approval of the SEMS program;

- Identifying safety and environmental information needed for any facility such as design data, facility process such as flow diagrams, and mechanical components such as piping and instrument diagrams;

- Requiring a facility-level hazard risk assessment;
- Addressing any facility or operational changes including management changes, shift changes, contractor changes;
- Evaluating operations and written procedures;
- Specifying safe work practices, manuals, standards, and rules of conduct;
- Training, safe work practices, and technical training, including contractors;
- Defining preventive maintenance programs and quality control requirements
- Requiring a pre-startup review of all systems;
- Responding to and controlling emergencies, evacuation planning, and oil-spill
- Contingency plans in place and validated by drills;
- Investigating incidents, procedures, corrective action, and follow-up;
- Requiring audits every 4 yr, to an initial 2-yr reevaluation and then subsequent 3-yr audit intervals; and
- Specifying records and documentation that describes all elements of the SEMS program.

Implementation of SEMS requires periodic lessee or independent third party comprehensive audits of the 13 elements defined in API RP 75 and included above. BSEE may participate in lessee or independent third party audits and may also conduct independent audits. BSEE-conducted audits may be announced or unannounced. Any deficiencies found in SEMS audits must be addressed in a corrective action plan (CAP) and must be submitted to BSEE within 30 days of submittal of the audit report. If BSEE determines that an operator's SEMS program is not in compliance, BSEE may issue an incidence of non-compliance (INC), assess civil penalties, or initiate probationary or disqualification procedures from serving as an OCS operator. The required SEMS plan and audits are designed to improve, enhance, communicate and document the identification and mitigation of safety and environmental hazards for offshore facilities and activities resulting in safer and environmentally sound working conditions through teamwork, training and communication among all parties for all activities on the OCS.

One of the most important elements that fosters improved industry-wide risk management is the facility-level hazard analysis. The purpose of the analysis is to identify, evaluate, and reduce the likelihood and/or minimize the consequences of uncontrolled releases of oil and gas and other safety or environmental incidents. API RP 14 C, *Recommended Practice for Analysis, Design, Installation, and Testing of Basic Surface Safety Systems for Offshore Production Platforms* and API RP 14J, *Recommended Practice for Design and Hazards Analysis*

for Offshore Production Facilities, identify accepted practices. In addition, this element requires a job hazard analysis (operations/task level) be performed to identify and evaluate hazards of a job/task for the purpose of hazards control or elimination.

Information Requirements for Exploration Plans, Development and Production Plans, and Development Operations Coordination Documents on the OCS (Plans NTL). The Plans NTL, effective June 18, 2010, set new standards regarding the content of information needed in exploration and development plan submittals to describe a blowout and worse-case discharge scenario. This NTL explains the procedures for the lessee or operator to submit supplemental information for new or previously submitted Exploration Plans (EP) or Development and Production Plans (DPP). The required supplemental information includes the following: (1) a description of the blowout scenario as required by 30 CFR 250.213(g) and 250.243(h); (2) a description of their assumptions and calculations used in determining the volume of the worst-case discharge required by 30 CFR 250.219(a)(2)(iv) or 30 CFR 250.250(a)(2)(iv) and (3) a description of the measures proposed that would enhance the ability to prevent a blowout, to reduce the likelihood of a blowout, and to conduct effective and early intervention in the event of a blowout, including the arrangements for drilling relief wells and any other measures proposed. The early intervention methods of the third requirement could include the surface and subsea containment resources that BOEMRE announced in NTL2010-N10 (Certification NTL).

Statement of Compliance with Applicable Regulations and Evaluation of Information Demonstrating Adequate Spill Response and Well Containment Resources (Certification NTL). The Certification NTL, effective on November 8, 2010, requires lessees and operators using subsea or surface BOPs on floating facilities (i.e., deepwater) to provide a statement verifying compliance with new well containment and oil spill response requirements prior to being granted a Permit to Drill/Modify (APD/APM). Specifically, the statement, signed by an authorized company official, indicates that authorized activities will be in compliance with all applicable regulations, including the requirements of the Drilling Safety Rule.

The NTL also informs lessees that BOEM will be evaluating whether or not each operator has submitted adequate information demonstrating that it has access to and can deploy surface and subsea containment resources to promptly respond to a blowout or other loss of well control. Although the NTL does not provide that operators submit revised OSRPs that include this containment information at this time, operators were notified of BOEM's intention to evaluate the adequacy of each operator to comply in the operator's current OSRP; therefore, there is an incentive for voluntary compliance.

The benefits of the new requirements include the following:

- Improving the response time for offshore vessels to remove damaged equipment and install a capping stack;

- Reducing the amount of time a well flows into the sea compared with previous well blowouts;

- Providing more robust well designs relative to expected pressures and fluids in the well to fully contain the well after installation of the capping stack;

- Determining the well's potential to broach to the seafloor if the well design fails under the shut-in pressure with installed capping stack, and

- Determining the surface vessels configuration and containment capacities if the well has to flow to the surface for processing and capture.

In the event of a well blowout, OCS operators must demonstrate the capability to remove damaged well equipment and install a capping stack (with a pressure rating higher than the calculated mud line shut-in pressure) to stop the uncontrolled flow of oil from the well. If the well design fails under the shut-in pressure, the operator must demonstrate the capability to flow and process the oil and gas from the well into surface containment vessels. Although not explicitly stated in the Certification NTL notice, BOEM requires operators to demonstrate that the well design is adequate to contain an uncontrolled flow. BOEM uses a Level 1 Well Containment Screening Tool (WCST) for all initial reviews prior to APD approval. The Level 1 WCST is useful for wells that can be fully shut-in without causing underground flow, using very conservative assumptions and simple calculations (no requirement for computer simulations). However, not all wells can pass a Level 1 screening successfully due to high pressure and/or light formation fluids expected in the well. The Level 2 WCST Analysis uses field/offset data and more advanced calculations to demonstrate equipment and well integrity. The Level 2 WCST Analysis also identifies failure points and possible loss zones which must be addressed in a consequence analysis. The WCST developed by BOEM and offshore operators working together on the design of the containment approval process under oil spill response has resulted in more robust well designs that reduce the risk of prolonged well flow into the sea and increase the chance of successfully capping and stopping the flow of oil in less than 15 to 30 days.

On December 13, 2010, BOEMRE issued additional guidance to encourage operators to voluntarily include additional subsea containment information in their OSRPs. The guidance indicates that BOEM will review OSRPs, in support of plan submittals, for the following specific information relating to subsea containment (in addition to that listed in the Certification NTL):

- Source abatement through direct intervention;

- Relief wells;

- Debris removal; and

- If a capping stack is the single containment option offered, the operator must provide

- the reasons that the well design is sufficient to allow shut-in without broach to the

- seafloor.

Enhanced Inspection and Enforcement Procedures, Including Strengthened Training Program. As of October 1, 2011 the new BSEE is responsible for enforcement of safety and environmental regulations. BSEE undertakes both annual scheduled inspections and periodic unscheduled (unannounced) inspections of oil and gas operations on the OCS. The inspections are to assure compliance with all regulatory constraints that allowed commencement of the operation. The annual inspection examines all safety equipment designed to prevent blowouts, fires, spills, or other major accidents. These annual inspections involve the inspection for installation and performance of all facilities' safety-system components. The primary objective of an initial inspection is to assure proper installation and functionality of their safety and pollution prevention equipment. After operations begin, additional announced and unannounced inspections are conducted. Unannounced inspections are conducted to foster a climate of safe operations, to maintain a BSEE presence, and to focus on operators with a poor performance record. These inspections are also conducted after a critical safety feature has previously been found defective. Poor performance generally means that more frequent, unannounced inspections may be conducted on a violator's operation. The inspectors follow the guidelines as established by the regulations, API RP 14C, and the specific BOEM-approved plan. The BSEE inspectors perform these inspections using a national checklist called the PINC list. This list is a compilation of yes/no questions derived from all regulated safety and environmental requirements.

BSEE administers an active civil penalties program (30 CFR 250 Subpart N). A civil penalty in the form of substantial monetary fines may be issued against any operator that commits a violation that may constitute a threat of serious, irreparable, or immediate harm or damage to life, property, or the environment. BSEE may make recommendations for criminal penalties if a willful violation occurs. In addition, the regulation at 30 CFR 250.173(a) authorizes suspension of any operation if the lessee has failed to comply with a provision of any applicable law, regulation, or order or provision of a lease or permit. Furthermore, the Secretary may invoke his authority under 30 CFR 250.185(c) to cancel a nonproductive lease with no compensation. Exploration and development activities may be canceled under 30 CFR 250.182 and 250.183.

Predecessor bureaus to BSEE established a robust training program for inspectors to ensure that personnel involved in installing, inspecting, testing, and maintaining safety devices are qualified. As a preventive measure, all offshore personnel must be trained to operate oil-spill cleanup equipment, or the lessee must retain a trained contractor(s) to operate the equipment for them. BSEE offers numerous technical seminars to ensure that personnel are capable of performing their duties and are incorporating the most up-to-date safety procedures and technology in the petroleum industry. In 1994, the Office of Safety Management created this Agency's Offshore Training Institute to develop and implement an inspector training program. The Institute introduced state-of-the-art multimedia training to the inspector work force and has produced a series of interactive computer training modules. As of June 2011, BOEMRE established the National Offshore Training Center, thereby developing the agency's first formal training curriculum, which has been piloted with new inspectors. Twenty-four additional courses will be developed covering specific areas of offshore inspections.

Following the DWH oil spill, BSEE now requires multiple-person inspection teams for offshore oil and gas inspections. This internal process will improve oversight and help ensure that offshore operations proceed safely and responsibly. The new process will allow teams to inspect multiple operations simultaneously and thoroughly, and enhance the quality of inspections on larger facilities. In addition, BSEE engineers and inspectors now fly offshore to witness required testing of all ROV intervention functions on the subsea BOP stack during the stump test (on the rig floor at surface) and testing at least one set of rams during the initial test on the seafloor, and required function testing of autoshear and deadman systems on the subsea BOP stack during the stump test and testing the deadman system during the initial test on the seafloor. These reviews and inspections of the BOP systems and maintenance provide additional oversight by BSEE to reduce the risk of an uncontrolled blowout by ensuring that BOP systems are maintained and functional in the event of a well control event.

Relevance to Risk Reduction in Drilling Operations (including deep water). In the aftermath of the DWH Event, President Obama directed the Secretary of the Interior to identify new precautions, technologies, and procedures needed to improve the safety of oil and gas development on the OCS. At the same time, the Secretary directed BOEMRE to exercise its authority under the OCSLA to suspend certain drilling activities so that the bureau could (1) ensure that drilling operations similar to those that lead to the DWH oil spill could operate in a safe manner when drilling resumed, (2) ensure extensive spill response resources directed toward the spill would be available for other spill events, and (3) provide adequate time to obtain input enhance intervention and containment capability and promulgate regulations that address issues described in the Safety Measures Report (USDOI 2010).

BOEMRE collected a large amount of information through public hearings and other meetings held specifically on the DWH oil spill and through public comments on rulemaking efforts. The information collection, review, and analysis efforts resulted in new regulations, planned Notices to Lessees and Operators (NTLs), and BOEM/BSEE procedures that address drilling safety, oil-spill response, and enhanced inspection procedures. New exploration plans, applications for permits to drill, and OSRP plans are be subject to higher engineering and environmental review standards. In addition, the oil and gas industry has cooperatively formed Joint Industry Task Forces in subsea well control and containment and oil spill preparedness and response. While Joint Industry Task Force recommendations will not have the force of regulation, the recommendations may provide the basis for enhanced industry standards or future rulemaking processes. Similarly, the Secretary of the Interior established the Ocean Energy Safety Advisory Committee to facilitate the development of new regulations, collaborative research and development, advanced training, and implementation of best practices in drilling safety, well intervention and containment, and oil spill response.

The DWH event demonstrated that advances in drilling, safety, and spill response did not keep pace with increasingly complex operations, and evidenced the need to strengthen oversight of offshore drilling operations by raising the standards for drilling and workplace safety, spill containment, and spill response. The measures described above create a more robust regulatory system that strikes the right balance to ensure that energy development is conducted safely and in an environmentally responsible manner, while also being more efficient, transparent and responsive.

4.4 ENVIRONMENTAL IMPACTS OF ALTERNATIVE 1 – PROPOSED ACTION

4.4.1 Exploration and Development Scenario

4.4.1.1 Gulf of Mexico

Oil and gas leasing and development have been occurring in the GOM for over 50 years. There are a total of 29,097 lease blocks (each approximately 23 km^2 [3 mi × 3 mi]) and a total of 3,280 active platforms in the Western, Central, and Eastern GOM OCS Planning Areas. Predictable patterns of activity have become established for the planning areas, and these were used to estimate future activity within the GOM OCS Region Planning Areas that could occur under this scenario (Table 4.4.1-1). This scenario of future development and activity was generated using best professional judgment for the purpose of analysis only and does not constitute official forecasts or policy recommendations.

The scenario information in Table 4.4.1-1 is initially assumed to have the potential to occur anywhere within the areas of the GOM Planning Areas included in the proposed action (Figure 4.4.1-1).

In the analysis of potential environmental impacts associated with the leasing program, additional assumptions are used to identify potential oil and gas development activity levels to more specific marine and coastal areas under consideration in a particular analysis. The GOM OCS may be divided into continental shelf and slope regions, and this distinction is important to both the occurrence of oil and gas within the GOM hydrocarbon basin and to ecosystem characteristics and processes within the GOM Large Marine Ecosystem. Assumed levels of oil and gas infrastructure and production that would occur on the continental slope and shelf are shown in Table 4.4.1-2. This information suggests that while the amounts of well drilling and gas production will be approximately the same on the shelf as on slope (51% versus 49%, respectively), most new platforms will be installed in shallow water (in depths <200 m [<660 ft]) on the continental shelf. In contrast, most oil production (93%) will occur in deeper water (at depths >200 m [>660 ft]) on the continental slope.

This assumed difference by depth of infrastructure development and oil and gas production suggests similar differences in the resources that could be affected by normal exploration and development (E&D) activities on the OCS. For example, 87% of all new platform development is assumed to occur in waters of the inner continental shelf at depths of 60 m (about 200 ft) or less (Table 4.4.1-2). Thus, resources occurring in these shallower areas may be expected to be more likely to encounter, and be affected by, normal well development and operation than would resources restricted to deeper areas of the OCS.

TABLE 4.4.1-1 Proposed Action (Alternative 1) – Exploration and Development Scenario for the GOM

Scenario Element	Gulf of Mexico
Number of sales	12
Years of activity	40–50
Potentially available oil (Bbbl)[a]	2.7–5.4
Potentially available natural gas (tcf)	12–24
Platforms	200–450
FPSOs[b]	0–2
No. of exploration and delineation wells	1,000–2,100
No. of development and production wells	1,300–2,600
Miles of new pipeline	2,400–7,500
Vessel trips/week	300–600
Helicopter trips/week	2,000–5,500
New pipeline landfalls	0–<12
New pipe yards	4–6
New natural gas processing facilities	0–12
Platforms removed with explosives	150–275
Drill Muds/Well (tons)	
Exploration and delineation wells	1,000
Development and production wells	1,000
Drill Cuttings/Well (tons)	
Exploration and delineation wells	1,200
Development and production wells	1,200
Produced Water/Well/yr (tbbl)[c]	
Oil well	130 (highly variable)
Natural gas well	35 (highly variable)
Bottom Area Disturbed (ha)[d]	
Platforms	150–2,500
Pipeline	2,000–11,500

[a] Bbbl = billion barrels.

[b] Floating production, storage, and offloading systems.

[c] Based on 1.04 bbl produced water/bbl of oil, and 86 bbl produced water/1 million cf gas (Clark and Veil 2009); tbbl = thousand barrels.

[d] Assumes 0.67 ha (1.6 ac) per platform and 0.8–1.6 ha (2.0–4.0 ac) per mile of pipeline.

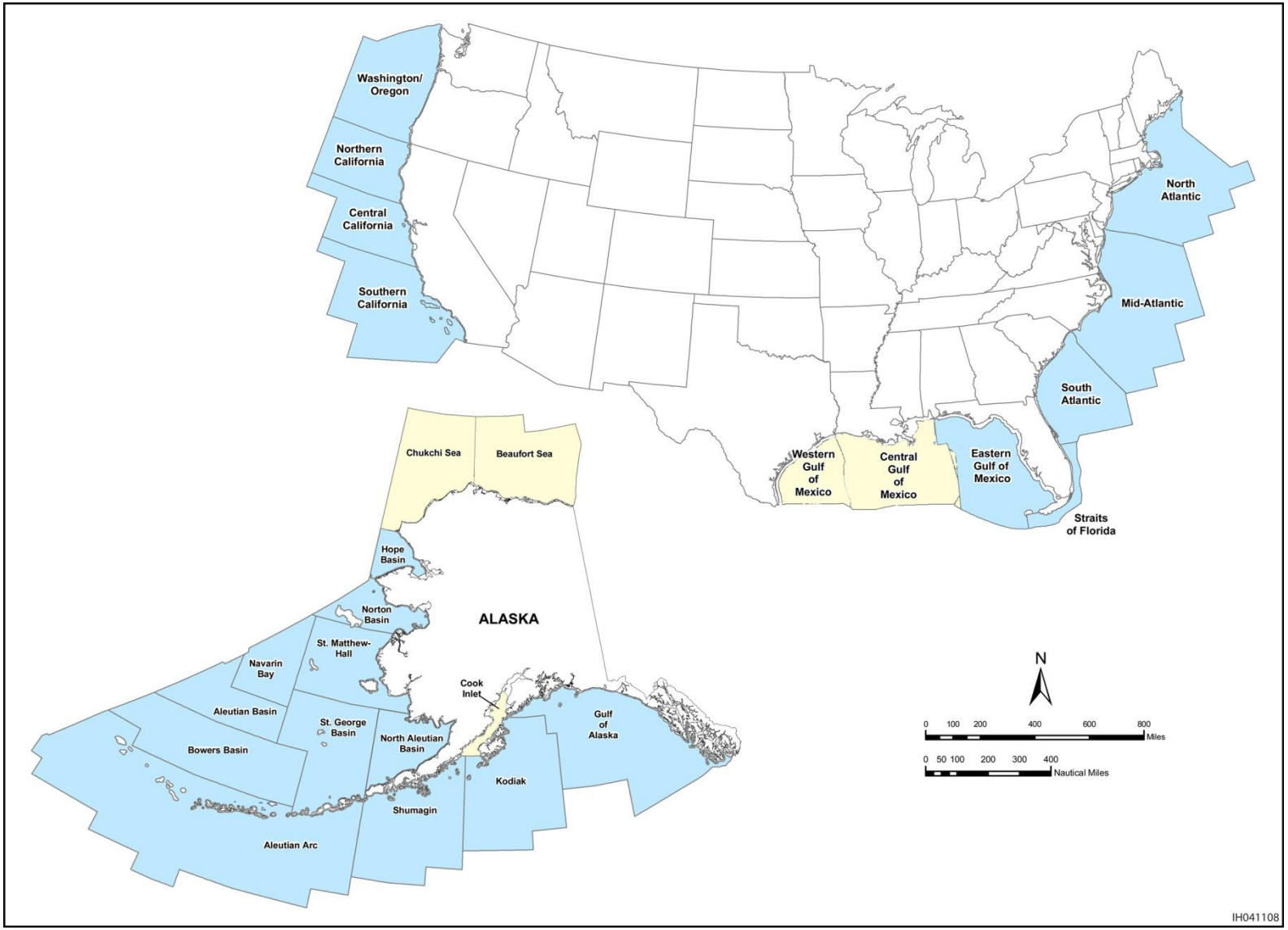

FIGURE 4.4.1-1 OCS Planning Areas Where Leasing for Oil and Gas Development May Occur under the 2012-2017 OCS Leasing Program

TABLE 4.4.1-2 Depth Distribution of New Infrastructure and Expected Natural Gas and Oil Production on the GOM OCS

			% of New Wells		% of New Platforms		% of New Gas Production		% of New Oil Production	
OCS Depth Zone (m)	OCS Area	OCS Sub-area	OCS Area	OCS Sub-area	OCS Area	OCS Sub-area	OCS Area	OCS Sub-area	OCS Area	OCS Sub-area
0–60	Shelf	Inner	52	37	95	87	51	37	7	5
60–200		Outer		15		8		14		2
200–800	Slope	Upper	48	12	5	2	49	7	93	12
800–1,600		Mid		20		2		22		44
1,600–2,400				-[a]		-		-		-
>2,400		Lower		16		1		20		37

[a] No wells, platforms, or production are expected for this depth range.

4.4.1.2 Alaska – Cook Inlet

The Cook Inlet has had oil and gas operations in State waters since the late 1950s and currently possesses a well-established oil and gas infrastructure. There has been no oil and gas activity in the Cook Inlet Planning Area. A single sale in Cook Inlet is included in the proposed action as a special interest sale, meaning that the planning process for the sale will not start until industry expresses an interest in holding the sale. The most recent OCS lease sale in Cook Inlet was in 2004 when no leases were purchased. The most recent sale in which OCS leases were purchased occurred in 1997 when two leases were purchased.

Table 4.4.1-3 summarizes the assumed levels of exploration and development that could occur under the proposed action (Alternative 1). Oil and gas development that could occur in the Cook Inlet OCS Planning Area under the proposed action is expected to use both new and existing infrastructure. Exploration drilling would employ fixed rigs (such as jack-up and mobile gravity-base rigs) in water depths up to 150 ft (46 m) and floating rigs (semisubmersible rigs, drill ships, or barges) in deeper water areas. Production wells will most likely use fixed platforms with subsea well tie-backs to supplement on-platform wells. New subsea pipelines would connect offshore installations to existing onshore facilities. Oil and gas would be carried by new onshore pipelines over relatively short distances to existing oil refineries in Nikishi and natural gas transmission facilities in the Kenai area, respectively.

TABLE 4.4.1-3 Proposed Action (Alternative 1) – Exploration and Development Scenario for Cook Inlet

Scenario Element	Cook Inlet
Number of sales	1
Years of activity	40
Oil production (Bbbl)[a]	0.1–0.2
Natural gas production (tcf)[a]	0–0.7
Platforms	1–3
No. of exploration and delineation wells	4–12
No. of development and production wells	42–114
Miles of new offshore pipeline	25–150
Miles of new onshore pipeline[b]	50–105
Vessel trips/week	1–3
Helicopter trips/week	1–3
New pipeline landfalls	0–1
New shore bases	0
New processing facilities	0
New waste disposal facilities	0
Platforms removed with explosives	0
Drill Fluids/Well (bbl)	
Exploration and delineation wells	500 – discharged at well site.
Development and production wells	All treated and disposed of in the well.
Drill Cuttings (dry rock)/Well (tons)	
Exploration and delineation wells	600 – discharged at well site.
Development and production wells	All treated and disposed in the well.
Bottom Area Disturbed (ha)	
Platforms (1.5 ha/platform)	1.5–4.5
Pipeline (1.4 ha/mile)	35–210

[a] Bbbl = billion barrels; tcf = trillion cubic feet.

[b] New onshore pipelines would deliver oil to existing refineries in Nikiski and natural gas to transmission facilities in the Kenai area.

4.4.1.3 Alaska – Arctic

In contrast to oil and gas development in the GOM OCS, and with the exception of a single production site (Northstar) that has an actual surface location in Alaskan State waters, there has been no development activity from a structure in Arctic OCS areas. Since 1979, ten lease sales have been held in the Beaufort Sea Planning Area and three in the Chukchi Sea Planning Area (http://www.alaska.boemre.gov/lease/hlease/LeasingTables/lease_sales.pdf). The 2008 Lease Sale 193 for the Chukchi Sea Planning Area (MMS 2007a) is of note because of the high industry interest expressed through the acquisition of 487 leases and the more than $2.7 billion received by the government in high bids. No activity has resulted from this lease

sale because of litigation that remains unresolved at the time this draft PEIS is being written. The scenario put forth for the Arctic in the 2012–2017 program in Table 4.4.1-4, however, assumes that the exploration and development activities anticipated as a result of Sale 193 will have occurred prior to the beginning of the development and production activities listed in the table. In particular, the scenario was developed using the assumptions that the discovery and development of a 1-Bbbl oil field has already occurred, a pipeline has been installed from the OCS production area in the Chukchi Sea to Point Belcher near Wainwright, Alaska, and support base facilities have been constructed there as well. As a result of these assumptions, the scenario in Table 4.4.1-4 includes no new pipeline landfalls or support bases, since these would have already been constructed as a result of Sale 193 (BOEMRE 2011n). Also, oil discoveries less than 1 Bbbl were assumed not to be economically feasible in the Program, because an initial larger field needed to justify the construction of a pipeline to shore and coastal service facilities. It is assumed that development as a result of lease sales under the Proposed Action Alternative would utilize existing infrastructure, and that fields smaller than 1.0 Bbbl could be produced.

The draft PEIS assumes that the most likely locations for oil and gas activities in the Arctic OCS will be in the areas that have been already leased in recent sales. While activities within the entire Chukchi and Beaufort Sea Planning Areas will be considered in the analyses that follow, the analyses assume that the most likely locations for exploration and development activities will occur in the areas shown in Figure 4.4.1-2. It is assumed that these areas reflect industry's current assessment of the best hydrocarbon prospects through its large investments in acquiring the leases. It is reasonable to assume that industry will explore and develop these areas before moving into other areas currently considered less promising.

In the Beaufort Sea Planning Area, exploration is assumed to use artificial gravel islands or extended-reach drilling in shallow waters (<6 m [20 ft]), mobile platforms in mid-depths (6–18 m [20–60 ft]), and drill ships in deeper areas of the shelf. Because of severe winter ice pack conditions, it is assumed that development would be limited to the shelf and to depths less than 91 m (300 ft) and platform installation would occur only in the summer (open water) season. Production operations will use gravity-base platforms or gravel islands in shallow water (<12 m [40 ft]) and larger gravity-base platforms in deeper waters (up to 91 m [300 ft]). Oil produced at the platforms will be delivered via trenched subsea pipelines to existing onshore facilities.

In the Chukchi Sea Planning Area, with its greater water depths (>30 m [100 ft]) and more remote location, exploration drilling is expected to employ drill ships. As in the Beaufort Sea, concerns regarding severe winter ice conditions will also limit exploration and development to the shelf and depths <91 m (300 ft) and only in the summer (open water) season. Production operations will use large gravity-base structures with trenched subsea pipelines to transport the oil to landfalls.

In both areas, elevated onshore pipelines will convey the oil and gas from the landfall facilities to production facilities at Prudhoe Bay for ultimate entry to the Trans-Alaska Pipeline System (TAPS). Based on the assumption that a natural gas pipeline connecting the North Slope with the lower 48 States will be in place and operational by 2020, natural gas from the Chukchi and Beaufort Seas may be transported by new and existing aboveground pipelines for entry into such a pipeline (assuming capacity is available in the 2030–2035 time frame).

TABLE 4.4.1-4 Proposed Action (Alternative 1) – Exploration and Development Scenario for Arctic Alaska

Scenario Element	Beaufort Sea	Chukchi Sea
Number of sales	1	1
Years of activity	50	50
Oil production (Bbbl)[a]	0.2–0.4	0.5–2.1
Natural gas production (tcf)[b]	0–2.2	0–8.0
Platforms	1–4	1–5
No. of exploration wells	6–16	6–20
No. of production wells	40–120	60–280
No. of subsea production wells	10	18–82
Miles of new offshore pipeline	30–155	25–250
Miles of new onshore pipeline	10–80	0
Vessel trips/week	1–12	1–15
Helicopter trips/week	1–12	1–15
New pipeline landfalls	0	0
New shore bases	0	0
Drill Fluids/Well (bbl)		
Exploration and delineation wells	500 – discharged at well site	500 – discharged at well site
Development and production wells	All treated and disposed of in the well.	All treated and disposed of in the well.
Drill Cuttings (dry rock)/Well (tons)		
Exploration and delineation wells	600 – discharged at well site	600 – discharged at well site
Development and production wells	All treated and disposed in the well.	All treated and disposed in the well.
Bottom Area Disturbed		
Platforms (1.5 ha/platform)	1.5–6.0	1.5–7.5
Pipeline (1.4 ha/mile)	42–217	35–350
Surface Soil Disturbed		
Pipeline[c]	73–584	0

[a] Bbbl = billion barrels.

[b] Assumes that a natural gas pipeline from the North Slope will be operating by 2020 and have capacity for new supplies in 2030–2035; tcf = trillion cubic feet.

[c] Assumes 46 m (150 ft) wide construction ROW; 7.3 ha (18 ac)/mi.

4.4.2 Accidental Spill Scenario

Oil spills are unplanned accidental events. Depending on the phase of O&G development and the location, magnitude, and duration of a spill, natural resources that may be affected include marine mammals, marine and coastal birds, sea turtles, fish, benthic and pelagic invertebrates, water quality, marine and coastal habitats, and areas of special concern (such as marine parks and protected areas). Spills may also affect a variety of socioeconomic conditions such as local employment, commercial and recreational fisheries, tourism, and subsistence. For

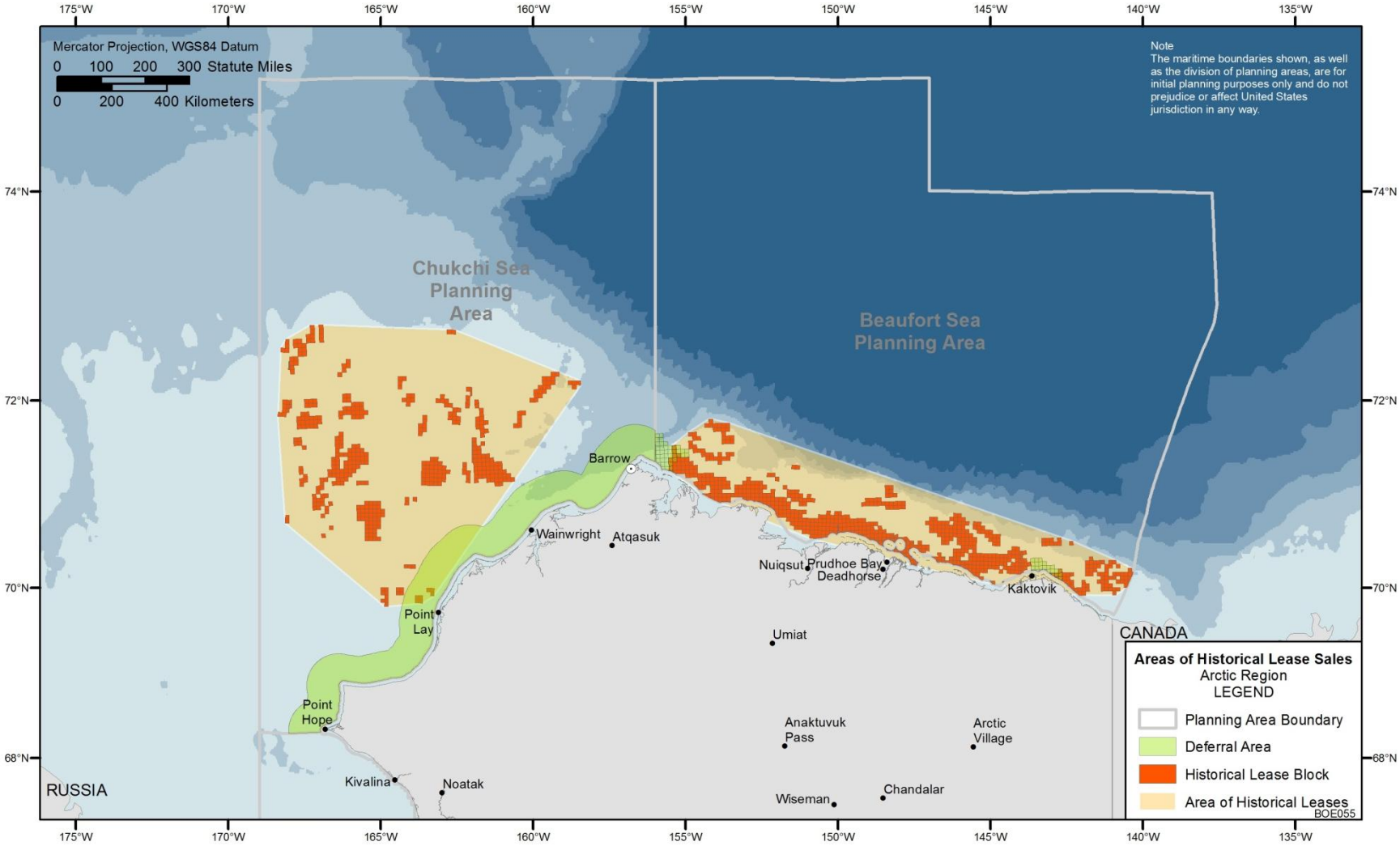

FIGURE 4.4.1-2 Areas of Historical Lease Sales in the Beaufort and Chukchi Seas OCS Planning Areas

this draft PEIS, assumptions have been made about the occurrence and location of small and large oil spills associated with the Program. Table 4.4.2-1 presents the assumptions for the GOM, the Beaufort and Chukchi Seas, and Cook Inlet. The draft PEIS also considers the potential impacts of a very large but low probability catastrophic discharge events (CDE), and the assumptions for such events are presented in Table 4.4.2-2.

The source and number of assumed accidental spills were based on the volume of anticipated oil production in each area, the assumed mode of transportation (pipeline and/or tanker), and the spill rates for large spills. It is also assumed that these spills would occur with uniform frequency over the life of the proposed action. Platform spills are assumed to occur in areas proposed for lease consideration. Pipeline spills are assumed to occur between the proposed lease areas and existing infrastructure. Tanker and barge spills are assumed to occur along the tanker and barge routes from the lease areas to shore facilities.

Spills from tankers carrying oil produced in the Beaufort and Chukchi Sea Planning Areas are assumed to occur outside of those planning areas. It is assumed that oil produced in the Beaufort and Chukchi Sea Planning Areas would be delivered by offshore and onshore pipe to TAPS, with subsequent delivery to the Valdez terminal facilities followed by tanker transport to West Coast ports. Some tankering could also occur in the GOM to transport oil from floating production, storage, and offloading (FPSO) facilities expected to operate in areas of the GOM distant from existing pipelines.

4.4.2.1 Spill Size Assumptions

Spill size will vary greatly depending on the amount of oil released over a period of time as a result of a single accidental event. For this draft PEIS, hypothetical spill sizes were developed using OCS and U.S. tanker spill databases. The sizes of the assumed spills for each spill type (platform, pipeline, tanker, or barge) are approximately equal to the median spill sizes of historical spills for each spill type. Three categories of spill sizes are considered: small, large, and catastrophic.

Small Spills. Analysis of historical data from the GOM, Pacific, and Alaska OCS regions (Anderson, in preparation; MMS 2007b, 2008a). Examination of these data shows that most offshore oil spills have been <1 bbl, accounting for approximately 95% of all OCS spills, yet only less than 5% of the total volume of oil spills on the OCS (Anderson, in preparation; Anderson and LaBelle 2000). Most of the total volume of OCS oil spilled (95%) has been from spills ≥10 bbl. Between 1971 and 2009, 41,514 exploratory and development/production operation wells were drilled on the OCS, and almost 16 billion bbl (Bbbl) of oil was produced. During this period, there were 249 well control incidents during exploratory and development/production operations on the OCS. These incidents were associated with exploratory and development drilling, completion, workover, and production operations. Of these well control incidents, 50 resulted in releases of crude oil ranging from <1 bbl to 450 bbl. In 2010, there were 4 additional well control events. The loss of well control, explosion, and fire on the DWH MODU resulted in the release of an estimated 4.9 million bbl of crude oil until the well was capped on July 15, 2010.

TABLE 4.4.2-1 Oil Spill Assumptions for the Proposed Action (Alternative 1)

		Number of Spill Events[a]		
		Gulf of Mexico Region	Arctic Region	
Scenario Elements	Assumed Spill Volume	Western, Central, and Eastern Planning Areas	Beaufort and Chukchi Planning Areas	South Alaska Region Cook Inlet
Oil Production (Bbbl)[b]		2.7–5.4	0.7–2.5	0.1–0.2
Large (bbl)	≥1,000			
pipeline	1,700[c]	2–5	1–2	1 spill from
platform	5,100[d]	1–2	1	either
tanker	3,100–5,800[e]	1		
Small (bbl)[f]	≥50 to <1,000	35–70	10–35	1–3
	≥1 bbl to <50	200–400	50–190	7–15

[a] The assumed number of spills are estimated using the 1996–2010 spill rates in Anderson (in preparation). For the Alaska OCS region, the 1996–2010 spill rates were compared to fault-tree rates in Bercha Group Inc (2008a, b, 2006). The greater number of spills from Anderson (in preparation) is represented here.

[b] Bbbl = billion barrels.

[c] During the last 15 years (1996–2010), 7 oil spills ≥1,000 bbl occurred from U.S. OCS pipelines. The median spill size was 1,720 bbl. The maximum spill size between 1996 and 2010 from U.S. OCS pipelines was 8,212 bbl.

[d] During the last 15 years (1996–2010), 2 oil spills ≥1,000 bbl occurred from U.S. OCS platforms. During Hurricane Rita, one platform and two jack-up rigs were destroyed, and a combined total of 5,066 bbl was spilled. The median spill size, when not accounting for a decreasing trend in the rate of platform spills, over 1964–2010, is 7,000 bbl.

[e] 3,100 bbl for tankers in the GOM; 5,800 bbl for TAPS tankers transporting Alaska OCS oil.

[f] The number of spills <1000 bbl is estimated using the total spill rate for both pipeline and platform spills.

On the basis of the historical OCS spill data, for this draft PEIS small spills are considered to be ≤1,000 bbl in volume (Table 4.4.2-1). Small spills are further divided into two groups: small spills ≤50 bbl and small spills >50 bbl but ≤1,000 bbl (Table 4.4.2-1).

Large Spills. The spill-size assumptions used for large spills are based on the reported spills from production in the GOM and Pacific OCS and what is anticipated as likely to occur (Anderson, in preparation; MMS 2007b, 2008a; Anderson and LaBelle 2000); there have been no large oil spills in the Alaska OCS region. For this PEIS, a large spill is considered to be ≥1,000 bbl. Between 1964 and 1999, there were 11 platform spills and 16 pipeline spills ≥1,000 bbl on the OCS (Anderson and LaBelle 2000). Between 2000 and 2010, there were 2 platform spills and 4 pipeline spills ≥1,000 bbl (Anderson, in preparation). The median sizes of these large spills from pipelines and platforms for 1964–2010 are 4,550 and 7,000 bbl,

TABLE 4.4.2-2 Catastrophic Discharge Event Assumptions[a]

Program Area	Volume (million bbl)	Duration (days)	Factors Affecting Duration
Gulf of Mexico	0.9–7.2	30–90	Water depth
Arctic			
Chukchi Sea	1.4–2.2	40–75	Timing relative to ice-free season and/or
Beaufort Sea	1.7–3.9	60–300	availability of rig to drill relief well
Cook Inlet	0.075–0.125	50–80	Availability of rig to drill relief well

[a] The Gulf of Mexico OCS region has estimated the discharge rate, volume of a spill, and the extent and duration for a catastrophic spill event for both shallow and deep water (in part) based on information gathered and estimates developed for the Ixtoc (1979) and the Deepwater Horizon (2010) oil spills. The Alaska OCS region has estimated a very large oil spill scenario based on a reasonable, maximum flow rate for each OCS Planning Area, taking into consideration existing geologic conditions and information from well logs. The number of days until a hypothetical blowout and discharge from a well could be contained was also estimated. These are discharge volumes and do not account for decreases in volume from containment or response operations.

respectively (Anderson, in preparation). The median sizes of these large spills from pipelines and platforms for 1996–2010 are 1,700 and 5,100 bbl, respectively (Anderson, in preparation). From 1971 to 2010, the DWH event in 2010 was the only loss of well control incident on the OCS that resulted in a spill volume ≥1,000 bbl. This catastrophic discharge event is discussed separately below.

Catastrophic Discharge Event. The CDE estimate is intended to provide a scenario for a low-probability event with the potential for catastrophic consequences. Past oil spills that may be relevant include the *Exxon Valdez* oil spill (262,000 bbl) (non-OCS program related) in Prince William Sound, south central Alaska, the Ixtoc oil spill (3,500,000 bbl) (non-OCS program related) in the western GOM, and the DWH event (4,900,000 bbl) in the northern GOM (McNutt et al. 2011). For this draft PEIS, CDEs were developed for each program area, taking into account considerations of water depth, weather conditions (such as ice cover) and the potential availability of response equipment for drilling relief wells. For the GOM Planning Areas, the CDE volumes range from 900,000 to 7,200,000 bbl, depending on the depth at which the loss of well control occurs (Table 4.4.2-2). For the Cook Inlet Planning Area, the CDE volume estimates range from 75,000 to 125,000 bbl, depending on the availability of a rig to drill a relief well. For the Chukchi Sea and Beaufort Sea Planning Areas, the CDE volume estimates range from 1,400,000 to 2,100,000 bbl and 1,700,000 to 3,900,000 bbl, respectively. For these CDE estimates, the range in volumes depends on the timing of the CDE relative to the ice-free (open water) season and on the availability of a rig to drill a relief well.

4.4.2.2 Spill Number Assumptions

The number of spills <1,000 bbl assumed to occur during the years of activity of the proposed action is estimated by multiplying the oil spill rate for each of the spill size groups by the projected oil production as a result of the proposed action. Details on the methodology for estimating spill rates (and thus spill number) can be found in Anderson (in preparation). As shown in Table 4.4.2-1, most spills assumed to occur during the duration of the proposed action would be in the small-volume category (≤1,000 bbl). As the spill size increases, the occurrence rate decreases, so the number of estimated spills decreases. Estimates of the number of large spills for the Beaufort and Chukchi Sea Planning Areas were also derived from fault-tree modeled rates and compared to the rates from Anderson (in preparation) (Bercha Group, Inc. 2008).

4.4.3 Potential Impacts on Water Quality

4.4.3.1 Gulf of Mexico

This section analyzes impacts on GOM coastal and marine waters. Coastal waters, as defined here, include the bays and estuaries along the coast and State waters extending out to the inward boundary of the territorial seas. Marine waters extend from this boundary out to the Exclusive Economic Zone, or approximately 322 km (200 mi) from the coast.

Table 4.1.1-1 details impacting factors associated with oil and gas activities and the development phase in which they can occur. The following factors affecting water quality have been identified: disturbance of bottom sediments, wastes and disposal, vessel traffic, and accidental spills. The water quality stressor activities associated with oil and gas development are shown in Table 4.4.3-1.

Discharges to waters of the GOM are regulated by National Pollution Discharge Elimination System (NPDES) OCS General Permit No. GMG290000 until Sept 30, 2012, for the western GOM (off of Texas and Louisiana) and NPDES OCS General Permit No. GMG460000 until March 31, 2015, for the eastern GOM, including the Mobile and Viosca Knoll lease blocks in the Central Planning Area.

Common impacts on water quality in both coastal and marine areas include impacts from vessel traffic, well drilling, and operational discharges. During drilling, drilling muds are circulated down a hollow drill pipe, through the drill bit, and up the annulus between the drill pipe and the borehole. Drilling muds are used for the lubrication and cooling of the drill bit and pipe. The muds also remove the cuttings that come from the bottom of the oil well and help prevent loss of well control by acting as a sealant. The drilling muds carry drill cuttings (i.e., crushed rock produced by the drill bit) to the surface. The drilling muds are then processed on the platform to remove the cuttings and recycled back down the well. The separated cuttings are, in most cases, discharged to the ocean. There are three classes of drilling muds used in the

TABLE 4.4.3-1 Water Quality Impact Matrix

	Water Quality			
Stressor and O&G Activity	Coastal Water	Shelf Water	Deepwater	Marine Water
Vessel Traffic Exploration, Construction, Operation, Decommissioning	X	X	X	X
Well Drilling: Exploration, Development	X	X	X	X
Pipelines: Trenching, Landfalls, Construction	X	X		X
Chemical Releases: Drilling, Normal Operational Discharges, Sanitary Wastes	X	X	X	X
Platforms: Anchoring, Mooring, Removal	X	X	X	X
Onshore Construction	X			
Oil Spills	X	X	X	X

industry: water-based muds (WBMs), oil-based muds (OBMs), and synthetic-based muds (SBMs) (Neff et al. 2000). The WBMs used in most offshore drilling operations in U.S. waters consist of fresh- or saltwater, barite, clay, caustic soda, lignite, lignosulfonates, and/or water-soluble polymers. The OBMs use mineral oil or diesel oil as the base fluid rather than fresh- or saltwater. They offer several technical advantages over WBMs for difficult drilling operations; however, because of their persistence and adverse environmental effects, OBMs and associated cuttings have been banned from ocean discharges in U.S. waters and must be transported to shore for disposal (Neff et al. 2000). The synthetic-based fluids (SBFs) are a family of products developed in the 1990s to provide drilling performance similar to that of oil-based fluids, but with improved biodegradation characteristics and decreased ecotoxicity (Neff et al. 2000). The types that would be used most frequently would be those that meet the requirements of the NPDES permit. The SBF-wetted cuttings are permitted for ocean discharge, while the spent fluid is transported to shore for reuse or disposal (Neff et al. 2000).

Discharges of drilling muds and cuttings during normal operations are regulated by NPDES general permits issued by the U.S. Environmental Protection Agency (USEPA). In areas where disposal of drilling muds and/or cuttings at sea are permitted under an NPDES general permit and BOEM and BSEE regulations, their environmental effects are localized because of settling, mixing, and dilution (Montagna and Harper 1996; Neff et al. 2000; Continental Shelf Associates 2004c). The majority of cuttings are found within 250 m (820 ft) of a drilling site (Continental Shelf Associates 2004c). Constituents of SBF cuttings have been found in an approximately 1 ha (2.5 ac) area surrounding a drilling rig at concentrations that may cause harm to wildlife (Neff et al. 2000).

Produced water is water that is brought to the surface from an oil-bearing formation during oil and gas extraction. It is the largest individual discharge produced by normal operations. Small amounts of oil are routinely discharged in produced water during OCS operations. The USEPA has set an effluent limitation of 29 mg/L for the oil content of produced waters (MMS 2007b). Produced water may contain specialty chemicals added to the well for process purposes (e.g., biocides and corrosion inhibitors) and chemicals added during treatment

of the produced water before its release to the environment (e.g., water clarifiers). Produced water can have elevated concentrations of several constituents, including salts, petroleum hydrocarbons, some metals, and naturally occurring radioactive material (NORM). Petroleum hydrocarbons in produced water discharges are a major environmental concern. The most abundant hydrocarbons in produced water are benzene, toluene, ethylbenzene, and xylenes (BTEX) and low-molecular-weight saturated hydrocarbons. The BTEX compounds rapidly evaporate into the atmosphere, leaving behind less volatile, heavier compounds (weathering) (NRC 2003b). Polycyclic aromatic hydrocarbons (PAHs) are heavier hydrocarbons in produced water and are a concern because of the toxicity of some PAHs and their persistence in the marine environment (Rabalais et al. 1991).

The NORM waste in produced water includes the radium isotopes Ra-226 and Ra-228 and is a concern because it is radioactive. However, in produced water discharges, radium coprecipitates with barium sulfate and is not available for uptake by organisms (Neff 2002).

Generally, the amount of produced water is low when production begins but increases over time near the end of the field life. In a nearly depleted field, production may be as high as 95% water and 5% fossil fuels (Rabalais et al. 1991). The National Research Council (2003a) estimated that the total amount of produced water being released into GOM waters was 660 million bbl/yr in the 1990s. Between 1996 and 2005, the annual volume of produced water varied between 432 million bbl/yr and 686 million bbl/yr, with an average discharge of 596 million bbl/yr (MMS 2007b).

Before being discharged into the ocean, produced water is typically treated and must meet NPDES requirements regarding discharge rate, contaminant concentration, and toxicity, thereby reducing the potential for contamination. However, the discharge of produced water into the sea may degrade water and sediment quality in the immediate vicinity of the discharge point because of its potential constituents. Studies have shown contaminated sediments exist in areas up to 1,000 m (3,280 ft) from a produced water discharge point, indicating water quality in that zone has been affected by produced water discharges (Rabalais et al. 1991). Because discharge points are typically much farther apart than 1,000 m (3,280 ft), no interactions that would measurably affect water quality are expected between them, and background concentrations are expected to exist away from the immediate discharge location. Two recent studies have shown that produced water discharges do not make a significant contribution to the hypoxic conditions that are seen in the GOM (Veil et al. 2005; Bierman et al. 2007).

Normal operations for the proposed action would also involve the use of vessels with associated impacts. Compliance with NPDES permits and USCG regulations would prevent or minimize most impacts on the environment caused by ship traffic.

The placement of drilling units and platforms would disturb bottom sediments and produce turbidity in the water. This impact would be unavoidable; however, these impacts would be temporary and water quality would return to normal (e.g., background concentrations of suspended solids) within minutes to hours without mitigation because of mixing, settling, and dilution.

4.4.3.1.1 Routine Operations.

Coastal Waters. Routine activities potentially affecting coastal water quality include pipeline landfalls, well completion activities, platform construction, and operation discharges. The estimated exploration and development scenario for the GOM for the proposed action is presented in Table 4.4.1-1 and estimated depth distribution of the activities in Table 4.4.1-2.

Construction and installation of exploratory and development wells (up to 100 and 600, respectively), platforms (up to 450), and offshore pipelines (up to 12,000 km [7,500 mi]) would affect water quality and disturb habitats (see Table 4.4.1-1). Such activities would disturb bottom sediments and increase the turbidity of the water in the area of construction. Trenching operations to bury pipelines would produce turbidity (i.e., increased suspended solids) in the coastal waters along pipeline corridors. The disturbance of bottom sediments caused by these operations would be unavoidable. However, these impacts would be temporary, and water quality would return to normal (i.e., background concentrations) without mitigation, once these activities were completed because of settling and mixing.

Construction of new onshore support facilities (up to 11 pipeline landfalls, 6 pipe yards, and 12 processing facilities) could affect the quality of nearshore and fresh waters in the GOM Planning Areas. During land site preparation, vegetation is typically cleared from the area, compacting the topsoil, because of the constant movement of heavy machinery. This compaction would reduce the water retention properties of the soil and increase erosion and surface runoff from the site. Water quality would be degraded by increases in site runoff of particulate matter, heavy metals, petroleum products, and chemicals to local streams, estuaries, and bays. Proper siting of facilities and requirements associated with NPDES construction permits should largely mitigate these impacts.

The OCS service and construction vessel traffic to and from platform sites within the planning area (up to 600 vessel trips per week) would also affect water quality through the permitted release of operational wastes. Routine vessel-associated discharges that could affect coastal water quality include sanitary wastes and bilge water. Bilge water discharges from support vessels could contain petroleum and metals from machinery. Bilge water and sanitary discharges to larger coastal water channels would produce local and temporary effects because of the large volume of water available to dilute the discharges and the presence of currents that would promote mixing. However, in confined portions of some channels, there might be insufficient water volume or currents for mixing and dilution. In such regions, water quality could be degraded. Compliance with applicable NPDES permits and USCG regulations would prevent or minimize most impacts on receiving waters. Discharges in coastal areas are regulated by State-issued or Federal NPDES permits specifically for coastal areas.

Produced water discharges were banned in coastal waters of the GOM in the late 1990s, and reinjection of produced water is practiced in coastal areas to avoid discharges (NRC 2003b; Wilson 2007).

Marine Waters. Marine waters can be divided into continental shelf waters and deep waters. Continental shelf waters are defined as those waters that lie outside of the coastal waters

and have a depth less than 305 m (1,000 ft). Deep waters are located in regions that are equal to or deeper than 305 m (1,000 ft).

Routine operations that could affect water quality include anchoring, mooring, drilling and well completion activities, well testing and cleanup operations, flaring/burning, facility installation and operations, support service activities, decommissioning, and site clearance. Construction and installation of exploratory and development wells (up to 1,200), platforms (up to 450), and offshore pipelines (up to 12,000 km [7,500 mi]) would affect water quality and disturb habitats (see Table 4.4.1-1).

As with coastal areas, OCS vessel traffic to and from platform sites within the planning area (up to 600 vessel trips per week) would also affect water quality through the permitted release of operational wastes (such as bilge water). Because of the relatively small volumes that would be discharged, these waste materials would be quickly diluted and dispersed, and any impacts on water quality would be highly localized and temporary. Compliance with applicable NPDES permits and USCG regulations would prevent or minimize most impacts on receiving waters.

Sanitary and domestic waste and deck drainage would occur from platforms, drilling vessels, and service vessels as part of normal operations and could contribute to water quality degradation. However, sanitary and domestic wastes would be routinely processed through onsite waste treatment facilities before being discharged overboard, and deck drainage would be treated onsite to remove oil and then discharged. Sand and sludge recovered from the treatment processes would be containerized and shipped to shore for disposal. Impacts on water quality from such discharges would require no mitigation because of the treated nature of the wastes, the small quantities of discharges involved, and the mixing and dilution of the wastes with large volumes of water.

Discharges associated with drilling and production are discussed in Section 4.4.3.1. Normal operations for the proposed action would also involve the use of vessels with associated impacts, such as those discussed for related impacts on coastal areas. Compliance with NPDES permits and USCG regulations would prevent or minimize most impacts on the environment.

The placement of drilling units and platforms would disturb bottom sediments and produce turbidity in the water. Pipeline trenching, required in water depths less than 61 m (200 ft), would also produce turbidity along pipeline corridors. This impact would be unavoidable; however, these impacts would be temporary, and water quality would return to normal (e.g., background concentrations of suspended solids) within minutes to hours without mitigation because of mixing, settling, and dilution.

As discussed in Section 3.4.1.2, hypoxic conditions exist on the Louisiana-Texas shelf. The size of the hypoxic zone varies from year to year. The hypoxic zone attained a maximum measured extent in 2002, when it encompassed about 22,000 km^2 (8,494 mi^2). Normal operations from oil and gas production in the GOM could affect the extent and severity of the hypoxic zone through discharges and accidental releases. Very preliminary calculations reveal that ammonium and oil and grease contained in produced water are a small percentage of that

contributed by the Mississippi River to the hypoxic zone (Rabalais 2005). A study that monitored oxygen-demanding substances and nutrients in the produced water discharges from 50 platforms found that produced water discharges contributed less than 1% of the oxygen-demanding substances to the hypoxic zone (Veil et al. 2005).

For the proposed action, the compositions and volumes of discharges would be expected to be about the same as those observed historically, and compliance with existing NPDES permits would minimize impacts on receiving waters (e.g., through limitations on concentrations of toxic constituents). Water quality likely would recover without mitigation when discharges ceased because of dilution and dispersion.

Although deepwater operations and practices are similar to those used in shallower environments, there are some significant differences. Three of these are seafloor discharges from pre-riser and riserless drilling operations, discharge of cuttings wetted with SBFs, and more extensive and frequent use of chemical products to enhance oil and gas throughput because of the temperatures and pressures present at the seafloor, including their use within pipelines to facilitate the transport of large quantities of methanol and other chemicals to and from the shore.

Floating production facilities are used in deepwater rather than conventional, bottom-founded (i.e., fixed) platforms. These deepwater facilities include floating production semisubmersibles, tension leg platforms, and spars (Harbinson and Knight 2002). Often these facilities are surface hubs for several subsea systems. Therefore, in deep water, there will be far fewer and more widely spaced surface facilities than on the shelf, but these facilities will have increased discharges of produced waters over time due to the larger volume being processed.

In order to enhance the throughput of oil and gas in deep water, more extensive and frequent use of some chemical products is anticipated because of the temperatures and pressures encountered at the seafloor. Chemicals most likely to be present in deepwater operations and drilling include monoethylene glycol, methanol, corrosion inhibitors, and biocides (Grieb et al. 2008). The toxicity of these substances varies, but the impact on water quality would be temporary and localized (within feet of a release), due to the small quantities in which they would likely be released and the amount of dilution and mixing that would occur in a subsea environment (Grieb et al. 2008).

Deepwater activities could incrementally increase support activities and the expansion, construction, or modification of onshore support bases due to the deeper draft of these support vessels. The impacts resulting from this growth would be common to all OCS support facilities (point-source waste discharges, runoff, dredging, and vessel discharges) and not specific to deepwater activities. Short-term degradation of water quality might increase at a few support base locations that would be expected to grow as a consequence of deepwater activities (including Corpus Christi, Galveston, and Port Fourchon).

4.4.3.1.2 Accidents.

Coastal Waters. Accidental releases could affect the quality of coastal water in the GOM. The magnitude and severity of impacts would depend on spill location and size, type of product spilled, weather conditions, and the water quality and environmental conditions at the time of the spill.

Under the proposed action, the number and types of spills assumed to occur in the GOM Planning Area include up to seven large spills (i.e., ≥1,000 bbl), up to five spills at a volume of 1,700 bbl from pipelines, up to two spills at a volume of 5,000 bbl from platforms, and up to one spill at a volume of 3,100 bbl from a tanker. Between 35 and 70 small spills with volumes between 50 and 999 bbl are assumed to occur, as well as between 200 and 400 very small spills with volumes between 1 and 50 bbl (Table 4.4.2-1).

Weathering processes that transform the oil, such as volatilization, emulsification, dissolution, chemical oxidation, photo-oxidation, and microbial oxidation, may reduce impacts of oil spills in the GOM Planning Areas on coastal water quality (NRC 2003b; NOAA 2005). Dissolution, which is a small component of weathering, can be important to biological communities because the most soluble fractions are often the most toxic (Shen and Yapa 1988). Because oil is generally less dense than water, it would tend to float on the sea surface. Lighter oil fractions such as BTEX would readily evaporate from the surface and, therefore, would not be a continuing source of potential water contamination. Following a spill, light crude oils can lose as much as 75% of their initial volume to evaporation as the lighter components (e.g., BTEX) change from the liquid to the gas phase; medium-weight crude oils can lose as much as 40% (NRC 2003b).

If a large spill occurred in enclosed coastal waters or was driven by winds, tides, and currents into an enclosed coastal area, water quality would be adversely affected. These impacts could be increased if they occurred in areas with degraded water quality, such as areas continuing to be affected by the DWH. Similarly, if a large tanker spill were to happen near port, adverse impacts on coastal waters could occur. In such a low-energy environment (i.e., an environment in which there is limited wave and current activity), the oil would not be easily dispersed, and weathering could be slower than it would be in the open sea. Effects on water quality could persist if oil reached coastal wetlands and was deposited in fine sediments, becoming a long-term source of pollution because of remobilization. In such locations, spill cleanup might be necessary for the recovery of the affected areas. Potential impacts from spill response and cleanup activities are discussed below. As a result of the DWH event, residual oil was still being removed from shorelines as of January 2011 (Geoplatform 2011a, b). However, supratidal buried oil, small surface residue balls, and submerged oil mats are three types of residual oil from the DWH spill in the nearshore zone that were identified as being more damaging to completely remove from coastal habitats than to let them remain and naturally attenuate (OSAT-2 2011). Oiled shorelines might also be washed with warm or cold water, depending on the shore's location.

Small oil spills (<1,000 bbl) or very small oil spills (<50 bbl) would produce small but measurable impacts on water quality. Assuming that all small and very small spills would not

occur at the same time and place, water quality would rapidly recover without mitigation because of mixing, dilution, and weathering. However, impacts could be increased if they occurred in areas with degraded water quality, such as areas continuing to be affected by the DWH event.

Marine Waters. Accidental releases could affect the quality of marine waters in the GOM Planning Areas. The number and types of spills assumed to occur in the GOM Planning Areas are the same as those discussed above for coastal waters. The magnitude of these impacts and the rate of recovery would depend on the location and size of the spill, the type of product spilled, weather conditions, and environmental conditions at the time of the spill. Failures of production-related piping, seals, and connections have been identified as key risks for releases that may affect water quality in deepwater environments, with loss of well control presenting the highest risk of environmental impacts (Grieb et al. 2008). Because of the depths of some deepwater drilling operations, servicing any leak identified during subsea drilling and production operations would be more difficult and require remotely operated vehicles for depths greater than 610 m (2,000 ft) (Grieb et al. 2008). Each piping connection presents a potential for leakage due to human error, corrosion, or erosion (Grieb et al. 2008). In general, oil spilled below the surface rises rapidly as droplets that coalesce to form a slick. Standard response procedures for a spill could then be used.

Because deepwater operations can be located far from shore, tankers could be used to shuttle crude oil to shore stations. This transport of oil from operations in deep water has the potential to produce spills that could affect coastal waters within a very short time if the spill occurred near the port. It is expected that such spills could release approximately 3,100 bbl of oil. Such a release could retain a large volume of oil in the slick at the time it contacted land.

Small oil spills (<1,000 bbl) and very small oil spills (<50 bbl) would have measurable impacts on water quality. If it is assumed that all small and very small spills would not occur at the same time and place, water quality would rapidly recover without mitigation because of mixing, dilution, and weathering.

Spill Response and Cleanup. Spill response and cleanup activities in coastal and marine water could include, depending on location, use of chemical dispersants, *in situ* burning, use of vessels and skimmers, and beach cleaning and booming (BOEMRE 2011k).

Dispersants are combinations of surfactants and solvents that work to break surface oil into smaller droplets that then disperse on the surface and into the water column. Many factors affect the behavior, efficacy, and toxicity of a particular dispersant, including water temperature, surface salinity, wave and wind energy, light regime, water depth, type of oil, concentration of dispersant, how the dispersant is applied (constant or intermittent spikes), and exposure time to organisms. Dispersants are used to degrade an oil spill more quickly through increasing surface area and to curtail oil slicks from reaching shorelines (Word et al. 2008). As oil breaks into smaller droplets, it can distribute vertically in the water column. If oil droplets adhere to sediment, the oil can be transported to the seafloor and interstitial water in the sediment. In shallow nearshore waters, wind, wave, and current action would more likely mix the dispersant-oil mixture into the water column and down to the seafloor environment. Chemically dispersed oil is thought to be more toxic to water column organisms than physically dispersed oil, but the

difference is not clear-cut, and generally the toxicity is within the same order of magnitude (NRC 2005b).

In situ burning is used to reduce an oil spill more quickly and to curtail oil slicks from reaching shorelines. *In situ* burning could increase the surface water temperature in the immediate area and produce residues. The uppermost layer of water (upper millimeter or less) that interfaces with the air is referred to as the microlayer. Important chemical, physical, and biological processes take place in this layer, and it serves as habitat for many sensitive life stages and microorganisms (GESAMP 1995). Disturbance to this layer through temperature elevation could cause negative effects on biological, chemical, and physical processes.

Residues from *in situ* burning can float or sink depending on the temperature and age of the residue. Floating residue can be collected; however, residues that sink could expose the benthic waters and sediment to oil components as the residue degrades on the seafloor.

The NOAA Office of Response and Restoration states, "Overall, these impacts [from open water *in situ* burning] would be expected to be much less severe than those resulting from exposure to a large, uncontained oil spill" (NOAA 2011d).

Oiled shorelines might be washed with warm or cold water, depending on the shore's location. Oil dispersants and surface washing agents used to clean up a spill could also be a source of impacts to water quality for coastal areas in the event of a spill (EIC and NCSE 2010; Coastal Response Research Center 2010). Beach cleaning and booming activities could result in effects from suspended sediment in waters and resettlement of sediments elsewhere, possible resuspension of hydrocarbons, and runoff of treatment-laden waters that could affect nearshore temperature and nutrient concentrations (BOEMRE 2011k).

Catastrophic Discharge Event. For the GOM Planning Areas, a low-probability CDE could have a volume of 900,000 to 7,200,000 bbl (Table 4.4.2-2). A catastrophic discharge event in either coastal or marine water could present sustained degradation of water quality from hydrocarbon contamination in exceedence of State and Federal water and sediment quality criteria. These effects could be significant depending upon the duration and area impacted by the spill. Additional effects on water quality would occur from response and cleanup vessels, *in situ* burning of oil, dispersant use, discharges and seafloor disturbance from relief well drilling, and activities on shorelines associated with cleanup, booming, beach cleaning, and monitoring.

4.4.3.2 Alaska – Cook Inlet

This section analyzes impacts on coastal and marine waters in the Cook Inlet Planning Area. Coastal waters, as defined here, include the bays and estuaries along the coast and State waters extending out to the inward boundary of the territorial seas. Marine waters extend from this boundary out to a water depth of 200 m (656 ft).

Section 4.1.1 details impacting factors for activities associated with oil and gas activities and the development phases in which they can occur. The following factors affecting water

quality have been identified: disturbance of bottom sediments, wastes and disposal, vessel traffic, and accidental spills. The water quality stressor activities associated with oil and gas are shown in Table 4.4.3-1. Note that no onshore construction or pipeline landfalls are anticipated for the Cook Inlet Planning Area for the lease sales during 2012-2017 period.

Discharges to waters of Cook Inlet are regulated by NPDES OCS General Permit No. AKG-31-5000 until July 2, 2012.

Common impacts on water quality in both coastal and marine areas include those from vessel traffic, well drilling, and operational discharges. The types of impacts expected are the same as those discussed above in Section 4.4.3.1.

4.4.3.2.1 Routine Operations.

Coastal Waters. Routine activities potentially affecting coastal water quality include pipeline landfalls, well completion activities, platform construction, and operational discharges. The estimated exploration and development scenario for Cook Inlet is presented in Table 4.4.1-3.

Construction and installation of exploratory and development wells (up to 12 and 114, respectively), platforms (up to 3), and offshore pipelines (up to 240 km [150 mi]) would affect water quality and disturb habitats (see Table 4.4.1-3). Trenching operations to bury pipelines would produce turbidity (i.e., increased suspended solids) in the coastal waters along pipeline corridors. Increased water turbidity would also result from placing drilling units and platforms. The disturbance of bottom sediments caused by these operations would be unavoidable. However, these impacts would be temporary, and water quality would return to normal (i.e., background concentrations) without mitigation, once these activities were completed, because of settling and mixing.

Construction of new onshore pipelines (up to 169 km [105 mi]) would also impact coastal water quality in the Cook Inlet Planning Area. Proper siting of facilities and requirements associated with NPDES construction permits would largely mitigate these impacts. The impacts on water quality would range from negligible to minor, depending on site location and construction and mitigation activities.

Increased turbidity from construction and installation activities would occur in the immediate area of the activity. Contaminants introduced into Cook Inlet waters by these activities would be diluted and dispersed by complex currents associated with the tides (diurnal tidal variations at the upper end of the Cook Inlet at Anchorage can be 9 m [30 ft]), estuarine circulation, wind-driven waves, and Coriolis forces (MMS 2003a; Royal Society of Canada 2004). Seawater enters the Lower Cook Inlet from the Gulf of Alaska at the Kennedy Entrance south of the Kenai Peninsula, and fresh water enters the inlet from numerous streams along the east, north, and west shorelines; major freshwater inputs include the Susitna and Kenai Rivers. Seawater circulates northward in Cook Inlet along its eastern boundary, mixes with fresh water in the northern end, and flows southward along the western boundary. Water exits the lower Cook Inlet through Shelikof Strait and discharges into the Gulf of Alaska (MMS 2002a).

Surface currents in Cook Inlet can exceed 5 knots (5.7 mph), and bottom currents can reach 1.5 knots (1.7 mph) (Royal Society of Canada 2004). Approximately 90% of waterborne contaminants would be flushed from the lower Cook Inlet within about 10 months (MMS 2003a). Contaminants flushed from Cook Inlet would pass through Shelikov Strait and enter the Gulf of Alaska. Because of dilution, settling, and flushing, impacts from these activities would be local and temporary.

In addition to affecting the turbidity of coastal waters in the Cook Inlet, construction activities would produce waste materials. The majority of wastes generated during construction and developmental drilling would consist of drill cuttings and spent muds (MMS 2002a). Drilling muds and cuttings generated when installing exploration and delineation wells would be discharged at the well site. The volume of drilling fluids and cuttings vary depending upon the well characteristics, but, in general, fluids average approximately 500 bbl/well, and drill cuttings would comprise the equivalent of approximately 600 tons/well of dry rock. Thus, under the proposed action, up to 6,000 bbl of drilling fluids and up to 7,200 tons of drill cuttings could be disposed of in the waters of the Cook Inlet Planning Area. All drilling muds and cuttings associated with development and production wells would be treated and reinjected into the well. Discharge of drilling muds and cuttings would increase turbidity in the vicinity of the well. The discharge would contain trace metal and hydrocarbon constituents that would be suspended in the water column and subsequently deposited on the seafloor. These drilling discharges must comply with NPDES permit requirements regarding the discharge amount, rate, and toxicity, which would greatly reduce the impact to water quality.

Because all produced water would be discharged down hole, there would be no impacts on water quality from these operational discharges. Domestic wastewater would also be generated by these activities. This material would be injected into a disposal well. Solid wastes, including scrap metal, would be hauled offsite for disposal at an approved facility.

The OCS service and construction vessel traffic to and from platform sites within the planning area (up to nine vessel trips per week) would also affect quality through the permitted release of operational wastes. Routine vessel-associated discharges that could affect coastal water quality include sanitary wastes and bilge water. Bilge water discharges from support vessels could contain petroleum and metals from machinery. Bilge water and sanitary discharges to larger coastal water channels would produce local and temporary effects because of the large volume of water available to dilute the discharges and the presence of currents that would promote mixing. However, in confined portions of some channels, there might be insufficient water volume or currents for mixing and dilution. In such regions, water quality could be degraded. Compliance with applicable NPDES permits and USCG regulations would prevent or minimize most impacts on receiving waters. Discharges in coastal areas are regulated by State-issued or Federal NPDES permits specifically for coastal areas.

The National Research Council (2003b) estimated that the total amount of produced water being released into Cook Inlet waters was 45.7 million bbl/yr in the 1990s. Produced water can contain hydrocarbons, salts, and metals at levels toxic to marine organisms. Before being discharged into the ocean, produced water is typically treated and must meet NPDES requirements regarding discharge rate, contaminant concentration, and toxicity, thereby reducing

the potential for sediment contamination. However, under the current NPDES permits, new facilities would not be allowed to discharge produced water into Cook Inlet. Under the proposed action, it is anticipated that all produced waters would be treated and reinjected into the well. Therefore, no impacts on water quality are expected to result from produced water.

Marine Waters. Routine operations that could affect marine water quality in the Cook Inlet Planning Area include anchoring, mooring, drilling and well completion activities, well testing and cleanup operations, flaring/burning, facility installation and operations, support service activities, decommissioning, and site clearance. These activities would disturb the seafloor and increase the suspended sediment load in the water column. Offshore pipelines in Alaska are normally placed in a dredged trench in waters less than about 60 m (197 ft) deep. Dredged material from the trenches can be used to cover the pipeline. Fill deposited during artificial island construction also increases turbidity. As these operations are reversed and structures removed, increased turbidity would reoccur. In general, plumes from these activities extend a few hundred meters to a few kilometers down current, but the length of the plume would depend on rate and duration of discharge, sediment grain size, current regime, source type, water column turbulence, and season. The direction of plume movement would be influenced by the general circulation pattern in the planning area and local ambient conditions. Suspended sediments in the plumes are expected to have toxicity ranges that are generally described as nontoxic to slightly toxic (National Academy of Sciences 1983). Overall, it is anticipated that the impacts on water quality from routine operations would be localized and temporary. As with coastal water impacts, dilution, settling, and rapid flushing would minimize any long-lasting impacts on water quality.

Adverse water quality impacts would also be produced by routine discharges of domestic waste (e.g., wash water, sewage, and galley wastes) and deck drainage (platform and deck washings, and gutters and drains, including drip pans and work areas). Domestic waste would increase suspended solids in the receiving water, thereby increasing turbidity and biological oxygen demand. Sanitary and domestic wastes are monitored in accordance with the NPDES permit. Established effluent limitations and guidelines published in 40 CFR Part 435, and operator compliance should minimize impacts on ambient water quality. Such impacts would be local and temporary.

The principal discharges of concern during drilling would be muds and cuttings. Drilling muds and cuttings generated when installing exploration and delineation wells would be discharged at the well site. All drilling muds and cuttings associated with development and production wells would be treated and reinjected into the well. See the discussion above for coastal waters for further information on potential impacts of discharging drilling muds and cuttings.

During operations, all produced water would be reinjected into the well in the Cook Inlet Planning Area, there produced water generated from activities associated with the proposed action would have no impacts on marine water quality.

As with coastal waters, OCS vessels traveling to and from platform sites within the planning area (up to three vessel trips per week per platform) could affect local water quality as a

result of operational discharge of waste fluids. Because of dilution, settling, and flushing, water quality impacts from such discharges would be localized and temporary.

4.4.3.2.2 Accidents.

Coastal Waters. Accidental releases could affect the quality of coastal water in the Cook Inlet. The magnitude and severity of impacts would depend on the spill location and size, type of product spilled, weather conditions, and the water quality and environmental conditions at the time of the spill.

Under the proposed action, the number and types of spills assumed to occur in the Cook Inlet Planning Area include up to one large spill (i.e., ≥1,000 bbl) from either a platform (5,100 bbl) or a pipeline (1,700 bbl), up to three small spills with volumes between 50 and 999 bbl; and up to 15 very small spills with volumes between 1 and 50 bbl (Table 4.4.2-1). For conservative analysis (i.e., one in which impacts would be greater than those that would actually occur), all the spills are assumed to occur in Cook Inlet coastal waters. Such spills would adversely affect water quality. A spill in isolated coastal waters, in shallow waters under thick ice, or in rapidly freezing ice could cause sustained degradation of water quality to levels that are above State or Federal criteria for hydrocarbon contamination. Concentrations could exceed the chronic criterion of 0.015 ppm total hydrocarbons, but this exceedance would probably occur over a relatively small area. Persistent small spills in such areas could result in local chronic contamination. In most cases, spills would be rapidly diluted. In some cases, however, water quality could be degraded to a greater extent.

Weathering processes that transform the oil, such as volatilization, emulsification, dissolution, chemical oxidation, photo-oxidation, and microbial oxidation, may reduce impacts of oil spills on coastal water quality in the Cook Inlet Planning Area (NRC 2003b; NOAA 2005). Dissolution, which is a small component of weathering, can be important to biological communities because the most soluble fractions are often the most toxic (Shen and Yapa 1988). Because oil is generally less dense than water, it would tend to float on the sea surface. Lighter oil fractions such as BTEX would readily evaporate from the surface and, therefore, would not be a continuing source of potential water contamination. Following a spill, light crude oils can lose as much as 75% of their initial volume to evaporation as the lighter components (e.g., BTEX) change from liquid to gas phase; medium-weight crude oils can lose as much as 40% (NRC 2003b).

Spills would tend to move in directions consistent with established circulation patterns for the planning area (i.e., northward along the Kenai Peninsula and southward along the Alaska Peninsula). Actual flow paths would be affected by winds, tides, ice cover, temperature, and cleanup activities.

If a large spill were to happen near port, there could be adverse impacts on coastal waters. In such a low-energy environment (i.e., an environment in which there is limited wave and current activity), the oil would not be easily dispersed, and weathering could be slower than it would be in the open sea. Effects on water quality could persist if oil reached coastal wetlands

and was deposited in fine sediments, becoming a long-term source of pollution because of remobilization. In such locations, spill cleanup might be necessary for the recovery of the affected areas. Potential impacts to water quality from spill cleanup activities are discussed below.

Small oil spills (<1,000 bbl) or very small oil spills (<50 bbl) would produce small but measurable impacts on water quality. Assuming that all intermediately sized and small spills would not occur at the same time and place, water quality would rapidly recover without mitigation because of mixing, dilution, and weathering.

Under arctic conditions (i.e., cold water and cold air temperatures), weathering processes, such as volatilization, would also be much slower than in warmer climates (MMS 2008b); under calm conditions and cold temperatures in restricted waters, vertical mixing and dissolution would be reduced (MMS 2008b). If the spill were to occur on ice or under ice, oil would be trapped and essentially remain unchanged until breakup occurred and the ice began to melt. The volatile compounds from such a spill would be more likely to freeze into the ice within hours to days rather than dissolve or disperse into the water below the ice. A hydrocarbon plume in the water column underneath the ice could persist with concentrations that exceed ambient standards and background levels for a distance greater than that in the open sea (MMS 2008b). Impacts on coastal waters from a large spill would depend on the season, type, and composition of the spill, weather conditions, and size of the spill.

Marine Waters. Accidental hydrocarbon releases in the marine environment can occur at the surface from tankers or platforms or at the seafloor from the wellhead or pipelines. The number of potential spills estimated for Cook Inlet marine waters are conservatively assumed to be the same as those discussed above for coastal waters. In general, oil spilled below the surface rises rapidly as droplets that coalesce to form a slick. Standard response procedures for a spill could then be used. In open marine waters, evaporation, advection, and dispersion generally reduce the effects of toxic oil fractions and their degradation products to below State and Federal criteria for hydrocarbon contamination. Sustained degradation of water quality to levels exceeding the chronic criterion of 0.015 ppm total hydrocarbon contamination is unlikely. However, levels could exceed this standard over several thousand square kilometers for a short period of time (about 30 days), depending on the size, location, and season of the spill. Marine spills would tend to move in directions consistent with established circulation patterns for the planning area (i.e., northward along the Kenai Peninsula and southward along the Alaska Peninsula). Actual flow paths would be affected by winds, tides, ice cover, temperature, and cleanup activities. The persistence of oil slicks would generally last less than 1 year. Large oil spills assumed under this alternative would become more likely as the volume of assumed oil production increases. Water quality would eventually recover, but recovery time could be decreased by oil-spill cleanup activities.

Spill Response and Cleanup. Spill response and cleanup activities in both coastal and marine waters could include, depending on location, use of chemical dispersants, *in situ* burning, use of vessels and skimmers, drilling of a relief well, and beach cleaning and booming (BOEMRE 2011k). Potential impacts to water quality from each of these spill response and cleanup activities are discussed above in Section 4.4.3.1.2. However, clean up of large spills in

the open sea off of south central Alaska could be hindered by several factors. There could be limited access to oil slicks contained between ice floes during a large part of the year. There could also be reduced oil flow into recovery devices because of increased viscosity and precipitation of wax crystals, as well as decreased oil adhesion to the recovery unit material and a high percentage of free water in the recovered product due to mixing of the oil slick with slash ice and snow (MMS 2008b). In winter, icebreakers could affect the movement of spilled oil that may be trapped beneath or in the ice (BOEMRE 2011k).

If an oil spill occurred in winter, *in situ* burning would be limited by the lack of open water to collect oil and open water in which to burn it. If burning could occur in winter on a limited scale, sea ice would melt in the immediate vicinity of the burn.

Catastrophic Discharge Event. For the Cook Inlet Planning Area, a low-probability CDE could have a volume of between 75,000 and 125,000 bbl (Table 4.4.2-2). A catastrophic discharge event in coastal or marine water could present sustained degradation of water quality from hydrocarbon contamination in exceedence of State and Federal water and sediment quality criteria. These effects could be significant depending upon the duration and area impacted by the spill. Additional effects on water quality could occur from response and cleanup vessels, *in situ* burning of oil, dispersant use, discharges and seafloor disturbance from relief well drilling, and activities on shorelines associated with cleanup, booming, beach cleaning, and monitoring. Impacts from the spill would again depend on the spill size and composition, weather conditions, and the location of the spill.

4.4.3.3 Alaska – Arctic

This section analyzes impacts on coastal and marine waters in the Arctic region. Coastal waters, as defined here, include the bays and estuaries along the coast and State waters extending out to the inward boundary of the territorial seas. Marine waters extend from this boundary out to a water depth of 200 m (656 ft).

Table 4.1.1-1 details impacting factors associated with oil and gas activities and the development phase in which they can occur. The following factors affecting water quality have been identified: disturbance of bottom sediments, wastes and disposal, vessel traffic, and accidental spills. The water quality stressor activities associated with oil and gas development are shown in Table 4.4.3-1.

The current Arctic NPDES General Permit for wastewater discharges from Arctic oil and gas exploration (No. AKG-33-0000) expired on June 26, 2011. USEPA will reissue separate NPDES exploration General Permits for the Beaufort Sea and the Chukchi Sea prior to the 2012 drilling season. USEPA expects that tribal consultation and public comment on the new proposed Arctic oil and gas exploration permits would occur in fall 2011. The USEPA Region 10 website will post updates to its website as they become available at http://yosemite.epa.gov/r10/water.nsf/npdes+permits/arctic-gp.

Common impacts on water quality in both coastal and marine areas include those from vessel traffic, well drilling, and operational discharges. The types of impacts expected are the same as those discussed above in Section 4.4.3.1.

4.4.3.3.1 Routine Operations.

Coastal Waters. Construction and installation of exploratory wells (up to 16 in the Beaufort Sea Planning Area and up to 20 in the Chukchi Sea Planning Area), development wells (up to 120 in the Beaufort Sea Planning Area and up to 280 in the Chukchi Sea Planning Area), subsea production wells (up to 10 in the Beaufort Sea Planning Area and up to 82 in the Chukchi Sea Planning Area), platforms (up to 4 in the Beaufort Sea Planning Area and up to 5 in the Chukchi Sea Planning Area), and offshore pipelines (up to 249 km [155 mi] in the Beaufort Sea Planning Area and up to 402 km [250 mi] in the Chukchi) would affect water quality. Such activities would disturb bottom sediments and increase the turbidity of the water in the area of the construction. Because pipelines in shallow waters are buried using a trenching method, installation would initially release sediment to the water column. Moderate impacts on water quality (i.e., turbidity) from such construction and installation activities would occur in the immediate area of the activity. These impacts would be local and short term as settling and mixing occurred.

Drilling muds and cuttings generated when installing exploration and delineation wells would be discharged at the well site. All drilling muds and cuttings associated with development and production wells would be treated and reinjected into the well. For exploration wells, the volume of drilling fluids and cutting vary depending upon the well characteristics, but, in general, fluids average approximately 500 bbl/well and drill cuttings would comprise the equivalent of approximately 600 tons/well of dry rock. Thus, under the proposed action, up to 8,000 bbl of drilling fluids and up to 9,600 tons of drill cuttings could be disposed of in the waters of the Beaufort Sea Planning Area and up to 10,000 bbl of drilling fluids and up to 12,000 tons of drill cuttings could be disposed of in the waters of the Chukchi Sea Planning Area. Discharge of drilling muds and cuttings would increase turbidity in the vicinity of the well. The discharge would contain trace metal and hydrocarbon constituents that would be suspended in the water column and subsequently deposited on the sea floor. These drilling discharges must comply with NPDES permit requirements regarding the discharge amount, rate, and toxicity, which would greatly reduce the impact to water quality.

Because of climatic conditions in the Arctic region, there would be a number of additional operations specific to the Arctic (e.g., constructing and maintaining ice roads [MMS 2002c] and ice islands). In addition to affecting the turbidity of coastal waters in the Arctic region, construction activities would also produce waste materials. Contaminants would also be released to the coastal waters during every ice breakup from fluids entrained in ice roads and ice islands (Skolnik and Holleyman 2005). Entrained contaminants from vehicle exhaust, grease, antifreeze, oil, and other vehicle-related fluids would pass directly into the sea at each breakup (MMS 2002c). These discharges are not expected to be major; however, they would occur throughout the life of a development area.

Construction of new onshore pipelines (up to 129 km [80 mi] in the Beaufort Sea Planning Area and none in the Chukchi Sea Planning Area) would also affect coastal water quality in the Arctic region. Proper siting of facilities and requirements associated with construction permits would largely mitigate these impacts. The impacts on water quality would range from negligible to minor, depending on site location and construction and mitigation activities.

The OCS service and construction vessel traffic to and from platform sites within the planning area (up to 12 vessel trips per week in the Beaufort Sea Planning Area and up to 15 vessel trips per week in the Chukchi Sea Planning Area) would also affect water quality through the permitted release of operational wastes. Compliance with applicable NPDES permits and USCG regulations would prevent or minimize most impacts on receiving waters.

Marine Waters. Routine operations that could affect marine water quality in the Arctic region include anchoring, mooring, drilling and well completion activities, well testing and cleanup operations, flaring/burning, facility installation and operations, support service activities, decommissioning, and site clearance. Activities such as dredging trenches for pipelines and constructing artificial islands would disturb the seafloor and increase the suspended sediment load in the water column. These suspended sediments have toxicity ranges that are generally described as nontoxic to slightly toxic (National Academy of Sciences 1983). Turbidity and plumes containing sediments would depend on the season, sediment grain size, the rate and duration of discharge within the disturbed areas, and the currents present. This additional suspended sediment load would be temporary, and impacts on water quality would be localized.

The majority of wastes generated during construction and development would consist of drill cuttings and spent muds (MMS 2002c). Drilling muds and cuttings generated when installing exploration and delineation wells would be discharged at the well site. All drilling muds and cuttings associated with development and production wells would be treated and reinjected into the well. Some waste also would be generated during operations from well-workover rigs. Domestic wastewater and produced waters generated by these activities would also be injected into the disposal well. Solid wastes, including scrap metal, would be hauled offsite for disposal at an approved facility. Impacts on water quality from these activities would be negligible.

Turbidity on a smaller scale would also result from retrieving anchors used to control the movement of vessels while dredging and setting pipes or placing platforms. These types of disturbances would not occur if drillships, which use dynamic positioning rather than anchors, were used, a standard procedure in Chukchi Sea exploration.

The OCS service and construction vessel traffic to and from platform sites within the planning area (up to 12 vessel trips per week in the Beaufort Sea Planning Area and up to 15 vessel trips per week in the Chukchi Sea Planning Area) would also affect water quality through the permitted release of operational wastes. Compliance with applicable NPDES permits and USCG regulations would prevent or minimize most impacts on receiving waters.

4.4.3.3.2 Accidents.

Coastal Waters. Accidental releases could affect the quality of coastal water in the Arctic region. The magnitude and severity of impacts would depend on the location of the spill, spill size, type of product spilled, weather conditions, and the water quality and environmental conditions at the time of the spill. Under the proposed action, the number and types of spills assumed to occur in the Arctic region include up to three large spills (i.e., ≥1,000 bbl): up to two spills at a volume of 1,700 bbl from pipelines and up to one spill at a volume of 5,000 bbl from a platform. Between 10 and 35 small spills with volumes between 50 and 999 bbl are assumed to occur and between 50 and 190 very small spills with volumes between 1 and 50 bbl (Table 4.4.2-1).

If a large spill were to occur in enclosed coastal waters or were driven by winds, tides, and currents into a semi-enclosed coastal area, water quality would be adversely affected. With limited wave and current activity in coastal waters, the oil would not be easily dispersed, and weathering could be slower than in the open sea (see discussion in Section 4.4.3.1.2). Under arctic conditions (i.e., cold water and cold air temperatures), weathering processes, such as volatilization, would also be much slower than in warmer climates (MMS 2008b); under calm conditions and cold temperatures in restricted waters, vertical mixing and dissolution would be reduced (MMS 2008b). If the spill were to occur on ice or under ice, oil would be trapped and essentially remain unchanged until breakup occurred and the ice began to melt. The volatile compounds from such a spill would be more likely to freeze into the ice within hours to days rather than dissolve or disperse into the water below the ice. A hydrocarbon plume in the water column underneath the ice could persist with concentrations that exceed ambient standards and background levels for a distance greater than that in the open sea (MMS 2008b). Impacts on coastal waters from a large spill would depend on the season, type and composition of the spill, weather conditions, and size of the spill.

Effects on water quality could persist even longer if oil were to reach coastal wetlands and be deposited in fine sediments, becoming a long-term source of pollution because of remobilization. In such locations, spill cleanup could be necessary for recovery of the affected areas. Shoreline cleanup operations could involve crews working with sorbents, hand tools, and heavy equipment. The magnitude and severity of impacts from such spills would depend on the nature of the coastal area associated with the spill, the spill size and composition, and the water quality and condition of resources affected by the spill.

Cleanup of large spills in the open sea could be hindered by several factors. There could be limited access to oil slicks contained between ice floes during a large part of the year. There could also be reduced oil flow into recovery devices because of increased viscosity and precipitation of wax crystals, as well as decreased oil adhesion to the recovery unit material and a high percentage of free water in the recovered product due to mixing of the oil slick with slash ice and snow (MMS 2008b). Impacts from the spill would again depend on the spill size and composition, weather conditions, and the location of the spill.

Small oil spills (<1,000 bbl) or very small oil spills (<50 bbl) would produce measurable impacts on water quality. Based on the assumption that all small and very small spills do not

occur at the same time and place, water quality would rapidly recover without mitigation, due to mixing, dilution, and weathering.

Marine Waters. Under arctic conditions (i.e., cold water and air temperatures), weathering processes would be much slower than in warmer climates (MMS 2008b). Seasonality and the specific spill location would cause variability in effects (e.g., summer versus winter in the Beaufort and Chukchi Seas). If a spill were to occur, oil would be trapped and essentially remain unchanged until breakup occurred and the ice began to melt. The volatile compounds from such a spill would be more likely to freeze into the ice within hours to days rather than dissolve or disperse into the water below the ice. A hydrocarbon plume in the water column underneath the ice could persist with concentrations that are above ambient standards and background levels for a distance that would be five times greater than that in the open sea (MMS 2008b).

Small oil spills (<1,000 bbl) or very small oil spills (<50 bbl) would have measurable impacts on water quality. If it is assumed that all small and very small spills would not occur at the same time and place, water quality would rapidly recover without mitigation because of mixing, dilution, and weathering.

Spill Response and Cleanup. Spill response and cleanup activities in both coastal and marine waters could include, depending on location, use of chemical dispersants, *in situ* burning, use of vessels and skimmers, drilling of a relief well, and beach cleaning and booming (BOEMRE 2011k). Potential impacts to water quality from each of these spill response and cleanup activities are discussed above in Section 4.4.3.1.2. However, cleanup of large spills in the open sea within the Beaufort and Chukchi Seas could be hindered by several factors. There could be limited access to oil slicks contained between ice floes during a large part of the year. There could also be reduced oil flow into recovery devices because of increased viscosity and precipitation of wax crystals, as well as decreased oil adhesion to the recovery unit material and a high percentage of free water in the recovered product due to mixing of the oil slick with slash ice and snow (MMS 2008b). In winter, icebreakers could affect the movement of spilled oil that may be trapped beneath or in the ice (BOEMRE 2011k).

If an oil spill occurred in winter, *in situ* burning would be limited by the lack of open water to collect oil and open water in which to burn it. If burning could occur in winter on a limited scale, sea ice would melt in the immediate vicinity of the burn.

Catastrophic Discharge Event. For the Chukchi Sea Planning Area, a low-probability CDE could have a volume of between 1,400,000 and 2,200,000 bbl (Table 4.4.2-2). For the Beaufort Sea Planning Area, a catastrophic discharge event could have a volume of between 1,700,000 and 3,900,000 bbl (Table 4.4.2-2). A catastrophic discharge event in either coastal or marine waters could present sustained degradation of water quality from hydrocarbon contamination in exceedence of State and Federal water and sediment quality criteria. These effects could be significant depending upon the duration and area impacted by the spill. Additional effects on water quality could occur from response and cleanup vessels, *in situ* burning of oil, dispersant use, discharges and seafloor disturbance from relief well drilling, and activities on shorelines associated with cleanup, booming, beach cleaning, and monitoring.

Impacts from the event would again depend on the spill size and composition, weather conditions, and the location of the spill.

4.4.3.4 Conclusions

Overall coastal and marine water quality impacts due to routine operations and operational discharges under the proposed action would be unavoidable. Compliance with NPDES permit requirements would reduce or prevent most impacts on receiving waters caused by discharges from normal operations. Water quality would recover when discharges ceased because of dilution, settling, and mixing. Impacts on water quality from routine operations associated with the Program are expected to be minor to moderate.

Oil spills could reduce water quality, and these impacts would be unavoidable. In the presence of cold temperatures and ice, cleanup activities could be more difficult than in more temperate environments. The magnitude of the impacts would depend on the specific location affected and the nature and magnitude of the activity/accident. Small spills would be expected to result in short-term, temporary impacts on coastal and marine water quality. A large spill in coastal waters could result in longer term impacts on water quality, but cleanup efforts would reduce the likelihood of permanent impairment. A large spill in marine waters would be expected to have temporary impacts on water quality; however, cleanup efforts and evaporation, dilution, and dispersion would minimize the long-term impacts.

A catastrophic discharge event could present sustained degradation of water quality from hydrocarbon contamination in exceedence of State and Federal water and sediment quality criteria. These effects would be significant depending upon the duration and area impacted by the spill. Impacts from the event would again depend on the spill size and composition, weather conditions, and the location of the spill.

4.4.4 Potential Impacts on Air Quality

4.4.4.1 Gulf of Mexico

In the GOM west of 87.5° W longitude, OCS air emissions are regulated by BOEM according to 30 CFR 250.302-304. BOEM reviews projected air emissions information from an operator submitting a plan for exploration or development activities. If the projected annual emissions exceed a certain threshold, which is determined by the distance from shore, the operator needs to perform a modeling analysis to assess air quality impacts on onshore areas. If the modeled concentrations exceed defined significance levels in an attainment area, which is an area that meets the National Ambient Air Quality Standards (NAAQS), best available control technology would be required on the facility. If the affected area is classified nonattainment, further emission reductions or offsets may be required. Projected contributions to onshore pollutant concentrations are also subject to the same limits that the USEPA applies to the onshore areas under its Prevention of Significant Deterioration (PSD) program (MMS 2007c).

Facilities located east of 87.5° W longitude would be under the USEPA jurisdiction, which regulates air emissions as prescribed in 40 CFR Part 55. For facilities located within 40 km (25 mi) of a State's seaward boundary, the regulations are the same as would be applicable if the emission source were located in the corresponding onshore area and would include State and local requirements for emission controls, emission limitations, offsets, permitting, testing, and monitoring. For facilities located beyond 40 km (25 mi) of a State's seaward boundary, the basic Federal air quality regulations apply, which include the USEPA emission standards for new sources, the PSD regulations, and Title V permits. Both PSD and Title V requirements apply to major sources that, depending on the source type, could potentially emit more than either 100 tpy or 250 tpy of a criteria pollutant. Which threshold applies to a particular source, how the potential emissions are calculated, and what controls are required if the applicable threshold is exceeded are all issues determined in discussions with regulators during the air permit application and approval process (MMS 2007c).

The USEPA has established NAAQS for six criteria pollutants — nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter (PM; PM_{10}, PM with an aerodynamic diameter of 10 μm or less; and $PM_{2.5}$, PM with an aerodynamic diameter of 2.5 μm or less), carbon monoxide (CO), lead (Pb), and ozone (O_3) — because of their potential adverse effects on human health and welfare. The health and environmental effects of air pollutants have been summarized by the USEPA (USEPA 2011a). Ambient levels of criteria pollutants except Pb can contribute to respiratory illnesses, especially in persons with asthma, children, and the elderly, and PM and CO can also aggravate cardiovascular diseases.

Ozone Formation. O_3 in the atmosphere is formed by photochemical reactions involving primarily nitrogen oxides (NO_x) and volatile organic compounds (VOCs). It is formed most readily in the summer season, with high temperatures, lower wind speeds, intense solar radiation, and an absence of precipitation; high O_3 episodes are typically associated with slow-moving, high-pressure systems characterized by light winds and a shallow boundary layer (NRC 1992). O_3 can irritate the respiratory system, reduce lung function, and aggravate asthma. Repeated exposure to O_3 pollution for several months may cause permanent lung damage. Children, adults who are active outdoors, and people with respiratory problems are the most at risk from high O_3. High levels of O_3 are also accompanied by a mix of organic radicals, which also causes adverse health effects. O_3 interferes with the ability of plants to produce and store food, which makes them more susceptible to disease, insects, other pollutants, competition, and harsh weather. It may also cause damage to the leaves of trees and other plants, thereby affecting the health and appearance of vegetation in cities, National Parks, and recreation areas. O_3 may reduce forest growth and crop yields, potentially affecting species diversity in ecosystems (USEPA 2011a).

Acid Deposition and Visibility. Gaseous pollutants undergo various chemical reactions in the atmosphere to form small particles, which remain airborne for extended periods of time. NO_x compounds react with ammonia and moisture to form ammonium nitrate particles, which contribute to $PM_{2.5}$ concentrations. SO_2 combines with moisture to form tiny sulfate particles, which may also contribute to adverse health effects. In addition, gaseous NO_x and SO_2 can dissolve into cloud water. These acidic chemicals eventually return to the ground in either wet (e.g., rain, snow) or dry (e.g., gases, particles) forms, commonly referred to as acid deposition or

acid rain (USEPA 2011b). Dry deposition is equally as important as wet deposition. The deposition often takes place hundreds of kilometers from the source. Acid deposition can damage forests and crops, change the makeup of soil, and may, in some cases, make lakes and streams acidic and unsuitable for fish. Deposition of nitrogen from NO_x emissions also contributes to nitrogen load in water bodies, especially estuaries and near-coastal ecosystems. Acid deposition accelerates the decay of building materials and paints, including irreplaceable monuments, statues, sculptures, and other cultural resources. Particulate matter, including sulfate and nitrate particles and organic aerosols that form part of photochemical smog, significantly reduce atmospheric visibility in areas including National Parks, Monuments, and Wilderness Areas (USEPA 2011b).

In general, the most important source of visibility degradation is from $PM_{2.5}$ in the 0.1 to 1 μm size range, which covers the range of visible light (0.4–0.7 μm) (Malm 1999). These particles are directly emitted into the atmosphere through fuel burning. However, other sources arise through chemical transformation of NO_2, SO_2, and VOCs into nitrates, sulfates, and carbonaceous particles. Existing visibility in the eastern United States, including the GOM States, is impaired due to $PM_{2.5}$ containing primarily sulfates and carbonaceous material. High relative humidity (over 70%) can play an important factor in visibility impairment, especially in the GOM coastal areas, where relative humidity is higher than 70% throughout the year. These particles are generally hygroscopic, and thus the absorption of water by the particulate matter makes them grow to a size that enhances their ability to scatter light and hence aggravates visibility reduction. Over the open waters of the GOM, a study of visibility from platforms off Louisiana revealed that significant reductions in Louisiana coastal and offshore visibility are almost entirely due to transient natural occurrences of fog (Hsu and Blanchard 2005). Episodes of haze are short-lived and affect visibility much less. Offshore haze can result from plume drift generated from coastal sources (MMS 2007c).

4.4.4.1.1 Routine Operations.

Under the proposed action, construction and operation of up to 2,100 exploration and delineation wells, up to 2,600 development and production wells, and up to 12,100 km (7,500 mi) of new pipeline as well as up to 12 new pipeline landfalls, up to 6 new pipe yards, and up to 12 new natural gas processing facilities and the removal of up to 275 platforms with explosives will result in emissions that could affect air quality in the GOM. These activities would generate emissions from stationary sources at the drilling/well sites and from support vessels and aircraft over the 40- to 50-year period of the Program (Table 4.4.1-1). There could be up to 600 vessel trips/wk and 5,500 helicopter trips/wk under the proposed action.

Emissions. The type and relative amounts of air pollutants generated by offshore operations vary according to the phase of activity. There are three principal phases of oil and gas activities operations: exploration, development, and production. Activities affecting air quality include seismic surveys, drilling activities, platform construction and emplacement, pipeline laying and burial operations, platform operations, flaring, fugitive emissions, support vessel and helicopter operations, and evaporation of VOCs during transfers and spills. Principal emissions

TABLE 4.4.4-1 Estimated Highest Annual Air Emissions from OCS Activities in the Gulf of Mexico Planning Areas, Proposed 2012-2017 Leasing Program

	Pollutant (tons/yr)					
Activity	NO_X	SO_x	PM_{10}	$PM_{2.5}$	VOC	CO
Exploration/Delineation Well Drilling	15,359–29,403[a]	1,956–3,745	271–518	267–511	364–696	3,662–7,002
Development/Production Well Drilling	8,190–15,529	1,043–1,978	144–274	142–270	194–368	1,952–3,698
Platform Installation and Removal	540–998	77–142	18–21	18–23	18–23	98–129
Pipeline Installation	3,180–9,939	540–1,688	120–375	120–375	120–375	660–2,063
Production Platforms	11,634–21,887	284–535	108–204	107–202	7,432–13,981	13,031–24,514
Support Vessels	20,943–39,400	2,822–5,309	363–682	363–682	363–682	1,995–3,753
Helicopters	173–325	43–80	34–63	34–63	417–785	2,112–3,973
Tankers Loading	0–326	0–55	0–12	0–12	0–2,456	0–68
Tankers in Transit	0–7,035	0–853	0–107	0–107	0–2,164	0–586
Tankers Unloading	0–326	0–55	0–12	0–12	0–1,162	0–68
Total	60,019–125,167	6,765–14,440	1,058–2,268	1,051–2,257	8,907–22,692	23,510–45,853

[a] The range of values reflects the low and high end of the exploration and development scenarios for the Program.

Source: Herkhof 2011; Wilson et al. 2010.

of concern are the criteria pollutants and their precursors: NO_x, sulfur oxides (SOx),[13] PM_{10} and $PM_{2.5}$, CO, and VOC. Releases of toxic chemicals could be a concern around oil spills and *in situ* burning and especially during accidental releases of hydrogen sulfide (H_2S) at platforms.

Wilson et al. (2010) provided a comprehensive emission inventory of oil and gas activities in the GOM for the year 2008, showing that support vessels and platforms rank first and second, respectively, as NO_x emitters with natural gas engines being the largest source on platforms. Support vessels are the largest SO_x emitters, while the drilling rigs also emit significant SO_x. Albeit small, the primary SO_x sources on platforms are diesel engines used in drilling. The largest sources of PM_{10} are support vessels, drilling rigs, and production platforms. VOCs come mostly from production platforms, where the primary sources are cold vents, followed by fugitive sources. Fugitive sources include oil and gas processing, pump and compressor seals, valves, connectors, and storage tanks. Natural gas engines on platforms account a considerable portion of CO emissions (Wilson et al. 2010).

Air emissions from the proposed action were estimated using the most recently available exploration and development scenario for 2012-2017, as shown in Table 4.4.4-1. These emissions were estimated by BOEM (Herkhof 2011) using emission factors from the *2008 Gulfwide Emission Inventory Study* (Wilson et al. 2010).

In terms of absolute amounts, the largest emissions would be NO_x followed by CO, with lesser amounts of VOC, SO_x, PM_{10}, and $PM_{2.5}$ in order of descending emissions. Under both the high and low scenarios, support vessels would be the largest source of NO_x, SO_x, PM_{10}, and $PM_{2.5}$ and production platforms would be the largest source of VOC and CO. Emissions from the Program would initially be lower in the first few years as exploratory wells were drilled and platforms started producing oil and gas. During the last half of the Program, emissions would decrease as production decreased and some platforms were removed (MMS 2007c).

It is estimated that about 10% of the crude oil produced in deep water in the GOM would be transported to shore via tanker, while in shallow waters about 1% of production would be transported by barge. The transport of crude oil would result in VOC emissions from loading operations and breathing losses during transit. VOC emissions would also occur during unloading and ballasting in port. There would also be emissions of NO_x, SO_2, and PM_{10} from the ships' engines (MMS 2007c).

Impacts on Criteria Pollutants Other Than Ozone. BOEM performed a cumulative air quality modeling analysis of platform emissions in a portion of the GOM in 1992 (MMS 1997b). The area modeled included most of the coastline of Louisiana and extended eastward to include coastal Mississippi and Alabama. Facility emissions were obtained from the emissions inventory used in the GOM air quality study (MMS 1995b). The emission values were multiplied by a factor of 1.4 to account for growth. The modeled onshore annual average NO_2 concentrations were generally somewhat greater than 1 microgram per cubic meter ($\mu g/m^3$). The highest values appeared in the Mississippi River Delta region, where a maximum

[13] Sulfur dioxide (SO_2) belongs to the family of sulfur oxides (SO_x). For emissions, SO_2 accounts for most of SO_x, and thus these are used interchangeably.

concentration of 6 μg/m^3 was calculated, which is 6% of the national standard for NO_2. The highest predicted annual, maximum 24-hr, and maximum 3-hr average SO_2 concentrations were 1.1, 13, and 98 μg/m^3, respectively. These values are 1, 4, and 7% of the NAAQS for the respective averaging periods. Modeling was not performed for PM_{10} or $PM_{2.5}$, but the concentrations would be lower because of lower emission rates. The projected emissions for the proposed action would be lower than the emissions used in the modeling and scattered further offshore; thus, the impacts would be correspondingly lower. Existing concentrations of NO_2, SO_2, PM_{10}, and $PM_{2.5}$ in the GOM coast States are well within the NAAQS, so emissions from the proposed action would not result in any exceedance of the NAAQS.

The highest predicted NO_2 and SO_2 concentrations in the 1992 emissions modeling were well within the maximum allowable PSD Class II increments for those pollutants. Any concentrations resulting from the emissions associated with the proposed action should also be within the PSD Class II increments.

The maximum allowable increase for the annual average NO_2 concentration in the Class I Breton National Wilderness Area (NWA) is 2.5 μg/m^3. The highest predicted annual average NO_2 concentration in Breton from the year 1992 emission sources was 3.6 μg/m^3, which exceeds the Class I increment and indicates that the question of increment consumption at Breton NWA could be of concern (MMS 2007c, 1997b).

The highest predicted SO_2 concentrations in Breton NWA were 0.3, 4.5, and 9.7 μg/m^3 for the annual, maximum 24-hr average, and maximum 3-hr average concentrations, respectively. The maximum allowable concentration increases for PSD Class I areas are 2.0, 5.0, and 25 μg/m^3, respectively. Based on this result, SO_2 concentrations from the proposed action would be within the Class I maximum allowable increases (MMS 1997b, 2007c).

Comparing Impacts to PSD Increments

Several points should be considered when air quality impacts are compared to PSD increments. First, the PSD program applies to individual sources, not programs. Emissions from an individual source such as a platform or set of platforms could differ from the emissions being modeled in a particular study. Second, increment tracking is a cumulative process that sets a maximum allowable increase above a baseline concentration. It is unlikely that a permitting agency would permit a single source to consume all of the increment. Last, PSD applies only to major sources, generally sources with the potential to emit more than 250 tons/yr, except for the 100 tons/yr threshold for 28 source categories. OCS oil and gas production activities are subject to a 250 tons/yr threshold. Regardless of the *actual* emissions, a source's *potential* emissions could exceed the 250 tons/yr threshold. Determining potential emissions and available PSD increment allowances requires consultation with the cognizant regulators.

Because of continuing concern about the combined impact of offshore and onshore emission sources on the PSD Class I increments in Breton NWA, BOEMRE has collected an emission inventory for OCS facilities located within 100 km (62 mi) of the Breton Class I area. A modeling study (2000–2001) to the baseline years (1977 for SO_2 and 1988 for NO_2) revealed that none of the allowable SO_2 or NO_2 increments had been fully consumed (Wheeler et al. 2008). The maximum annual, 24-hr, and 3-hr SO_2 increments consumed with the Breton NWA were –1.07, 1.18, and 1.80 μg/m^3, respectively. A decrease in annual SO_2 concentration resulted from a general

decrease in SO_2 emissions from onshore and offshore sources since 1977. The maximum allowable concentration increases for PSD Class I areas are 2.0, 5.0, and 25 μg/m^3, respectively. The maximum annual NO_2 increment consumed within the Breton NWA was 0.10 μg/m^3, for which the maximum allowable NO_2 increment is 2.5 μg/m^3. In addition, the BOEM consults with the U.S. Fish and Wildlife Service (USFWS), the Federal land manager of the Breton NWA area, for plans within 100 km (62 mi) of Breton that exceed a certain emission threshold. Mitigation measures, such as the use of low-sulfur fuel, may be applied (MMS 2007c).

No modeling has been performed for CO. In OCS waters, CO emission sources less than about 7,000 tons/year would not have any significant effect on onshore air quality and are exempt from air quality review under BOEM air quality regulations (MMS 2007c). This is based on air quality modeling that was performed to support the BOEM air quality rules. As shown in Table 4.4.4-1, CO emissions from the proposed action are higher than 7,000 tons/year. However, CO emissions are comparable to NO_2 and SO_2 emissions, and their associated impacts are well within the NAAQS discussed above. In addition, CO standards (40,000 and 10,000 μg/m^3 for 1- and 8-hr averages, respectively) are more than one order of magnitude higher than those for NO_2 and SO_2. Therefore, no significant impacts from CO associated with the proposed action would be anticipated.

Impacts on Ozone. As discussed in MMS (2007c), the impacts from OCS activities on O_3 were evaluated in the GOM air quality study (MMS 1995b). The study focused on the O_3 nonattainment areas in southeast Texas and the Baton Rouge, Louisiana, areas. It was determined through modeling that OCS sources contributed little to onshore O_3 concentrations in either of these areas. At locations where the model predicted 1-hr average O_3 levels above 120 parts per billion (ppb), which was then the NAAQS, the OCS emissions contributed less than 2 ppb to the total concentrations. These contributions occurred in only a small geographic area during any particular episode. At locations where the model predicted O_3 levels were much less than 120 ppb, the highest OCS contributions were about 6–8 ppb. When the modeling was performed after doubling the OCS emissions, the highest OCS contributions at locations where the predicted O_3 levels exceeded the standard was 2–4 ppb.

Again, as noted in MMS (2007c), more recent O_3 modeling was performed using a preliminary GOM-wide emissions inventory for the year 2000 to examine the O_3 impacts with respect to the 1997 8-hr O_3 standard of 80 ppb (effective May 27, 2008, the 8-hr O_3 standard was lowered to 75 ppb). One modeling study focused on the coastal areas of Louisiana extending eastward to Florida (Haney et al. 2004). This study showed that the impacts of OCS emissions on onshore O_3 levels were very small, with the maximum contribution of 1 ppb or less at locations where the standard was exceeded. The other modeling effort dealt with O_3 levels in southeast Texas (Yarwood et al. 2004). The results of this study indicated a maximum contribution of 0.2 ppb or less to areas exceeding the standard.

Due to the complex, nonlinear nature of the photochemical production of ozone in the atmosphere, changing emissions of ozone precursors by a given percentage may not produce a corresponding percentage change in O_3 concentrations. However, the projected emissions from the proposed action would be smaller than the emissions used in the models to ensure that

contributions to O_3 levels from actions associated with the proposed action would be smaller than the figures above.

Impacts on Visibility. The application of the VISCREEN visibility screening model (USEPA 1992) to individual OCS facilities has shown that the emissions are not large enough to significantly impair visibility. It is not known to what extent aggregate OCS sources contribute to visibility reductions. However, the individual emission sources from the proposed action are relatively small and scattered over a large area, and it is not expected that they would have a measurable impact on acid deposition or visibility. The impacts on visibility would be negligible (MMS 2007c).

Greenhouse Gas Emissions and Climate Change. Estimates were made of the total greenhouse gas (GHG) emissions of CO_2, CH_4, and N_2O for all projected OCS oil and gas Program activities (Herkhof 2011). Emission estimates for the various activities were largely based on a comprehensive inventory of air emissions from oil and gas activities in the GOM for 2008 (Wilson et al. 2010). Air emissions resulting from the Program were estimated by considering the exploration and development scenarios presented in Table 4.4.4-1. Emissions are given in terms of teragrams (Tg) of CO_2-equivalent, where one Tg is 10^{12} g (10^6 metric tons). This measure takes into account a global warming potential (GWP) factor, which accounts for the relative effectiveness of a gas to contribute to global warming with respect to the same amount CO_2. In these calculations, CH_4 is given a GWP of 21, while N_2O is given a GWP of 310.

Table 4.4.4-2 lists the total calculated emissions of CO_2, CH_4, and N_2O from activities associated with the Program and compare them with current (2009) U.S. greenhouse gas emissions from all sources (USEPA 2011l). The projected CO_2 emissions from the Program are about 0.068–0.14% of all current CO_2 emissions in the United States. The Program CH_4 emissions are about 0.087–0.17% of the current CH_4 emissions in the United States, which is slightly higher than that for CO_2. The projected N_2O emissions from the Program are about 0.009–0.020% of all current N_2O emissions in the United States. If CO_2, CH_4, and N_2O emissions are combined, the Program emissions are about 0.067–0.14% and 0.066–0.13% of the Nationwide total of three GHG emissions and of all GHG emissions, respectively. The estimated total global GHG emissions in 2005 were approximately 38,726 Tg CO_2-equivalent (74 FR 66539). The estimated Program GHG emissions are about 0.011–0.023% of the total global GHG emissions.

As noted in Section 3.3, GHG emissions are one of the causes of climate change. Climate change is a global phenomenon and predicting climate change impacts requires consideration of large scale or even worldwide GHG emissions, not just emissions at a local level. Climate change predictive capability (modeling) lacks the ability to estimate the impact of GHGs from a particular source or sources such as oil and gas activities associated with the Program. What their impact, if any, would be is determined not only by the emissions from the oil and gas activities themselves, but also by the GHG emissions of other sources throughout the world and whether these other emissions are expected to increase or decrease. In addition, since some GHG gases, such as CO_2, may persist in the atmosphere for up to a century, the potential impacts of any source may extend well beyond the active lifetime of the source or program. This

TABLE 4.4.4-2 Projected Greenhouse Gas Emissions from Oil and Gas Activities in the Gulf of Mexico Planning Areas, 2012-2017 Leasing Program

Pollutant	2012-2017 Program (Tg CO_2-equivalent)[a]	Total 2009 U.S. Emissions from All Sources (Tg CO_2-equivalent)	2012-2017 Program as Percentage of Total 2009 U.S. Emissions
CO_2	3.75–7.65	5,505.2	0.068–0.39
CH_4	0.59–1.14	686.3	0.087–0.166
N_2O	0.03–0.06	295.6	0.009–0.020
$CO_2 + CH_4 + N_2O$	4.37–8.85	6,487.1	0.067–0.136
All GHG[b]	4.37–8.85	6,633.2[b]	0.066–0.133

[a] One Tg is equal to 10^{12} g, or 10^6 metric tons. The CO_2-equivalent for a gas is derived by multiplying the mass of the gas by the associated GWP, which accounts for the relative effectiveness of a gas to contribute to global warming with respect to the same amount CO_2. In these calculations, CH_4 is given a GWP of 21, while N_2O is given a GWP of 310.

[b] Total U.S. GHG emissions also include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride emissions. Estimates of emissions from the Program were not made for these compounds, but they are assumed to be very small.

Source: USEPA 2011l; Herkhof 2011.

said, given the small percentage contributions of oil and gas activities in the GOM to global GHG emissions, the potential impact on climate change would probably be small. Section 3.3 provides some baseline considerations for climate change and Section 4.4.3 and Sections 4.4.6 through 4.4-15 discuss potential impacts to specific impact areas.

4.4.4.1.2 Accidents.

Under the proposed action, the number and types of spills assumed to occur in the GOM include up to eight large spills (≥1,000 bbl) from both pipeline and platforms including one tanker spill and between 235 and 470 small spills (<1,000 bbl) over the 40- to 50-year period of the Program (Table 4.4.2-1). Evaporation of oil from these spills and emissions from spill response and cleanup activities including *in situ* burning, if used, have the potential to affect air quality in the GOM.

Spills and *In Situ* Burning. Evaporation of small accidental oil spills would cause small, localized increases in VOCs. Most of the emissions would occur within a few hours of the spill and would decrease after that period. Large spills would result in emissions over a large area and a longer period of time. Hanna and Drivas (1993) modeled the emissions of various hydrocarbon compounds from a large spill. A number of these compounds, including BTEX and hexane, are classified by the USEPA as hazardous air pollutants. The results showed that these compounds evaporate almost completely within a few hours after the spill occurs. Ambient concentrations peak within the first several hours after the spill starts and are reduced by two orders of magnitude after about 12 hr. The heavier compounds take longer to evaporate and may

not peak until about 24 hr after spill occurrence. Total ambient VOC concentrations are significant in the immediate vicinity of an oil spill, but concentrations are much reduced after the first day (MMS 2007c). Spreading of the spilled oil and action by winds, waves, and currents would further disperse VOC concentrations to extremely low levels over a relatively larger area. Concentrations of criteria pollutants would remain well within NAAQS (MMS 2008b).

Diesel fuel oil could be spilled either in transit or from accidents involving vehicles, vessels, or equipment. A diesel spill would evaporate faster than a crude oil spill. Ambient hydrocarbon concentrations would be higher than those of a crude oil spill but would persist for a shorter time. Also, because any such spill probably would be smaller than some potential crude oil spills, any air quality effects from a diesel spill likely would be lower than those for other spills (MMS 2008b).

In situ burning of spilled crude or diesel would generate a plume of black smoke and emissions of NO_2, SO_2, CO, PM_{10}, and $PM_{2.5}$ that would temporarily affect air quality, but the effects would be small. Fingas et al. (1995) describe the results of a monitoring program of a burn experiment at sea. The program involved extensive ambient measurements during two experiments in which approximately 300 bbl of crude oil was burned. During the burn, CO, SO_2, and NO_2 were measured only at background levels and were frequently below detection levels. Ambient levels of VOCs were high within about 100 m (328 ft) of the fire, but were significantly lower than those associated with a nonburning spill. It appeared that a major portion of these compounds was consumed in the burn. Effects of *in situ* burning for spilled diesel fuel would be similar to those associated with a crude oil spill (MMS 2008b).

A significant component of the pollution from a fire would be soot. Soot would cling to plants near the fire but would tend to clump and wash off vegetation in subsequent rains. Potential contamination of shoreline and onshore vegetation would be limited, however, because oil and gas activities under the proposed action would be at least 15 km (8 NM) offshore, with the exception of any oil- or gas-transport pipelines (MMS 2008b).

Smoke from burning crude oil would contain PAHs. Benzo(a)pyrene, which often is used as an indicator of the presence of carcinogenic varieties of PAHs, is present in crude oil smoke in very small amounts, but in quantities approximately three times larger than in unburned oil (Evans 1988). Investigators have found that, overall, the oily residue in smoke plumes from crude oil is mutagenic, although not highly so. McGrattan et al. (1995) modeled smoke plumes associated with *in situ* burning. Modeling has shown that the surface concentrations of particulate matter do not exceed the health criterion of 150 $\mu g/m^3$ beyond about 5 km (3 mi) downwind of an *in situ* burn. This result appears to be supported by field experiments conducted off Newfoundland and in Alaska (MMS 2007c). This is quite conservative, as this health standard is based on a 24-hr average concentration rather than a 1-hr average concentration.

Catastrophic Discharge Events. In the GOM, a low-probability CDE event could range in size from 900,000 and 7,200,000 bbl, and have a duration of 30–90 days (Table 4.4.2-2). Evaporation of oil from these spills and emissions from spill response and cleanup activities including *in situ* burning, if used, have the potential to affect air quality in the GOM.

In a catastrophic discharge event, oil may be burned to prevent it from entering sensitive habitats. During an *in situ* burn, the conditions exist (i.e., incomplete hydrocarbon combustion and the presence of chlorides in seawater) such that dioxins and furans could potentially form. (Dioxins and furans are a family of extremely persistent chlorinated compounds that magnify in the food chain, and dioxins are a group of potentially cancer-causing chemicals.) A total of 410 controlled burns (corresponding to about 5% of the total leaked oil) were conducted during the DWH event (Lubchenco 2010). Measurements of dioxins and furans during the DWH event *in situ* burning were made and their emission factors were derived (Aurell and Gullett 2010). The estimated levels of dioxins and furans produced by the *in situ* burns were similar to those from residential woodstove fires and slightly lower than those from forest fires, according to USEPA researchers (Schaum et al. 2010), and thus, concerns about bioaccumulation in seafood were alleviated. The reports found that while small amounts of dioxins were created by the burns, the levels that workers and residents would have been exposed to were below USEPA's levels of concern.

The effects of a catastrophic discharge event on public health and the environment can be classified as short-term and long-term effects. The short-term effects include watery and irritated eyes, skin itching and redness, coughing, and shortness of breath or wheezing.

Although there are relatively few studies on air quality impacts to human health following oil spills, some lessons can be learned from the 1991 Kuwaiti oil field fires and the effects of oil burning during the DWH event. In the Kuwaiti event, 600 oil wells were set on fire. These burnings produced a composite smoke plume of gaseous constituents (e.g., NO_x, SO_x, CO_2, etc.), acid aerosols, VOCs, metal compounds, PAHs, and particulate matter. Military personnel deployed to the Persian Gulf War have reported a variety of symptoms attributed to their exposures, including asthma and bronchitis, but Lange et al. (2002) did not find that exposures to oil fire smoke caused respiratory symptoms among veterans.

There would be some residual air quality impacts after the well is capped or "killed." As most of the oil would have been burned, evaporated, or weathered over time, air quality would return to pre-oil spill conditions. While impacts on air quality are expected to be localized and temporary, adverse effects that may occur from the exposure of humans and wildlife to air pollutants could have long-term consequences (BOEMRE 2011).

Hydrogen Sulfide. An accidental release of H_2S in the atmosphere could present a serious hazard to platform workers and persons in close proximity to a platform. H_2S concentrations of 20 ppm, the OSHA ceiling level that must not be exceeded during any part of the workday, causes irritation to exposed persons within minutes and concentrations of 500 ppm are deadly. All OCS operators involved in production of sour gas or oil that could result in atmospheric H_2S concentrations above 20 ppm are required to file an H_2S Contingency Plan with BOEM. The plan contains measures to prevent serious injury or death to personnel. Under a worst-case scenario of an accidental release at a very large facility with a throughput of 100 million cubic feet of gas per day with high H_2S concentration levels (on the order of 20,000 ppm), near-calm wind, and stable atmospheric conditions, the H_2S levels are predicted to be 500 ppm at about 1 km (0.6 mi) from the facility and 20 ppm at several kilometers from the source (MMS 2001c). Most "sour gas" facilities have H_2S concentrations below 500 ppm,

which would result in H_2S levels of 20 ppm that are confined to an area within the dimensions of a typical platform (MMS 2007c).

In the case of an aquatic H_2S release, the gas is soluble in water, so a small gas leak would result in almost complete dissolution into the water column. Larger leaks would result in less dissolution and could result in release into the atmosphere if the surrounding waters reach saturation. Because the oxidation of H_2S in water takes place slowly, there should not be any appreciable zones of hypoxia. H_2S levels can have adverse impacts on mammals, birds, and fish (MMS 2001c).

4.4.4.2 Alaska – Cook Inlet

The OCS facilities located off the coast of Alaska would be under the jurisdiction of the USEPA, which regulates air emissions as prescribed in 40 CFR Part 55. For facilities located within 40 km (25 mi) of a State's seaward boundary, the regulations are the same as would be applicable if the emission source were located in the corresponding onshore area, and would include State and local requirements for emission controls, emission limitations, offsets, permitting, monitoring, testing, and reporting. For facilities located more than 40 km (25 mi) from a State's seaward boundary, the basic Federal air quality regulations apply, including the USEPA emission standards for new sources, PSD regulations, and Title V permits. Both PSD and Title V requirements apply to major sources that, depending on the source type, could potentially emit more than either 100 tons/yr or 250 tons/yr of a criteria pollutant. Which threshold applies to a particular source, how the potential emissions are calculated, and what controls are required if the applicable threshold is exceeded are all issues determined in discussions with regulators during the air permit application and approval process.

The USEPA has established NAAQS for six criteria pollutants — NO_2, SO_2, PM_{10} and $PM_{2.5}$, CO, Pb, and O_3 — because of their potential adverse effects on human health and welfare. The health and environmental effects of air pollutants have been summarized by the USEPA (USEPA 2011a). Ambient levels of criteria pollutants other than Pb can contribute to respiratory illnesses, especially in persons with asthma, children, and the elderly, and PM and CO can also aggravate cardiovascular diseases.

Ozone Formation. O_3 in the atmosphere is formed by photochemical reactions involving primarily NO_x and VOCs. It is formed most readily in the summer season, with high temperatures, lower wind speeds, intense solar radiation, and an absence of precipitation; high-O_3 episodes are typically associated with slow-moving, high-pressure systems characterized by light winds and shallow boundary layers (NRC 1992). However, conditions in Alaska are seldom favorable for significant O_3 formation, primarily due to low ambient temperature. At Kodiak, for example, the highest monthly mean daily maximum of 61.0°F occurs in August, when the highest temperature is 86°F (NCDC 2011a).

Acid Deposition and Visibility. Gaseous pollutants undergo various chemical reactions in the atmosphere to form small particles, which remain airborne for extended periods of time. NO_x compounds react with ammonia and moisture to form ammonium nitrate particles, which

contribute to $PM_{2.5}$ concentrations. SO_2 combines with moisture to form tiny sulfate particles, which may also contribute to adverse health effects. In addition, gaseous NO_x and SO_2 can dissolve into cloud water. These acidic chemicals eventually return to the ground in either wet (e.g., rain, snow) or dry (e.g., gases, particles) forms, commonly referred to as acid deposition or acid rain (USEPA 2011b). Dry deposition and wet deposition are equally important. The deposition often takes place hundreds of miles from the source. Acid deposition can damage forests and crops, change the makeup of soil, and in some cases may make lakes and streams acidic and unsuitable for fish. Deposition of nitrogen from NO_x emissions also contributes to nitrogen load in water bodies, especially estuaries and near-coastal ecosystems. Acid deposition accelerates the decay of building materials and paints, including those of irreplaceable monuments, statues, sculptures, and other cultural resources. Particulate matter, including sulfate and nitrate particles and organic aerosols that form part of photochemical smog, significantly reduce atmospheric visibility. Atmospheric pollutants adversely affect visibility in many national parks and monuments, as well as wilderness areas (USEPA 2011b).

The most important source of visibility degradation is from $PM_{2.5}$ in the 0.1- to 1-μm size range, which covers the range of visible light (0.4–0.7 μm) (Malm 1999). These particles are directly emitted into the atmosphere through fuel burning. However, other sources arise through the chemical transformation of NO_2, SO_2, and VOCs into nitrates, sulfates, and carbonaceous particles. Existing visibility in Alaska is generally good because of the absence of large emission sources.

Arctic Haze. Arctic haze is a reduction in visibility that often appears in distinct bands at different heights. It was initially observed during weather reconnaissance flights in the High Arctic. The haze is seasonal, with a peak in the spring, and originates from anthropogenic sources outside the Arctic. The most severe episodes occur when stable high-pressure systems produce clear, calm weather; these episodes can reduce visibility (~30.6 km [~19 mi]) in spite of the otherwise clear weather. Coal burning appears to be the principle source of haze particles. Haze particles consist of sulfate (up to 90%), soot, and sometimes dust, most of which originate in Eurasia and are picked up by the Arctic airmass that moves northward over the North Pole in winter. The cold, dry air in the polar regions allows particles to remain airborne for weeks, thus permitting the contaminants to spread over the Arctic and into North America. Arctic haze reduces visibility, but the levels of sulfur compounds in haze are lower than those found in heavily polluted cities (AMAP 1997).

4.4.4.2.1 Routine Operations. The Cook Inlet OCS experiences open-water conditions throughout the year, except in small northern portions of the planning area from January to March (MMS 2003a).

Under the proposed action, construction and operation of up to 12 exploration and delineation wells, up to 114 development and production wells, up to 241 km (150 mi) of new offshore pipeline, up to 169 km (105 mi) of new onshore pipeline, and up to 1 new pipeline landfall will result in emissions that could affect air quality in Cook Inlet. These activities would generate emissions from stationary sources at the drilling/well sites and from support vessels and

aircraft over the 40-year period of the Program (Table 4.4.1-3). There could be up to 3 vessel trips/wk and 3 helicopter trips/wk under the proposed action.

Emissions. The type and relative amounts of air pollutants generated by offshore operations vary according to the phase of activity. There are three principal phases of OCS operations: exploration, development, and production. Activities affecting air quality include seismic surveys; drilling activities; platform construction and emplacement; pipeline laying and burial operations; platform operations; flaring; fugitive emissions; support vessel and helicopter operations; and evaporation of VOCs during transfers and spills. Principal emissions of concern are the criteria pollutants and their precursors: NO_x, SO_2, PM_{10}, and $PM_{2.5}$, CO, and VOCs.

Releases of toxic chemicals could be a concern around oil spills and *in situ* burning and especially during accidental releases of H_2S at platforms. Other sources of pollutants related to OCS operations are accidents such as losses of well control and oil spills. Spill emissions consist primarily of VOCs, while fires and *in situ* burning produce criteria pollutants along with hazardous air pollutants.

Air emissions from the proposed action in the Cook Inlet were estimated using the most recent available exploration and development scenarios for 2012–2017 as shown in Table 4.4.4-3. These emissions were estimated by BOEM (Herkhof 2011) using emission factors from the *2008 Gulfwide Emission Inventory Study* (Wilson et al. 2010). Although the study is specific to the GOM, these factors should be applicable in the Cook Inlet, since many of the same types of sources are involved in oil and gas activities in both areas.

TABLE 4.4.4-3 Estimated Highest Annual Air Emissions from OCS Activities in the Cook Inlet Planning Area, Proposed 2012-2017 Leasing Program

	Pollutant (tons/yr)					
Activity	NO_x	SO_x	PM_{10}	$PM_{2.5}$	VOC	CO
Exploration/Delineation Well Drilling	38–38[a]	8–8	3–3	3–3	7–7	0–0
Development/Production Well Drilling	229–382	46–77	16–27	16–27	41–68	1–2
Platform Installation and Removal	213–213	31–31	5–5	5–5	5–5	28–28
Pipeline Installation	331–663	56–113	13–25	13–25	13–25	69–138
Production Platforms	53–53	1–1	0–0	0–0	34–34	60–60
Support Vessels	96–96	13–13	2–2	2–2	2–2	9–9
Helicopters	1–1	0–0	0–0	0–0	2–2	10–10
Tankers Loading	0–0	0–0	0–0	0–0	0–0	0–0
Tankers in Transit	0–0	0–0	0–0	0–0	0–0	0–0
Tankers Unloading	0–0	0–0	0–0	0–0	0–0	0–0
Total	961–1,445	156–243	39–62	39–62	103–143	177–246

[a] The range of values reflects the low and high end of the exploration and development scenarios for the Program.

Source: Herkhof 2011; Wilson et al. 2010.

Oil and gas activity emissions from the Program for the Cook Inlet are relatively small in comparison to those other planning areas. For all pollutants under both low and high scenarios, Cook Inlet emissions are 4% or less of the GOM emissions. They are up to 12% of Arctic regions emissions. In terms of absolute amount, the main emissions would be NO_x followed by CO, with lesser amounts of SO_x, VOCs, PM_{10} and $PM_{2.5}$ in order of descending emissions. Emissions from the Program would initially be lower in the first few years as exploratory wells were drilled and platforms started producing oil and gas. During the last half of the 40-yr Program, emissions would decrease as production decreased and some platforms were removed (MMS 2007c).

Impacts on Criteria Pollutants Other Than Ozone. Air quality modeling for NO_2, SO_2, and PM_{10} were conducted for a lease sale in the Cook Inlet Planning Area (MMS 2003a). Potential air quality impacts were estimated by using the Offshore and Coastal Dispersion model for both exploratory drilling and a production facility. Potential emission sources were placed so as to maximize potential air quality impacts on the Tuxedni Wilderness Area (WA), which is a PSD Class I area in the Cook Inlet. The highest predicted NO_2 concentration in the Tuxedni WA was 0.27 $\mu g/m^3$, about 11% of PSD Class I maximum allowable increment of 2.5 $\mu g/m^3$. For SO_2, the highest predicted annual average, maximum 24-hr, and maximum 3-hr average concentrations in the Tuxedni WA were 0.02, 0.58, and 2.7 $\mu g/m^3$, respectively, for which PSD Class I incremental limits are 2, 5, and 25 $\mu g/m^3$. For PM_{10}, the highest annual average and 24-hr average concentrations in Tuxedni WA were predicted to be 0.02 and 0.51 $\mu g/m^3$, for which PSD Class I incremental limits are 4 and 8 $\mu g/m^3$. The highest onshore pollutant concentrations were lower than or comparable to those in the Tuxedni WA and thus less than the NAAQS and the PSD Class II incremental limits.

Comparing Impacts to PSD Increments

Several points should be considered when air quality impacts are compared to PSD increments. First, the PSD program applies to individual sources, not programs. Emissions from an individual source such as a platform or set of platforms could differ from the emissions being modeled in a particular study. Second, increment tracking is a cumulative process that sets a maximum allowable increase above a baseline concentration. It is unlikely that a permitting agency would permit a single source to consume the entire increment. Last, PSD applies only to major sources, generally sources with the potential to emit more than 250 tons/yr, except the 100 tons/yr threshold for 28 source categories. OCS oil and gas production activities are subject to a 250 tons/yr threshold. Regardless of the *actual* emissions, a source's potential emissions could exceed the 250 tons/yr threshold. Determining *potential* emissions and available PSD increment allowances require consultation with the cognizant regulators.

Each project in the Program would apply the best available control technology according to USEPA and State regulations, and pollutant concentrations would have to meet the PSD incremental limits. Existing pollutant concentrations in the Cook Inlet are well within the NAAQS (MMS 2003a). The small additional concentrations from the Program would result in levels that are still well within the NAAQS.

Impacts on Ozone. As noted above, conditions in Alaska are seldom favorable for significant O_3 formation because of the low ambient temperature. Precursor emissions NO_x and VOCs are relatively small, and a significant increase in O_3 concentrations onshore is not likely to

result from oil and gas activities associated with the proposed action. OCS activities would also be relatively small and separated from each other, diminishing the combined effects from these activities and greatly increasing atmospheric dispersion of pollutants before they reach shore. The proposed activities would not be expected to cause any exceedances of the O_3 standard (MMS 2008b).

Impacts on Visibility. A number of visibility screening runs were performed using the VISCREEN model to evaluate potential effects of oil and gas activities on visibility in the Tuxedni WA (MMS 2003a). For an exploration project located 12 km (7.5 mi) distant from the Tuxedni WA, the model results exceed the screening criteria when the wind blows directly from the facility to the Tuxedni WA, under the worst-case meteorological conditions with a wind speed of 1 m/s (2.2 mph) and stable atmosphere. If the screening criteria are exceeded, it indicates the possibility that a plume generated by the emissions would be visible by an observer within Tuxedni WA. However, it does not provide a measure of any general visibility effects in the area, such as regional haze. It is estimated that this scenario would occur less than 1% of the time. For distances larger than 50 km (31 mi), the screening criteria were not exceeded. Under average meteorological conditions, it is estimated that a plume would not be visible.

Given that oil and gas sources are relatively small and would be scattered over a large area, it is not expected that they would have a measureable impact on visibility. However, a more refined analysis might be needed during the permitting process to more precisely evaluate any effects of oil and gas activities on visibility.

Greenhouse Gas Emissions. Estimates were made of the total GHG emissions of CO_2, CH_4, and N_2O for all projected activities associated with the Program (Herkhof 2011). Emission estimates for the various activities were largely based on a comprehensive inventory of air emissions from oil and gas activities in the GOM for 2008 (Wilson et al. 2010). Air emissions resulting from the Program were estimated by considering the exploration and development scenarios presented in Table 4.4.1-3. Emissions are given in terms of Tg of CO_2-equivalent, where 1 Tg is 10^{12} g (10^6 metric tons). This measure takes into account a GWP factor that accounts for the relative effectiveness of a gas to contribute to global warming with respect to the same amount of CO_2. In these calculations, CH_4 is given a GWP of 21, while N_2O is given a GWP of 310.

Table 4.4.4-4 lists the total calculated emissions of CO_2, CH_4, and N_2O from activities associated with the Program and compares them with current (2009) U.S. greenhouse gas emissions from all sources (USEPA 2011l). The projected CO_2 emissions from the Program are about 0.0025–0.0038% of all current CO_2 emissions in the United States. The Program CH_4 and N_2O emissions are about 0.0004% or less of the current their respective emissions in the United States. If CO_2, CH_4, and N_2O emissions are combined, the Program emissions are about 0.0022–0.0033% and 0.0021–0.0032% of the nationwide total of three GHG emissions and of all GHG emissions, respectively. The estimated total global GHG emissions in 2005 were approximately 38,726 Tg CO_2-equivalent (74 FR 66539). The estimated Program GHG emissions are about 0.00036–0.00055% of the total global GHG emissions.

TABLE 4.4.4-4 Projected Greenhouse Gas Emissions from Oil and Gas Activities in the Cook Inlet Planning Area, 2012-2017 Leasing Program

Pollutant	2012-2017 Program (Tg CO_2-equivalent)[a]	Total 2009 U.S. Emissions from All Sources (Tg CO_2-equivalent)	2012-2017 Program as Percentage of Total 2009 U.S. Emissions
CO_2	0.1363–0.2100	5,505.2	0.00247–0.00382
CH_4	0.0028–0.0028	686.3	0.00041–0.00041
N_2O	0.0006–0.0010	295.6	0.00021–0.00032
$CO_2 + CH_4 + N_2O$	0.1397–0.2138	6,487.1	0.00215–0.00330
All GHG[b]	0.1397–0.2138	6,633.2[b]	0.00211–0.00322

[a] One Tg is equal to 10^{12} g, or 10^6 metric tons. The CO_2-equivalent for a gas is derived by multiplying the mass of the gas by the associated GWP, which accounts for the relative effectiveness of a gas to contribute to global warming with respect to the same amount CO_2. In these calculations, CH_4 is given a GWP of 21, while N_2O is given a GWP of 310.

[b] Total U.S. GHG emissions also include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride emissions. Estimates of emissions from the Program were not made for these compounds, but they are assumed to be very small.

Source: USEPA 2011l; Herkhof 2011.

As noted in Section 3.3, GHG emissions are one of the causes of climate change. Climate change is a global phenomenon and predicting climate change impacts requires consideration of large-scale or even worldwide GHG emissions, not just emissions at a local level. Climate change predictive capability (modeling) lacks the ability to estimate the impact of GHGs from a particular source or sources such as oil and gas activities associated with the Program. What their impact, if any, would be is determined not only by the emissions from the oil and gas activities themselves, but also by the GHG emissions of other sources throughout the world and whether these other emissions are expected to increase or decrease. In addition, since some GHG gases, such as CO_2, may persist in the atmosphere for up to a century, the potential impacts of any source may extend well beyond the active lifetime of the source or program. This said, given the small percentage contributions of oil and gas activities in Cook Inlet to global GHG emissions, the potential impact on climate change would probably be small. Section 3.3 provides some baseline considerations for climate change and Section 4.4.3 and Sections 4.4.6 through 4.4-15 discuss potential impacts on specific impact areas.

4.4.4.2.2 Accidents. Under the proposed action, the number and types of spills assumed to occur in Cook Inlet include up to one large spill (≥1,000 bbl) from either a pipeline or platform and between 8 and 18 small spills (<1,000 bbl) over the 40-year period of the Program (Table 4.4.2-1). Evaporation of oil from these spills and emissions from spill response and cleanup activities including *in situ* burning, if used, have the potential to affect air quality in Cook Inlet.

Spills and *In Situ* Burning. Small accidental oil spills would cause small, localized increases in concentrations of VOCs because of evaporation of the spill. Most of the emissions would occur within a few hours of the spill and would decrease drastically after that period. Large spills would exhibit similar behavior but would affect a somewhat larger area and cause elevated pollutant concentrations to persist somewhat longer. Hanna and Drivas (1993) modeled the emissions of various hydrocarbon compounds from a large spill. A number of these compounds, including BTEX and hexane, are classified by the USEPA as hazardous air pollutants. Many of these contaminants may be carcinogenic to humans and/or animals. The results showed that these compounds evaporate almost completely within a few hours after the spill occurs. Ambient concentrations peak within the first several hours after the spills starts and are reduced by two orders of magnitude after about 12 hr. The heavier compounds take longer to evaporate and may not peak until about 24 hr after spill occurrence. Total ambient VOC concentrations are significant in the immediate vicinity of an oil spill, but concentrations are much reduced after the first day (MMS 2007c). There is no information about any possible effect from the inhalation of air contaminants by subsistence animals, but this effect would be expected to be much less than any contamination by contact with hazardous compounds in the water. These effects on subsistence are described in Section IV.B.3.k of MMS (2007c).

In situ burning is a potential technique for cleanup and disposal of spilled oil. *In situ* burning of a spill results in emissions of NO_2, SO_2, CO, and PM_{10} and generates a plume of black smoke. Fingas et al. (1995) describes the results of a monitoring program of a burn experiment at sea. The program involved extensive ambient measurements during two experiments in which approximately 300 bbl of crude oil was burned. It found that during the burn, CO, SO_2, and NO_2 were measured only at background levels and were frequently below detection levels. Ambient levels of VOCs were high within about 100 m (328 ft) of the fire but significantly lower than those associated with a nonburning spill. Measured concentrations of PAHs were low. It appeared that a major portion of these compounds was consumed in the burn. The appearance of a black plume from *in situ* burning around a subsistence hunting area could have an adverse effect on subsistence hunting practices because of the creation of a perception that wildlife has been contaminated. Subsistence hunters may avoid areas where such incidents have occurred.

McGrattan et al. (1995) modeled smoke plumes associated with *in situ* burning. The results showed that the surface concentrations of particulate matter did not exceed the health criterion of 150 $\mu g/m^3$ beyond about 5 km (3 mi) downwind of an *in situ* burn. This appears to be supported by field experiments conducted off Newfoundland and in Alaska (MMS 2007c). This is quite conservative because this health standard is based on a 24-hr average concentration rather than a 1-hr average concentration.

Air quality impacts from accidental oil spills in open water during the proposed action would be similar to those described above. However, albeit limited to a small northern area and short duration (January to March), a spill in Cook Inlet during broken ice or melting ice conditions could result in more concentrated emissions over a smaller area than would be the case under open-water conditions because the ice would act to reduce spreading of the oil compared to the spreading of a spill in open water. An oil spill on solid sea ice would spread relatively slowly compared to a spill in open water. The more volatile components of the oil

would evaporate rather rapidly, but the heavier compounds would linger on the surface. The effects on air quality would result in more concentrated emissions over a smaller area than would be the case for a spill in open water.

Catastrophic Discharge Event. In the Cook Inlet Planning Area, a low-probability CDE could range in size from 75,000 and 125,000 bbl, with a duration of 50–80 days (Table 4.4.2-2). Evaporation of oil from these spills and emissions from spill response and cleanup activities including *in situ* burning, if used, have the potential to affect air quality in Cook Inlet.

The air impacts of a CDE and any associated *in situ* burning in the Cook Inlet would be similar to those open water impacts discussed in Section 4.4.4.1.2. Potential impacts from a large spill under the ice are discussed in the "Spills and *In Situ* Burning" subsection above.

A CDE in South Central Alaska could emit regulated pollutants into the atmosphere. This may cause major air quality impacts during some phases of the event. The greatest impacts on air quality conditions would occur during the initial explosion of gas and oil and during the spill response and cleanup, particularly if the event occurs during the winter. Impacts could continue for days during the initial event and could continue for months during spill response and clean up. Therefore, while the impacts may be major during these two phases, overall, the emissions from a CDE would be temporary and, over time, air quality in South Central Alaska would return to pre-oil-spill conditions (BOEMRE 2011k).

Hydrogen Sulfide. An accidental release of H_2S at a platform and its associated impacts on platform workers and persons in close proximity to a platform are discussed in detail in Section 4.4.4.1.2 for the GOM. Potential impacts at or around the platform would be similar in the Cook Inlet.

4.4.4.3 Alaska – Arctic

General air emission sources and potential impacts on ambient air quality associated with OCS oil and gas activities are covered in detail in Section 4.4.4.1 for the GOM. Air quality impacts for both the Beaufort and the Chukchi Seas are similar and are discussed together. Differences are noted where appropriate.

The OCS facilities located off Alaska would be under the jurisdiction of the USEPA, which regulates air emissions as prescribed in 40 CFR Part 55. For facilities located within 40 km (25 mi) of a State's seaward boundary, the regulations are the same as would be applicable if the emission source were located in the corresponding onshore area, and would include State and local requirements for emission controls, emission limitations, offsets, permitting, testing, and monitoring. For facilities located more than 40 km (25 mi) from a State's seaward boundary, the basic Federal air quality regulations apply, which include the USEPA emission standards for new sources, the PSD regulations, and Title V permits. Both PSD and Title V requirements apply to major sources that, depending on the source type, could potentially emit more than either 100 tpy or 250 tpy of a criteria pollutant. Which threshold

applies to a particular source, how the potential emissions are calculated, and what controls are required if the applicable threshold is exceeded are all issues determined in discussions with regulators during the air permit application and approval process (MMS 2007c).

The USEPA has established NAAQS for six criteria pollutants — NO_2, SO_2, PM_{10} and $PM_{2.5}$, CO, Pb, and O_3 — because of their potential adverse effects on human health and welfare. The health and environmental effects of air pollutants have been summarized by the USEPA (USEPA 2011a). Ambient levels of criteria pollutants other than Pb can contribute to respiratory illnesses, especially in persons with asthma, children, and the elderly, and PM and CO can also aggravate cardiovascular diseases.

Ozone Formation. O_3 in the atmosphere is formed by photochemical reactions involving primarily NO_x and VOCs. It is formed most readily in the summer season, with high temperatures, lower wind speeds, intense solar radiation, and an absence of precipitation; high-O_3 episodes are typically associated with slow-moving, high-pressure systems characterized by light winds and shallow boundary layers (NRC 1992). However, conditions in Alaska are seldom favorable for significant O_3 formation, primarily due to low ambient temperature. At Barrow, for example, the highest monthly mean daily maximum of 45.9°F occurs in July, when the highest temperature is 79°F (NCDC 2011b).

Acid Deposition and Visibility. Gaseous pollutants undergo various chemical reactions in the atmosphere to form small particles, which remain airborne for extended periods of time. NO_x compounds react with ammonia and moisture to form ammonium nitrate particles, which contribute to $PM_{2.5}$ concentrations. SO_2 combines with moisture to form tiny sulfate particles, which may also contribute to adverse health effects. In addition, gaseous NO_x and SO_2 can dissolve into cloud water. These acidic chemicals eventually return to the ground in either wet (e.g., rain, snow) or dry (e.g., gases, particles) forms, commonly referred to as acid deposition or acid rain (USEPA 2011b). Dry deposition is just as important as wet deposition. The deposition often takes place hundreds of miles from the source. Acid deposition can damage forests and crops, change the makeup of soil, and in some cases may make lakes and streams acidic and unsuitable for fish. Deposition of nitrogen from NO_x emissions also contributes to nitrogen load in water bodies, especially estuaries and near-coastal ecosystems. Acid deposition accelerates the decay of building materials and paints, including those of irreplaceable monuments, statues, sculptures, and other cultural resources. Particulate matter, including sulfate and nitrate particles and organic aerosols that form part of photochemical smog, significantly reduce atmospheric visibility. Atmospheric pollutants adversely affect visibility in many of national parks and monuments, and in wilderness areas (USEPA 2011b).

The most important cause of visibility degradation is from $PM_{2.5}$ in the 0.1- to 1-μm size range, which covers the range of visible light (0.4–0.7 μm) (Malm 1999). These particles are directly emitted into the atmosphere through fuel burning. However, other sources arise through chemical transformation of NO_2, SO_2, and VOCs into nitrates, sulfates, and carbonaceous particles. Existing visibility in Alaska is generally good because of the absence of large emission sources. However, the phenomenon of arctic haze, which occurs in Arctic Alaska during the winter and spring, is caused primarily by long-range transport of pollutants from industrial Eurasia (Rahn 1982).

Arctic Haze. Arctic haze is a reduction in visibility that often appears in distinct bands at different heights. It was initially observed during weather reconnaissance flights in the High Arctic. The haze is seasonal, with a peak in the spring, and originates from anthropogenic sources outside the Arctic. The most severe episodes occur when stable high pressure systems produce clear, calm weather and can reduce visibility (~30.6 km [~19 mi]) in spite of the otherwise clear weather. Coal burning appears to be the principle source of haze particles. Haze particles consists of sulfate (up to 90%), soot, and sometimes dust, most of which originate in Eurasia and are picked up by the Arctic airmass that moves northward over the North Pole in winter. The cold, dry air in the polar regions allows particles to remain airborne for weeks, thus permitting the contaminants to spread over the Arctic and into North America. Arctic haze reduces visibility, but the levels of sulfur compounds in haze are lower than those found in heavily polluted cities (AMAP 1997).

4.4.4.3.1 Routine Operations. OCS operations in the Arctic Ocean are unique in a number of ways because of the sea ice that is present much of the year. In waters 5–10 m (16–33 ft) deep, exploratory wells may be drilled from an ice or gravel island (MMS 2003e). Construction of an ice island would need to take place in winter (November–January), and material and personnel would be carried to the site by vehicles operating on an ice road. In water 10–20 m (33–66 ft) deep, movable platforms attached to the seafloor may be used for exploration. Drilling operations from these platforms are usually conducted during open-water season from July through October. Ice islands are not projected for the Chukchi Sea, because activities there would not occur close to shore. In deeper waters, drillships or floating platforms would be used, and drilling would be limited less than 4 months during the summer. Material and supplies would be ferried using barges or supply boats. In addition, icebreakers would operate in the vicinity of the drilling rig and vessels to control incursions of sea ice. Because of the arctic conditions, the pace of development is slower as activities are limited to certain rather narrow time frames. Air emission rates tend to be higher because activities are more concentrated and additional vessels such as icebreakers may be needed. In shallow waters, production may take place from gravel islands, while in deeper waters production facilities would be installed on large gravity-base platforms. As in the case of exploration, a gravel island would be constructed during winter. The modules for production facilities would be installed during the ice-free period using barges, tugboats, and supply vessels (MMS 2007c).

Under the proposed action, construction and operation of up to 36 exploration wells, up to 400 production wells, up to 92 subsea wells, up to 652 km (405 mi) of new offshore pipeline, and up to 129 km (80 mi) of new onshore pipeline will result in emissions that could affect air quality in the Arctic Alaska. These activities would generate emissions from stationary sources at the drilling/well sites and from support vessels and aircraft over the 50-year period of the Program (Table 4.4.1-4). There could be up to 27 vessel trips/wk and 27 helicopter trips/wk under the proposed action.

Emissions. The type and relative amounts of air pollutants generated by offshore operations vary according to the phase of activity. There are three principal phases of OCS operations: exploration, development, and production. Activities affecting air quality include seismic surveys; drilling activities; platform construction and emplacement; pipeline laying and

burial operations; platform operations; flaring; fugitive emissions; support vessel and helicopter operations; and evaporation of VOCs during transfers and spills.

Releases of toxic chemicals could be a concern around spills and during *in situ* burning and especially during accidental releases of H_2S at platforms. Other sources of pollutants related to OCS operations are accidents such as losses of well control and oil spills. Spill emissions consist primarily of VOCs, while fires and *in situ* burning produce criteria pollutants along with hazardous air pollutants.

Air emissions from the proposed action for the Beaufort Sea and the Chukchi Sea were estimated by using the most recent available exploration and development scenarios for 2012–2017, as shown in Table 4.4.4-5. These emissions were estimated by BOEM (Herkhof 2011) using emission factors from the *2008 Gulfwide Emission Inventory Study* (Wilson et al. 2010). Although the study is specific to the GOM, these factors should be applicable in the Arctic region, since many of the same types of sources are involved in oil and gas activities in both areas.

In terms of absolute amount, the main emissions would be NO_x, followed by CO, with lesser amounts of VOCs, SO_2, PM_{10}, and $PM_{2.5}$. Tankers in transit are projected to be the largest source of emissions associated with oil and gas activities in the Arctic. However, much of the emissions would be at some distance from the lease areas. For sources located in or near the lease areas, platform installation and removal would be the largest source of NO_x, SO_x, PM_{10}, and $PM_{2.5}$ emissions under the low scenario, while pipeline installation would be the largest source of these pollutants under the high scenario. Production platforms would be the largest source of VOC and CO emissions under both scenarios. Emissions from the Program would initially be lower in the first few years as exploratory wells were drilled and platforms started producing oil and gas. During the last half of the Program, emissions would decrease as production decreased and some platforms were removed (MMS 2007c).

Impacts on Criteria Pollutants Other Than Ozone. Air quality modeling using the Offshore and Coastal Dispersion Model (OCD) has been performed in past studies to assess impacts from planned lease sales in the Beaufort Sea (MMS 1996). The highest predicted onshore annual average NO_2 concentrations were in the range of 0.5–1.5 $\mu g/m^3$, which is well below the PSD Class II maximum allowable increment of 25 $\mu g/m^3$. Concentrations of SO_2 and PM_{10} were not modeled; however, when the results are scaled according to the respective emission rates, the levels would be below the PSD Class II maximum allowable increments.

An examination of the air quality modeling analysis performed for the Northstar facility and proposed Liberty development project in the Beaufort Sea provides a measure of the expected impacts over water near an OCS production facility on a gravel island in the Beaufort Sea. The highest predicted concentrations for NO_2, SO_2, and PM_{10} for the Northstar and Liberty projects occurred within 200 m (656 ft) of the facility boundary and were close to but still lower than PSD Class II maximum allowable increments (MMS 2002c; USACE 1999). The highest onshore concentrations were considerably lower. The combined facility concentrations for Liberty plus background were well within NAAQS (between 2 and 30% of the standards).

TABLE 4.4.4-5 Estimated Highest Annual Air Emissions from OCS Activities in the Arctic (Beaufort and Chukchi Seas) Planning Area, Proposed 2012-2017 Leasing Program

	Pollutant (tons/yr)					
Activity	NO_x	SO_x	PM_{10}	$PM_{2.5}$	VOC	CO
Exploration/Delineation Well Drilling	1,977–1,977[a]	512–512	89–89	82–82	86–86	2–2
Development/Production Well Drilling	535–1,375	108–279	38–97	38–97	96–246	2–6
Platform Installation and Removal	925–1,851	217–435	37–73	34–67	32–64	29–58
Pipeline Installation	398–861	68–146	15–33	15–33	15–33	83–179
Production Platforms	53–106	1–3	0–1	0–1	34–68	60–119
Support Vessels	96–191	13–26	2–3	2–3	2–3	9–18
Helicopters	1–2	0–0	0–0	0–0	2–4	10–19
Tankers Loading (Valdez)	47–158	8–27	2–6	2–6	878–2,955	10–33
Tankers in Transit	6,016–20,253	1,022–3,439	227–764	227–764	1,264–4,256	1,249–4,203
Tankers Unloading (West Coast Port)	47–158	8–27	2–6	2–6	440–1,481	10–33
Total	10,095–26,933	1,957–4,893	411–1,072	401–1,059	2,848–9,194	1,462–4,669

[a] The range of values reflects the low and high end of the exploration and development scenarios for the Program.

Source: Herkhof 2011; Wilson et al. 2010.

Results of OCD modeling for development from a proposed lease sale in the Chukchi Sea indicated that the highest annual average NO_2 concentration was 1.29 μg/m^3, which is about 5% of PSD Class II maximum allowable increment of 25 μg/m^3 (MMS 1991). No modeling was performed for SO_2 and PM_{10}, but concentration should be well within the PSD Class II increments considering that NO_x emissions are an order of magnitude higher than SO_2 and PM_{10} emissions.

Comparing Impacts to PSD Increments

Several points should be considered when air quality impacts are compared to PSD increments. First, the PSD program applies to individual sources, not programs. Emissions from an individual source such as a platform or set of platforms could differ from the emissions being modeled in a particular study. Second, increment tracking is a cumulative process that sets a maximum allowable increase above a baseline concentration. It is unlikely that a permitting agency would permit a single source to consume all the increment. Last, PSD applies only to major sources, generally sources with the potential to emit more than 250 tons/yr, other than the 100 tons/yr threshold for 28 source categories. OCS oil and gas production activities are subject to 250 tons/yr threshold. Regardless of the *actual* emissions, a source's *potential* emissions could exceed the 250 tons/yr threshold. Determining potential emissions and available PSD increment allowances requires consultation with the cognizant regulators.

These activities in the Arctic Alaska are not anticipated to affect Class I areas in Alaska, which are several hundred miles away.

The most significant source of industrial emissions in the Arctic Alaska, the Prudhoe Bay-Kuparuk-Endicott oil-production complex, was the subject of monitoring programs during 1986–1987 and from 1990 through 1996. Five monitoring sites were selected; three were considered subject to maximum air pollutant concentrations, and two were considered more representative of the air quality of the general Prudhoe Bay area. All the values meet Federal and State ambient air quality standards. These results indicate that ambient pollutant concentrations from oil and gas activities, even for sites subject to maximum concentrations, are likely to meet the ambient air quality standards (MMS 2008b).

The Program would result in a rather slow rate of development involving a small number of facilities that would be spread over a wide area. Each project would apply the best available control technology according to USEPA and State regulations, and pollutant concentrations would have to meet the PSD incremental limits. Existing pollutant concentrations in coastal Alaska are well within the NAAQS. The small additional concentrations from the Program would result in levels that are still well within the NAAQS.

Impacts on Ozone. As noted above, conditions in Alaska are seldom favorable for significant O_3 formation. Precursor NO_x and VOC emissions are relatively small, and a significant increase in O_3 concentrations onshore is not likely to result from oil and gas activity scenarios associated with the proposed action. Although sunshine is present in the Beaufort Sea program area most of each day during summer, temperatures remain relatively low. At a number of air-monitoring sites in the Prudhoe Bay and Kuparuk areas, O_3 measurements show that the highest 1-hr maximum O_3 concentrations generally are in the range of 0.04–0.09 ppm. The highest 8-hr average ozone concentrations would be well below the NAAQS of 0.075 ppm. Because the projected O_3 precursor emissions from any of the proposed activities are considerably lower than the existing emissions from the Prudhoe Bay-Kuparuk-Endicott

complex, the proposed activities would not be expected to cause any violations of the O_3 standard (MMS 2008b).

Impacts on Visibility. For the proposed Liberty Project in the Beaufort Sea, British Petroleum (Exploration) Alaska (BPXA) ran the VISCREEN model, which calculates the potential impact of a plume of specified emissions for specific transport and dispersion conditions (MMS 2002c). It found noticeable effects on a limited number of days, ones that had the most restrictive meteorological conditions, but no effects at all during average meteorological conditions. This model tends to overestimate impacts, and it is not known to what extent OCS sources contribute to the predicted visibility reductions. The OCS sources are relatively small and would be scattered over a large area. It is not expected that they would have a measureable impact on visibility. Overall, the impacts from the proposed action would be expected to be small or negligible (MMS 2007c).

Greenhouse Gas Emissions. Estimates were made of the total GHG emissions of CO_2, CH_4, and N_2O for all projected activities associated with the Program (Herkhof 2011). Emission estimates for the various activities were largely based on a comprehensive inventory of air emissions from oil and gas activities in the GOM for 2008 (Wilson et al. 2010). Air emissions resulting from the Program were estimated by considering the exploration and development scenarios presented in Table 4.4.1-4. Emissions are given in terms of Tg of CO_2-equivalent, where 1 Tg is 10^{12} g (10^6 metric tons). This measure takes into account a GWP factor, which accounts for the relative effectiveness of a gas to contribute to global warming with respect to the same amount CO_2. In these calculations, CH_4 is given a GWP of 21, while N_2O is given a GWP of 310.

Table 4.4.4-6 lists the total calculated emissions of CO_2, CH_4, and N_2O from activities associated with the Program and compares them with current (2009) U.S. GHG emissions from all sources (USEPA 2011l). The projected CO_2 emissions from the Program are about 0.014–0.038% of all current CO_2 emissions in the United States. Both the projected CH_4 and N_2O emissions from the Program are about 0.002–0.006% of all their current respective emissions in the United States. If CO_2, CH_4, and N_2O emissions are combined, the Program emissions are about 0.013–0.033% and 0.012–0.032% of the Nationwide total of three GHG emissions and of all GHG emissions, respectively. The estimated total global GHG emissions in 2005 were approximately 38,726 Tg CO_2-equivalent (74 FR 66539). The estimated Program GHG emissions are about 0.002–0.006% of the total global GHG emissions.

As noted in Section 3.3, GHG emissions are one of the causes of climate change. Climate change is a global phenomenon and predicting climate change impacts requires consideration of large scale or even worldwide GHG emissions, not just emissions at a local level. Climate change predictive capability (modeling) lacks the ability to estimate the impact of GHGs from a particular source or sources such as oil and gas activities associated with the Program. What their impact, if any, would be is determined not only by the emissions from the oil and gas activities themselves, but also by the GHG emissions of other sources throughout the world and whether these other emissions are expected to increase or decrease. In addition, since some GHG gases, such as CO_2, may persist in the atmosphere for up to a century, the potential impacts of any source may extend well beyond the active lifetime of the source or program. This

TABLE 4.4.4-6 Projected Greenhouse Gas Emissions from Oil and Gas Activities in the Arctic (Beaufort and Chukchi Seas) Planning Area, 2012-2017 Leasing Program

Pollutant	2012-2017 Program (Tg CO_2-equivalent)[a]	Total 2009 U.S. Emissions from All Sources (Tg CO_2-equivalent)	2012-2017 Program as Percentage of Total 2009 U.S. Emissions
CO_2	0.80–2.07	5,505.2	0.014–0.038
CH_4	0.01–0.04	686.3	0.002–0.006
N_2O	0.006–0.019	295.6	0.002–0.006
$CO_2 + CH_4 + N_2O$	0.82–2.14	6,487.1	0.013–0.033
All GHG[b]	0.82–2.14	6,633.2b	0.012–0.032

[a] One Tg is equal to 10^{12} g or 10^6 metric tons. The CO_2-equivalent for a gas is derived by multiplying the mass of the gas by the associated GWP, which accounts for the relative effectiveness of a gas to contribute to global warming with respect to the same amount CO_2. In these calculations, CH_4 is given a GWP of 21, while N2O is given a GWP of 310.

[b] Total U.S. GHG emissions also include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride emissions. Estimates of emissions from the Program were not made for these compounds, but they are assumed to be very small.

Source: USEPA 2011l; Herkhof 2011.

said, given the small percentage contributions of oil and gas activities in Arctic region to global GHG emissions, the potential impact on climate change would probably be small. Section 3.3 provides some baseline considerations for climate change and Section 4.4.3 and Sections 4.4.6 through 4.4-15 discuss potential impacts to specific impact areas.

4.4.4.3.2 Accidents. Under the proposed action, the number and types of spills assumed to occur in Arctic Alaska include up to 3 large spills (≥1,000 bbl) from pipelines or platforms and between 60 and 225 small spills (<1,000 bbl) over the 50-year period of the Program (Table 4.4.2-1). Evaporation of oil from these spills and emissions from spill response and cleanup activities including *in situ* burning, if used, have the potential to affect air quality in the Arctic Alaska.

Spills and *In Situ* Burning. Small accidental oil spills would cause small, localized increases in concentrations of VOCs because of evaporation of the spill. Most of the emissions would occur within a few hours of the spill and would decrease drastically after that period. Large spills would exhibit similar behavior but would affect a somewhat larger area and cause elevated pollutant concentrations to persist somewhat longer. Hanna and Drivas (1993) modeled the emissions of various hydrocarbon compounds from a large spill. A number of these compounds, including BTEX and hexane, are classified by the USEPA as hazardous air pollutants. Many of these contaminants may be carcinogenic to humans and/or animals. The results showed that these compounds evaporate almost completely within a few hours after the spill occurs. Ambient concentrations peak within the first several hours after the spills starts and are reduced by two orders of magnitude after about 12 hr. The heavier compounds take longer to

evaporate and may not peak until about 24 hr after spill occurrence. Total ambient VOC concentrations are significant in the immediate vicinity of an oil spill, but concentrations are much reduced after the first day (MMS 2007c). There is no information about any possible effect from the inhalation of air contaminants by subsistence animals, but this effect would be expected to be much less than any contamination by contact with hazardous compounds in the water. These effects on subsistence are described in Section IV.B.3.k of MMS (2007c).

In situ burning is a potential technique for cleanup and disposal of spilled oil. *In situ* burning of a spill results in emissions of NO_2, SO_2, CO, and PM_{10} and generates a plume of black smoke. Fingas et al. (1995) describes the results of a monitoring program of a burn experiment at sea. The program involved extensive ambient measurements during two experiments in which approximately 300 bbl of crude oil was burned. It found that during the burn, CO, SO_2, and NO_2 were measured only at background levels and were frequently below detection levels. Ambient levels of VOCs were high within about 100 m (328 ft) of the fire, but were significantly lower than those associated with a nonburning spill. Measured concentrations of PAHs were low. It appeared that a major portion of these compounds was consumed in the burn. The appearance of a black plume from *in situ* burning around a subsistence hunting area could have an adverse effect on subsistence hunting practices because of the creation of a perception that wildlife has been contaminated. Subsistence hunters may avoid areas where such incidents have occurred.

McGrattan et al. (1995) modeled smoke plumes associated with *in situ* burning. The results showed that the surface concentrations of particulate matter did not exceed the health criterion of 150 $\mu g/m^3$ beyond about 5 km (3 mi) downwind of an *in situ* burn. This appears to be supported by field experiments conducted off Newfoundland and in Alaska (MMS 2007c). This is quite conservative as this health standard is based on a 24-hr average concentration rather than a 1-hr average concentration.

Air quality impacts from accidental oil spills in open water during the proposed action would be similar to those described above. However, a spill in the Arctic during broken ice or melting ice conditions could result in more concentrated emissions over a smaller area than would be the case under open-water conditions because the ice would act to reduce spreading of the oil compared to the spreading of a spill in open water. An oil spill on solid sea ice would spread relatively slowly compared to a spill in open water. The more volatile components of the oil would evaporate rather rapidly, but the heavier compounds would linger on the surface. The effects on air quality would result in more concentrated emissions over a smaller area than would be the case for a spill in open water.

Catastrophic Discharge Event. In the Arctic, a low-probability CDE could range in size from 1,700,000 and 3,900,000 bbl with a duration of 60–300 days in the Beaufort Planning Area, and from 1,400,000 and 2,100,000 bbl with a duration of 40–75 days in the Chukchi Planning Area (Table 4.4.2-2). Evaporation of oil from these spills and emissions from spill response and cleanup activities including *in situ* burning, if used, have the potential to affect air quality in Arctic Alaska.

The air impacts of a CDE and any associated *in situ* burning in the Arctic would be similar to impacts discussed in Section 4.4.4.1.2. Potential impacts from a large spill under the ice are discussed in the "Spills and *In Situ* Burning" subsection above.

A CDE in Arctic Alaska could emit regulated pollutants into the atmosphere. This may impact local air quality during some phases of the event. The greatest impacts on air quality conditions would occur during the initial explosion of gas and oil and during spill response and clean up, particularly if the event occurs during the winter. Impacts could continue for days during the initial event and could continue for months during spill response and clean up. Therefore, while the impacts may be large during these two phases, overall, the emissions from a CDE would be temporary and, over time, air quality in Arctic Alaska would return to pre-oil-spill conditions (BOEMRE 2011k).

Hydrogen Sulfide. An accidental release of H_2S at a platform and its associated impacts on platform workers and persons in close proximity to a platform are discussed in detail in Section 4.4.4.1.2 for the GOM. Potential impacts at or around the platform would be similar in Arctic Alaska.

4.4.4.4 Conclusions

Routine Program operations in any of the GOM and Alaska Planning Areas would result in levels of NO_2, SO_2, PM_{10}, and CO that are well within NAAQS. The incremental concentrations of NO_2, SO_2, and PM_{10} would be within the maximum allowable PSD increases. Routine Program activities were modeled to contribute less than 1% of the total O_3 concentrations from all OCS oil and gas activities in the GOM, where at some locations, concentrations from all sources (OCS-related and non-OCS sources) exceed standards at times; no exceedance of O_3 standards are expected in the Cook Inlet and Arctic Planning Areas. Therefore, impacts to air quality from routine operations associated with the Program are expected to be minor.

Air quality impacts from large and small accidental oil spills or *in situ* burning would be localized and short-term. Air quality impacts from a large spill (and especially from a CDE) would emit regulated pollutants into the atmosphere. This may cause localized large air quality impacts during some phases of the event. The greatest impacts on air quality conditions would occur during the initial explosion of gas and oil and during the spill response and cleanup, particularly if the spill occurs during the winter. Impacts could continue for days during the initial event and could continue for months during spill response and cleanup. Therefore, while the impacts may be large at times, overall, the emissions from a CDE would be temporary and, over time, air quality would return to pre-oil-spill conditions.

4.4.5 Potential Impacts on the Acoustic Environment

This section identifies impact producing factors and potentially impacted resources (such as marine mammals). Details on impacted resources (such as individual species) are provided in the specific resource sections of Chapter 4.

4.4.5.1 Introduction

The BOEM has screened seismic, deep-tow sonar, electromagnetic survey, geological and geological sampling, remote sensing, and marine magnetic survey activities for potential impacts on marine mammals; sea turtles; fishes; commercial, personal, and recreational fisheries; coastal and marine birds; benthic communities; cultural resources; subsistence uses of natural resources; military uses; and recreational and commercial diving in the GOM (BOEM unpublished), but did not cover other routine operations such as construction, drilling, explosives, and support vessels and aircraft. The study reviewed EAs, EISs, and relevant literature pertinent to OCS activities and identified resources such as marine mammals for impact analysis. A preliminary screening using resource-specific significance criteria based on accepted threshold levels was conducted to identify those G&G seismic survey activities and resources with potential for non-negligible impacts. Various technologies were evaluated for each type of activity, and impacts from air gun noise, sonar noise, vessel traffic, towed streamers, and aircraft traffic were considered. Only seismic surveys were determined to have potential adverse impacts on marine mammals, sea turtles, fishes, and commercial and recreational fisheries. The other survey activities screened were determined to have negligible or no measurable acoustic impacts. These results should also be relevant to the Arctic region and south central Alaska and include potential for impacts to personal-use and subsistence fisheries and taking of marine mammals.

4.4.5.1.1 Routine Operations. Table 4.4.1-1 details impact producing factors for routine activities associated with oil and gas activities and the project phases in which they can occur. Noise associated with offshore OCS oil and gas activities results from exploration activities, construction of onshore and offshore facilities and pipelines involving activities such as pile driving, trenching, earth moving, and building, the operation of fixed structures such as offshore platforms and drilling rigs, maintenance, aircraft and service-vessel traffic including icebreakers, and platform removal, and results in changed ambient noise conditions during those activities.

During exploration, noise is generated by operating air gun arrays, drilling, and support vessels and aircraft. During the development phase, noise is generated by drilling, ship and aircraft traffic, pipeline trenching, platform and other offshore construction, and onshore construction. During production operations, noise is generated by maintenance activities, ship and aircraft traffic, and various production activities and associated equipment such as pumps. During production, air gun–supported deep penetration 4D seismic operations that incorporate changes in reservoirs over time, if used, will also cause noise. Workover rigs also conduct drilling activity during the production phase, albeit with lesser noise levels than original drilling.

Decommissioning noise is generated by explosive and nonexplosive structure removal, and supporting ship and aircraft traffic.

Noise generated from these activities can be transmitted through both air and water and may be extended or transient, and pulsed or constant. Offshore drilling and production involves various activities that produce a composite underwater noise field. As described in Section 3.6, the intensity level and frequency of the noise emissions are highly variable, both between and among the various industry sources. Noise from proposed OCS activities may affect resources. Whether a sound is or is not detected by marine organisms will depend both on the acoustic properties of the source (spectral characteristics, intensity, and transmission patterns) and sensitivity of the hearing system in the marine organism. Anthropogenic noise can cause physical damage to or death of an exposed animal; intense levels can damage hearing, and, if particularly loud or novel, may induce disruptive behavior and cause stress-related responses, such as endocrine responses (MMS 2006a, 2008a).

4.4.5.1.2 Accidents. Accidental events with the potential for affecting ambient noise conditions include oil spills involving transport and support vessels and tankers, loss of well control, and spill response activities. Oils spills can occur both offshore and at coastal facilities and have occurred in coastal waters at shoreline storage, processing, or transport facilities.

Improperly balanced well pressures that result in sudden, uncontrolled releases of fluids from a wellhead or wellbore are referred to as loss of well control. Loss of well control can occur during exploratory drilling, development drilling, production, completion, or workover operations. In the event of a loss of well control, the eruption of gases and fluids may generate significant pressure waves and noise. During a loss of well control, the pressure waves and noise generated by the eruption of gases and fluids might be significant enough to harass or injure marine mammals, depending on the proximity of the animal to the site of the loss of well control (MMS 2006a).

Accident response and support activities, including support aircraft and vessels, involved in mitigating loss of well control and spills affect ambient noise conditions. For smaller spills, response actions (and associated changes in ambient noise) in open water would be expected to be localized and of relatively short duration. In the event of a large spill or a catastrophic spill event covering a greater ocean area and contacting the shore or moving into coastal and inland wetlands, longer term response activities including seismic surveys, skimmers, and other mechanical equipment, would affect ambient noise conditions over a wider area and for a longer time than would response activities for small spills. The nature, magnitude, and duration of noise-related impacts depends on the magnitude, frequency, location, and date of accidents, characteristics of spilled oil, spill-response capabilities and timing, and various meteorological and hydrological factors (MMS 2006a, 2007c). For spills, accident response and cleanup activities, including intentional hazing, would be the primary sources of acoustic impacts.

4.4.5.2 Gulf of Mexico

4.4.5.2.1 Routine Operations. Routine activities that affect ambient noise conditions in some portions of the GOM include seismic surveys, drilling noise, ship and aircraft noise, offshore and onshore construction, operational activities, and decommissioning (see Section 3.6.1 for details on the noise levels and frequencies associated with routine operational activities).

Under the proposed action, seismic surveys would be conducted to identify locations for up to 2,100 exploration wells (Table 4.4.1-1). Noise from these seismic surveys and the associated survey and support vessels would affect the acoustic environment. Air gun noise can be detected up to 100 km (62 mi) from the source, so, under appropriate conditions (see Section 3.6.1.4.4), the affected area can be extensive, but the greatest changes to ambient noise levels would occur at locations closer to the air gun. Effects could include behavioral and physical effects on marine mammals and sea turtles. Impacts of seismic surveys on marine mammals and sea turtles are presented in Sections 4.4.7.1 and 4.4.7.4, respectively. In addition to the noise, the high-pressure pulse and associated particle motion in the near field is a concern for fish. Potential impacts on fish are discussed in Section 4.4.7.3. Commercial and recreational fishing could be affected if behavioral changes in target species (MMS 2007c) occur as a result of exposure to seismic surveys (see Section 4.4.11). These impacts would continue for the duration of the survey, and the affected area would move along with the survey and support vessels. Because these activities would be short term, potential impacts on ecological resources may be equated to incur short-term effects.

Under the proposed action, construction and installation of exploration and delineation wells (up to 2,100), development and production wells (up to 2,600), platforms (up to 450), FPSOs (up to 2), and offshore pipelines (up to 12,000 km [7,500 mi]) will result in increases in noise levels in the vicinity of these construction activities. With the exception of pipeline trenching, construction and installation activities would generate noise from stationary noise sources at the drilling/well sites and from support vessels and aircraft.

Noise from pile driving, construction of offshore platforms and pipelines and noise from the associated support vessels and aircraft would cause noise that would disturb marine mammals (Section 4.4.7.1) and sea turtles (Section 4.4.7.4) in the vicinity of the construction activity and may cause fish to leave the construction area (see Section 4.4.7.3). Pipeline trenching and onshore construction could cause behavioral effects in birds, especially if the noises occur near nesting colonies during nesting periods (see Section 4.4.7.2). Marine species in nearby waters could also be affected. These effects would persist for the duration of the activity and would be strongest at the construction site or along the line of the trenching activity or routes of the vessels or aircraft. Multiple construction projects in the same vicinity could have increased noise impacts.

Additional noise-related impacts could be caused by dredging operations. Noise from dredging generally reaches background levels within 25 km (16 mi), but can extend even farther and thus can affect a fairly wide area.

Under the proposed action, drilling noise during exploration and production would be relatively constant for the duration of the drilling. Drilling noise generally would be less than ambient background levels beyond 30 km (19 mi) from the drill site (see Section 3.6.1.4) and would be strongest near the well. Noise levels would increase if several wells were located in proximity to one another. The principal noise concern in the GOM is the potential to affect marine mammals, sea turtles, and fish (see Sections 4.4.7.1, 4.4.7.4, and 4.4.7.3, respectively).

In addition to drilling noise, machinery on platforms also generates noise during operation. Such noise could be continuous or transient and variable in intensity, depending on the nature and role of the machinery. Underwater noise would be relatively low intensity because the noise sources are on decks well above the surface of the water and because of the small surface area of the legs in contact with the water, but it could affect marine mammals (see Section 3.6.1.4.3).

Under the proposed action, vessel traffic (up to 600 trips per week for up to 45 platforms) and helicopter traffic (up to 5,500 trips per week) will result in increases in noise levels along the traffic routes and at the platforms during construction and operation. Sound generated by these activities will be transient at any one location, may be variable in intensity (MMS 2006a), and may affect marine mammals, sea turtles, and birds (see discussions in Section 4.4.7). Noise from vessel traffic generally reaches background levels within 10 km (6 mi) of the source, but may be detectable at very large distances in deep water. Flights over land would also affect terrestrial mammals (see Section 4.4.7.1). How far sounds travel from vessels is highly variable, depending on environmental conditions and the type of vessel. However, noise would be transient along the traffic path but would recur as long as trips continue. Frequent overflights could produce longer term consequences (MMS 2007c, 2008a).

Noise from decommissioning could result from dismantlement of above-platform structures and the use of underwater explosive or mechanical means to collapse or sever the platform. Marine mammals, sea turtles, and fish could be affected by the noise and shock wave, especially that associated with the use of explosives (see Sections 4.4.6 and 4.4.7). Nonexplosive impacts from dismantling activities and support vessels and aircraft would continue for the duration of the activity and be localized around the facility being decommissioned. Noise and the pressure pulse from explosive detonation would be short term, but the pressure pulse could cause serious impacts on nearby marine mammals (MMS 2007c, 2008a) (also see Section 4.4.7.1). Explosive detonation impacts would be strongest near the detonation site.

4.4.5.2.2 Accidents.

Spills. Under the proposed action, the number and types of spills assumed to occur in the GOM Planning Area include up to 7 large spills (≥1,000 bbl) from both pipeline and platforms, and as many as 470 smaller spills (<1,000 bbl) and up to one tanker spill of up to 3,100 bbl (Table 4.4.2-1). Noise from emergency and spill-response activities and support vessels and aircraft has the potential to disturb marine mammals, sea turtles, fish, and birds. For smaller spills, noise generated from response actions in open water would be expected to be localized

and of relatively short duration. In the event of a large spill covering a greater ocean area and contacting the shore or moving into coastal and inland wetlands, longer term response activities, including seismic surveys, skimmers, and other mechanical equipment, over a wider area would be required and associated noise would occur over a wider area. Noise from response equipment and support vessels and aircraft could disturb animals in the vicinity of the response action, temporarily for smaller spills and for longer periods for larger spills (see the biota-specific discussion in Section 4.4.7). Noise along the trajectories of support vessels and aircraft would be transient and localized along the trajectory but would recur for the duration of the spill response. Response activities for onshore spills or offshore spills that reached the land would have similar impacts but would also affect terrestrial species (MMS 2006a, 2007c).

Catastrophic Discharge Event. The PEIS analyzes a CDE that may range in size from 900,000 to 7,200,000 bbl (Table 4.4.2-2). Sources of noise and impacts would be similar to those above for spills. The pressure wave and noise generated from an incident involving a loss of well control could affect marine mammals and could be large enough to harass or disturb them if they were close enough to the site of the event (MMS 2006a). In addition, accident response and support activities, including support aircraft and vessel activity, have the potential to cause noise impacts. These impacts would occur both at the site of the response activity and along the trajectories of support vessels and aircraft. For smaller spills, the noise would be localized and occur throughout the duration of the response activities. Noise along support vessel and aircraft routes would be transient and localized along the route but would recur for the duration of the response. For larger spills and CDEs, the ensonified area would depend on the size of the spill and the extent of the response area. The impacts could cover a larger area, as was the case for the DWH event, and be more sustained over a longer time depending on the volume, location, duration, and weather conditions during the CDE and the response and cleanup activities.

4.4.5.3 Alaska – Cook Inlet

The impact producing factors for noise that may be expected for the Cook Inlet Planning Area under the proposed action include seismic surveys, ship and aircraft traffic, drilling and trenching, offshore construction, and production operations. There would be no onshore new construction involving pipeline landfalls, shore bases, processing facilities, or waste facilities and no platform removals in the Cook Inlet Planning Area under the proposed action (see Table 4.4.1-3).

4.4.5.3.1 Routine Operations. Routine activities that could potentially cause changes in ambient noise levels in Cook Inlet include seismic surveys, drilling noise, ship and aircraft noise, offshore construction, and operational activities. See Section 3.6.1.4 for details on the noise levels and frequencies associated with routine operational activities.

Under the proposed action, seismic surveys would be conducted to identify locations for up to 12 exploration and delineation wells (Table 4.4.1-3). Air gun noise can be detected up to 100 km (62 mi) from the source and beyond under appropriate conditions (see Section 3.6.1.4.4), so the affected area can be extensive, although changes in ambient noise levels would be greatest

at locations closest to the air gun. Noise from these seismic surveys and the associated survey and support vessels would alter the acoustic environment and affect ecological resources in the planning area. Effects could include physical and behavioral changes in marine mammals and fish and disturbance of birds. See Section 4.4.7 for discussions of noise impacts on ecological resources of the planning area. Targeted species for commercial, personal-use, subsistence, and recreational fishing could also be affected (MMS 2007c). These impacts would continue for the duration of the survey, and the affected area would move along with the survey and support vessels.

Noise from construction of as many as 3 offshore platforms, up to 114 development and production wells, 241 km (150 mi) of offshore pipeline, and 169 km (105 mi) of onshore pipeline, as well as noise from the associated support vessels and aircraft, could disturb marine mammals (see Section 4.4.7.1) as well as birds (see Section 4.4.7.2) in the vicinity of the construction activity. Construction activity may cause fish to leave the construction area (see Section 4.4.7.3). These effects would persist for the duration of the activity and could persist for weeks after the end of the activity and would be strongest at the construction site or along the line of any required offshore trenching activity. Multiple construction projects occurring simultaneously in the same vicinity or over multiple years would have increased noise impacts. Any effects would persist for the duration of the construction and be strongest near the construction site.

Under the proposed action, pile driving drilling noise during exploration, development, and production would be relatively constant for the duration of the drilling. Drilling noise generally would be less than ambient background levels beyond 30 km (19 mi) from the drill site (see Section 3.6.1.4.3) and would be strongest near the well. Noise levels would increase if several wells were operating simultaneously in close proximity to one another. The noise could have impacts on mammals, fish, and birds in Cook Inlet as discussed in Section 4.4.7. Noise and vessel traffic associated with oil and gas activities in offshore areas adjacent to boundaries of the Lake Clark National Park and Preserve, the Katmai National Park and Preserve, and State wildlife refuges and ranges bordering Cook Inlet could temporarily disturb some wildlife and negatively affect recreational values for park users (Section 4.4.12) (MMS 2007c).

In addition to drilling noise, machinery on platforms generates noise during operation. Such noise could be continuous or transient and variable in intensity depending on the nature and the role of the machinery. Underwater noise would be relatively weak because of the small surface area in contact with the water, but it could affect marine mammals (MMS 2006a). Because there would be no more than three platforms developed as a result of leasing under the Proposed Action Alternative, noise impacts from platform operation are anticipated to localized.

Under the proposed action, vessel traffic (up to three trips per week) and helicopter traffic (up to three trips per week) will result in increases in noise levels along the traffic routes and at platforms during construction and operation. Sound generated by these activities is transient and variable in intensity; it may affect mammals, fish, and birds, as discussed in Section 4.4.7. Noise from vessel traffic generally reaches background levels within 10 km (6 mi) of the source, but may be detectable at very great distances in deep water. Flights over land would also affect terrestrial mammals (see Section 4.4.7.1). The noise would be transient along the traffic path but

would recur as long as trips continue. Frequent overflights could produce longer term consequences (MMS 2007c, 2008a).

Although Cook Inlet is generally more than 90% ice free and the Federal waters of Cook Inlet are not seasonally icebound, any icebreaker activity may increase as a result of the proposed action and could result in increased disturbance of marine mammals. However, most exploration activity takes place during the open-water season, minimizing the effects on polar bears (MMS 2008b). Icebreakers operate in support of exploration including seismic survey, construction, and operation activities. Icebreakers do not operate during the open-water season. Icebreaking vessels produce louder, but also more variable, sounds than those associated with other vessels of similar power and size. Icebreaker noise can be substantial out to at least 5 km (3 mi) and may be detectable from more than 50 km (31 mi) away. Icebreaker noise would add to the impacts discussed above for the particular activity they were supporting, but any increases would not occur during the open-water season. Impacts would be transient along the path of the icebreaker and would be strongest near the path.

There is currently no subsistence whaling in Cook inlet, but there is some potential for noise-induced alterations in marine mammal behavior. Local residents have consistently indicated that whales and other marine mammals are very sensitive to noise and that they have been disturbed from their normal patterns of behavior by past seismic and drilling activities (Section 4.4.13). Lease stipulations have minimized such problems in the recent past, so noise and disturbance effects are expected to be effectively mitigated (MMS 2006a). See Sections 4.4.10.2.1 and 4.4.13.2.1 for discussions of noise impacts on land use and subsistence harvests, respectively.

4.4.5.3.2 Accidents.

Spills. Under the proposed action, the number and types of spills assumed to occur in the Cook Inlet Planning Area include up to one large spill (≥1,000 bbl) from either a pipeline or a platform and as many as 18 small (<1,000 bbl) spills (Table 4.4.2-1). Noise from emergency and spill-response activities and support vessels and aircraft has the potential to disturb marine mammals, fish, and birds. For smaller spills, noise generated from response actions in open water would be expected to be localized and of relatively short duration. In the event of a large spill covering a greater ocean area and contacting the shore or moving into coastal and inland wetlands, longer term response activities over a wider area would be required and associated noise would occur over a wider area. Noise from response equipment and activities including seismic surveys, skimmers, and other mechanical equipment and support vessels and aircraft could disturb animals in the vicinity of the response action, temporarily for smaller spills and for longer periods for larger spills and catastrophic discharge events (see biota-specific discussions in Section 4.4.7). Noise along the routes of support vessels and aircraft would be transient and localized along the route but would recur for the duration of the response. Response activities for onshore spills or offshore spills that reached coastal areas would have similar acoustic impacts on nearby marine mammals and birds and affect terrestrial species (see Section 4.4.7).

Catastrophic Discharge Event. The PEIS analyzes a CDE that may range in size from 75,000 to 125,000 bbl (Table 4.4.2-2). Sources of noise and impacts would be similar to those above for spills. The pressure wave and noise generated from an incident involving a loss of well control could affect marine mammals and could be large enough to harass or disturb them if they were close enough to the site of the event (MMS 2006a). In addition, accident response and support activities, including support aircraft and vessel activity, have the potential to cause noise impacts. These impacts would occur both at the site of the response activity and along the routes of support vessels and aircraft. Noise would be localized and occur throughout the duration of the response activities. Noise along support vessel and aircraft routes would be transient and localized along the route but would be recurring for the duration of the response. However, the spill itself and the response and cleanup activities would likely occur over a larger ocean area, could contact larger coastal and inland areas, and take place over a longer time. Thus, the impacts could cover a larger area and be more sustained over a longer time depending on the volume, location, duration, and weather conditions during the CDE and the response and cleanup activities.

4.4.5.4 Alaska – Arctic

The impact-producing factors for noise that may be expected in Arctic Alaska under the proposed action include seismic surveys, ship and aircraft traffic, drilling and trenching, offshore construction, construction of onshore pipeline, and production operations. There would be no onshore construction involving pipeline landfalls or shore bases and no platform removals in Arctic Alaska under the proposed action (see Table 4.4.1-4).

4.4.5.4.1 Routine Operations. Routine activities that will affect ambient noise conditions in the Beaufort Sea and Chukchi Sea Planning Areas include seismic surveys, drilling noise, ship and aircraft noise, icebreaker noise, offshore construction, onshore pipeline construction, and operational activities. See Section 3.6.1.4 for details on the noise levels and frequencies associated with routine operational activities.

Under the proposed action, seismic surveys would be conducted to identify locations for up to 36 exploration wells (16 in the Beaufort Sea Planning area and 20 in the Chukchi Sea Planning Area). Air gun noise can be detected up to 100 km (62 mi) from the source and beyond under appropriate conditions (see Section 3.6.1.4.4), so the affected area can be extensive, although changes in ambient noise levels would be greatest at locations closest to the air gun. Noise from these seismic surveys and the associated survey and support vessels would alter the acoustic environment and affect ecological resources in the planning area. Effects would include physical and behavioral changes and disturbance in marine mammals and fish. Marine and coastal birds could also be affected. See Section 4.4.7 for discussions of noise impacts on ecological resources of the two planning areas. The potential for affecting ecological resources would continue for the duration of the survey activities.

Under the proposed action, construction and installation of exploratory and production wells (up to 36 and 400, respectively), platforms (up to 9), onshore pipelines (up to 129 km

[80 mi]), offshore pipelines (up to 652 km [405 mi]), and subsea wells (up to 92 [up to 10 in the Beaufort Sea Planning Area and up to 81 in the Chukchi Sea Planning Area]) will result in increases in noise levels in the vicinity of these construction activities. With the exception of pipeline trenching, construction and installation activities would generate noise from stationary noise sources at the drilling/well sites and from support vessels and aircraft.

Noise from pile driving, construction of offshore platforms and pipelines, support vessel and aircraft traffic, and gravel placement activities could disturb normal behaviors in marine mammals, birds, and fish in the vicinity of the construction activities (see Section 4.4.7). These effects would persist for the duration of the activity and would be strongest at the construction site(s) or along the line of any required trenching activity. Multiple construction projects occurring simultaneously in the same vicinity or over multiple years would have increased noise impacts.

Construction of up to 129 km (80 mi) of onshore pipeline on areas adjacent to the Beaufort Sea would cause noise that would disturb terrestrial mammals (see Section 4.4.7.1). Impacts would depend on the season and proximity to critical habitat and would persist for the duration of the construction activity. Affected areas would move as the active construction area progressed along the pipeline route. Marine mammals, birds, and fish in nearby waters could be affected. Given that there would be no new pipeline landfalls and no new shore bases constructed, little or no additional onshore construction is anticipated under the proposed action, any noise-related impacts would be limited to relatively few terrestrial mammals and birds. Any effects would persist for the duration of the construction and be strongest near the construction site. Additional noise-related impacts could be caused by gravel excavation activities.

Under the proposed action, drilling noise would be relatively constant during exploration phase drilling and during development and production phase drilling. Drilling noise generally would be less than ambient background levels beyond 30 km (19 mi) from the drill site (see Section 3.6.1.4.3) and strongest near the well. Noise levels would increase if several wells were located in close proximity to one another. The drilling noise could affect marine mammals, birds, and fish (see the biota-specific discussion in Section 4.4.7).

In addition to drilling noise, machinery on platforms generates noise during operation. Such noise could be continuous or transient and variable in intensity depending on the nature and the role of the machinery. Underwater noise would be relatively weak because of the small surface area in contact with the water, but it could affect marine mammals (MMS 2006a).

Under the proposed action, vessel traffic (up to 27 trips per week) and helicopter traffic (up to 27 trips per week) will result in increases in noise levels along the traffic routes and at the platforms during construction and operation. Vessel traffic in Arctic Alaska occurs primarily in the summer (MMS 2007c). Sound generated by these activities is transient and variable in intensity and may affect terrestrial and marine mammals, marine and coastal birds, and fish, as discussed in Section 4.4.7. Noise from vessel traffic generally reaches background levels within 10 km (6 mi) of the source, but may be detectable at very large distances in deep water. Flights over land would also affect terrestrial mammals (see Section 4.4.7.1). The noise would be

transient along the traffic path but would recur as long as trips continue. Frequent overflights could produce longer term consequences (MMS 2007c, 2008a).

Icebreaker activity in the Beaufort Sea and Chukchi Sea areas could increase under the proposed action if needed to support exploration, construction, and operation activities. In addition to icebreaking activities when there is ice cover, icebreakers also engage in ice management activities during the summer. Icebreakers do not operate during the open-water season. Icebreaking vessels produce louder, but also more variable, sounds than those associated with other vessels of similar power and size. Icebreaker noise can be substantial out to at least 5 km (3 mi) and may be detectable from more than 50 km (31 mi) away (see Section 3.6). Icebreaker noise would add to the impacts discussed above for the particular activity they were supporting. Impacts would be transient along the path of the icebreaker and would be strongest near the path.

Noise during staging activities for exploration, development, and production would likely occur in areas with existing infrastructure, such as Deadhorse, and cause little direct impact on local native communities. Noise from vessel and aircraft traffic, seismic surveys, and icebreakers could also disturb marine mammals, birds, and fish and thus potentially affect subsistence harvests and resources. Lease stipulations have minimized such problems in the recent past, so noise and disturbance effects are expected to be effectively mitigated (ArcMS 2008).

4.4.5.4.2 Accidents.

Spills. Under the proposed action, the number and types of spills assumed to occur in the Arctic region include up to 3 large spills (≥1,000 bbl) from pipelines and platforms and between 60 and 225 small (<1,000 bbl) spills over the 50-yr period of the Program (Table 4.4.2-1). Noise generated from response actions in open water would be expected to be localized and of relatively short duration. In the event of large spills covering a greater ocean area and contacting the shore or moving into coastal and inland wetlands, longer term response activities over a wider area would be required and the associated noise would occur over a wider area. Noise from response equipment and activities including seismic surveys, skimmers, and other mechanical equipment and support vessels and aircraft could disturb marine mammals, birds, and fish, as well as invertebrate prey species in the vicinity of the response action; the impact would be temporary for smaller spills and of longer duration for larger spills (see biota-specific discussions in Section 4.4.7). Noise along the routes of support vessels and aircraft would be transient and localized but would recur for the duration of the spill response. Response activities for onshore spills or offshore spills that reached the land could have similar impacts but would also affect terrestrial species (MMS 2006a, 2007c).

Catastrophic Discharge Events. In the Arctic Planning Areas, the PEIS analyzes a CDE that may range in size between 1,700,000 and 3,900,000 bbl in the Beaufort Planning Area and a CDE of between 400,000 and 2,100,000 bbl in the Chukchi Planning Area (Table 4.4.2-2). Sources of noise and impacts would be similar to those above for spills. The pressure wave and noise generated from an incident involving a loss of well control would affect marine mammals

and could be large enough to harass or disturb them if they were close enough to the site of the event (MMS 2006a). In addition, accident response and support activities, including support aircraft and vessel activity, have the potential to cause noise impacts. These impacts would occur both at the site of the response activity and along the routes of support vessels and aircraft. Noise would be localized and occur throughout the duration of the response activities. Noise along support vessel and aircraft routes would be transient and localized along the route but would recur for the duration of the response. However, the spill itself and the response and cleanup activities would likely occur over a larger ocean area, could contact larger coastal and inland areas, and take place over a longer time. Thus, the impacts could cover a larger area, as was the case for the DWH event, and be more sustained over a longer time depending on the volume, location, duration, and weather conditions during the CDE and the response and cleanup activities.

4.4.5.5 Conclusion

Noise impacts due to routine operations under the proposed action would be unavoidable. Noise could affect terrestrial and marine mammals, fish, and birds primarily through disturbance and disruption of normal activities (see Section 4.4.7). Terrestrial mammals could be similarly affected by onshore construction activities. Noise may also affect the ability of subsistence users and others to gather resources. The magnitude of the impact would vary with the type of resource affected, the timing of the noise-generating activity, the noise footprint, and location of the resource in relationship to the noise-generating activity. In general, the nature and magnitude of impacts from single transient and short-term noises would be different than those associated with continuous, long-term noise. Impacts to ambient noise levels from routine operations associated with the Program are expected to be minor.

Noise from emergency and spill-response activities and activities including seismic surveys, skimmers, and other mechanical equipment and support vessels and aircraft has the potential to disturb marine mammals, fish, and birds. The noise impacts would persist for the duration of the response efforts. Response noise for small spills would be expected to have short-term temporary impacts; response noise for large spills (and especially for CDE-level spills) would have longer term impacts because of the longer duration of spill response activities. As the time over which the response activities continue increases, the chance for permanent noise impacts on some resources (e.g., mammals, birds) may also increase.

4.4.6 Potential Impacts on Marine and Coastal Habitats

4.4.6.1 Coastal and Estuarine Habitats

4.4.6.1.1 Gulf of Mexico (GOM). Coastal and estuarine habitats could be directly or indirectly affected by a number of factors associated with oil and gas activities (Table 4.4.6-1). These factors include vessel traffic, maintenance dredging of navigational canals, construction

TABLE 4.4.6-1 Impacting Factors for Coastal and Estuarine Habitats in the Gulf of Mexico

	Habitat Type		
Oil and Gas Impacting Factors[a]	Barrier Landforms	Wetlands	Seagrasses
Vessel traffic (all phases)	X	X	X
Navigation channel maintenance dredging (operations)	X	X	X
Pipeline emplacement (construction)	X	X	X
Construction of onshore facilities (construction)		X	X
Expansion of onshore facilities (construction)	X	X	X
Use of existing facilities (operations)	X	X	X
Expansion of ports and docks (construction)	X	X	X
Disposal of OCS-related wastes (all phases)		X	X
Accidental spills (all phases)	X	X	X

[a] X = Potential impacts on the resource attributable to the impacting factor.

and operation of onshore facilities, installation and maintenance of pipelines, expansion of ports and docks, and operation of offshore oil and gas facilities. The potential for impacts would be largely influenced by site-specific factors, such as the habitat types and distribution in the vicinity of oil and gas activities. Many of the activities associated with oil and gas, such as platform construction, would occur in offshore waters, with minimal impacts on coastal habitats other than for potential accidents.

Routine Operations.

Barrier Landforms. The potential effects on coastal barrier islands, beaches, and dunes from routine operations would primarily be associated with indirect effects from maintenance dredging and vessel traffic. Impacts of pipeline landfalls and use or expansion of coastal facilities could also occur.

Maintenance dredging of navigation channels in barrier inlets and bar channels can remove sediments from the longshore sediment drift. Maintained channels intercept and capture sediments, and dredged materials are often discharged to ocean dump sites. Dredging may contribute to the reduction of sediment deposition and affect the stability of downdrift barrier landforms (MMS 2007b). Reductions in sediment supply could subsequently contribute to minor local losses of adjacent downdrift barrier beach habitat, with impacts over a broader area where the sediment supply is low, such as along the Louisiana coastal barrier islands in the Central Planning Area (CPA). However, dredged sediments are used in beach restoration projects where feasible (MMS 2008a). The installation of erosion control structures, such as jetties, for OCS-related facilities built near barrier shorelines may also accumulate sediments and induce erosion of downdrift areas (MMS 2007b). In some locations, the potential exists for dredging to result in the resuspension and transport of oil spilled during the DWH event.

Service vessel traffic to exploration and production wells could contribute to erosion of barrier beaches. Approximately 300 to 600 vessel trips per week would occur in the GOM under the proposed action. Waves generated by service vessels can erode unprotected shorelines and areas that currently experience barrier beach losses from ongoing shoreline degradation, particularly the coastal areas of Louisiana; vessel traffic can contribute to the accelerated erosion of sediments along beaches through increased wave activity. Erosion from vessel activity along unarmored navigation channels has resulted in channel widening in the Western Planning Area (WPA) and CPA and land loss in some areas. However, restoration and stabilization of channel margins have been effective in minimizing channel widening. Wave activity could be minimized by maintaining reduced vessel speeds in the vicinity of barrier islands.

The proposed action would include approximately less than 12 new pipeline landfalls in the GOM region. Impacts on barrier landforms would likely be avoided during pipeline construction by the use of modern construction techniques, such as directional (trenchless) boring, under barrier islands and beaches (MMS 2008a). These construction methods result in minimal impacts on the barrier systems (Wicker et al. 1989). If nonintrusive techniques were not used, impacts on beach and dune communities from ground-disturbing activities during pipeline construction could occur, with the potential for accelerated beach erosion and island breaching.

Up to 12 new natural gas processing facilities and 4 to 6 new pipe yards would be constructed. No new facilities would be expected to be constructed on barrier beaches or associated dunes; however, impacts on other coastal upland habitats would likely occur. Habitat losses would be minimized if facilities were located in previously disturbed areas. Expansion of existing facilities located on barrier beaches or dunes would result in losses of those habitats. The continued use of facilities that have become located in the barrier beach and dune zone because of ongoing shoreline recession may result in accelerated erosion of those habitats.

Wetlands. The potential effects on wetlands from routine operations would primarily be associated with direct impacts from pipeline emplacement and maintenance and navigation channel maintenance dredging, as well as indirect impacts from decreased water quality (such as from disposal of OCS-related wastes), altered hydrology, and vessel traffic. Impacts from ground-disturbing activities during construction or expansion of support facilities, such as processing facilities and pipeline yards, could also occur.

The construction of pipelines through coastal wetlands could result in direct losses of marsh habitat, depending on avoidance of wetlands in pipeline route selection and the emplacement technique used. The use of directional boring under wetlands during pipeline construction would likely avoid impacts, or result in negligible impacts, on wetlands. Trenching for pipeline emplacement would result in direct impacts on marsh habitat from excavation. Long-term reduction in vegetation productivity above and adjacent to the pipeline, including areas backfilled, would likely occur, with potential losses of wetland habitat, depending on factors such as the success of backfilling, time of year, and duration of construction (Turner et al. 1994; MMS 2007b).

Maintenance dredging of navigation channels would contribute to increased flushing and draining of interior marsh areas by tides and storms, which could result in shifts in species

composition, habitat deterioration, erosion, and wetland loss (LCWCRTF 1998, 2003). Channels alter the hydrology of coastal marshes by affecting the amount, timing, and pathways of water flow (Day et al. 2000a). Hydrologic alterations can result in changes in salinity and inundation, causing a dieback of marsh vegetation and a subsequent loss of substrate and conversion to open water (LCWCRTF 2001; Day et al. 2000a). Saltwater intrusion into brackish and freshwater wetlands further inland could result in mortality of salt-intolerant species and loss of some wetland types such as cypress swamp, or transition of wetland types such as freshwater marsh to brackish and saltmarsh or open water (MMS 2007b). The deposition of dredged material onto adjacent disposal banks could potentially result in a localized and minor contribution to ongoing impacts of disposal banks, such as preventing the effective draining of some adjacent areas, resulting in higher water levels or more prolonged tidal inundation, or restricting the movement of water, along with sediments and nutrients, into other marsh areas (Day et al. 2000a). Impacts on marsh habitats from navigation channels would be expected to be mitigated by the beneficial use of dredged material (MMS 2008a), through the application of dredged material onto marsh surfaces to increase substrate elevations for marsh restoration or creation. Small areas of marsh would likely be lost during dredging by the occasional inadvertent deposition of dredged material, as well as created by material deposition into shallow water (MMS 2007b).

Service vessel traffic to exploration and production wells would contribute to erosion of marsh habitat. Wetland losses would likely occur along unarmored navigation channels because of the widening that would result from the continued erosion of adjacent marsh substrates due to waves generated by vessel traffic (LCWCRTF 2003). Erosion from vessel activity along navigation channels has resulted in channel widening in the WPA and CPA and land loss in some areas. However, restoration and stabilization of channel margins have been effective in minimizing channel widening. Erosion of wetlands would not occur along armored channels, which are frequently used by OCS-related vessel traffic.

The construction or expansion of facilities near the coastline, including the potential expansion of port facilities, could potentially result in the direct loss of wetlands from the placement of fill material during building construction, as well as the construction of pipelines, access roads, and transmission corridors. However, construction in wetlands is discouraged by State and Federal permitting agencies. Indirect impacts of construction could include habitat fragmentation, altered hydrology from changes in surface drainage patterns or isolation of wetland areas from water sources, conversion to upland communities or open water, sedimentation and turbidity, and introduction of contaminants in stormwater runoff. Resulting changes in affected wetlands could include a reduction in biodiversity and the establishment and predominance of invasive plant species. Impacts on wetlands from construction could be minimized by maintaining buffers around wetlands and by using best management practices for erosion and sedimentation control. Construction in wetlands is managed and regulated by the appropriate State agencies and the USACE. It is assumed that standard mitigation measures would be applied to any construction project associated with the Program.

Impacts on wetlands near constructed facilities might also result from other factors, such as disposal of wastes at upland disposal sites, which could introduce contaminants into wetlands. Contaminants from land storage or disposal sites might migrate into groundwater or could be present in stormwater runoff that could flow into wetlands. Contaminants might also be released

to surface water in service vessel discharges, which might affect wetlands. State requirements would be enforced to prevent and address potential occurrences. Impacts on wetlands would be minimized by implementing water quality practices.

Seagrasses. The potential effects on seagrass communities from routine operations would primarily be associated with effects from vessel traffic, pipeline emplacement, and maintenance dredging. Impacts from use or expansion of coastal facilities could also occur.

Coastal seagrass communities might be damaged by vessel traffic outside established traffic routes, which could result in long-term scars on seagrass beds (MMS 2003d). The recovery rate would be greater for larger scars and low-density vegetation. Seagrass communities might also be affected by trenching for pipeline installation, which could bury adjacent seagrasses and deposit lighter sediments onto leaves of more distant seagrasses. Turbidity from pipeline emplacement, maintenance dredging of navigation canals, or vessel traffic might adversely affect seagrass communities by decreasing seagrass cover and productivity, and changing species composition, as a result of reduced light levels (MMS 2007b). It is assumed that the USACE and State agency requirements regarding the mitigation of turbidity impacts on submerged vegetation from pipeline emplacement and maintenance dredging of navigation channels would be followed. Salinity changes resulting from dredging can also result in changes in species composition of seagrass communities. Because activities associated with the Program would be located far from Florida coastal waters, which contain approximately 98.5% of all coastal seagrasses in the U.S. GOM, the Program would be expected to have minimal effects on the overall condition of seagrass communities in the GOM. However, localized impacts on small areas of seagrass could occur in coastal areas west of Florida.

Accidents. The potential effects on coastal and estuarine habitats from accidents would primarily be associated with impacts from spills of oil and other petroleum hydrocarbons, such as fuel oil or diesel fuel, and subsequent cleanup efforts. Large (≥1,000 bbl) and small (<1,000 bbl) oil spills could occur as a result of tanker and barge spills, pipeline spills, or platform spills. Spills from vessels should be minimized by compliance with USCG requirements for spill prevention and control. Section 4.4.2 provides details of spill assumptions. Oil or other spilled materials might be transported to barrier landforms and wetland habitats by currents or tides. The amount of oil deposited on coastal habitats would depend on various factors, such as spill volume, distance from shoreline, ambient conditions, degree of weathering, and effectiveness of response actions. Large spills would potentially result in heavy or widespread deposits of oil.

Beaches could be affected by oil spills, and the direct mortality of biota could result. Spilled oil that reaches barrier beaches might be restricted to beach surfaces, or it could penetrate into subsurface layers. Permeable substrates, generally associated with larger sand grain sizes, and holes created by infauna could increase oil penetration, especially that of light oils and petroleum products (NOAA 2000). Oil may become buried under sediments by wave action. Although beach and foredune areas are often sparsely vegetated, impacts on vegetation might occur if oil was carried to higher elevations by storm waves and tides. Oiled beach sediments could weaken dune and other beach vegetation, resulting in accelerated erosion. Because of the

changes in barrier beach and dune profiles as a result of hurricanes, such as Katrina and Rita, habitat between the shoreline and beach ridge may be more vulnerable to impacts of spills (MMS 2008a).

Impacts on coastal marsh vegetation from oil spills could range from a short-term reduction in photosynthesis to extensive mortality and subsequent loss of marsh habitat as a result of substrate erosion and conversion to open water (Hoff 1995; Proffitt 1998). Vegetation that dies back could recover, even following the death of all existing leaves. Long-term impacts could include reduced stem density, biomass, and growth (Proffitt 1998). Mangroves might decrease canopy cover or die over a period of weeks to months (Hensel et al. 2002; Hayes et al. 1992). Other effects of spills could include a change in plant community composition or the displacement of sensitive species by more tolerant species. In locations where soil microbial communities were affected, effects might be long term, and wetland recovery might be slowed. The degree of impacts on wetlands from spills are related to the oil type and degree of weathering, amount of oil, duration of exposure, season, plant species, percentage of plant surface oiled, substrate type, and oil penetration (Hayes et al. 1992; Hoff 1995; Proffitt 1998; Hensel et al. 2002). Higher mortality and poorer recovery of vegetation generally result from spills of lighter petroleum products (such as diesel fuel), heavy deposits of oil, spills during the active growing period of a plant species, contact with sensitive plant species (especially those located in coastal fresh marsh), completely oiled plants, and deep penetration of oil and accumulation in substrates. Most spills in deepwater areas would require an extended period of time to reach a shoreline or marsh and would undergo natural degradation and dispersion, which, in addition to expected containment actions, would reduce potential impacts. Because of the changes in barrier island profiles as a result of hurricanes Katrina, Rita, and Ivan, there is a greater potential for oil spill impacts on coastal marshes (MMS 2008a).

Impacts on seagrass communities would generally be short term, resulting from contact with oil dispersed in the water column, from reduced light and oxygen levels due to the sustained presence of an oil slick in protected areas, or from reduced populations of epiphyte grazers (MMS 2007b). Recovery would generally occur in about 1 yr. Permanent losses of seagrass habitat would not be expected to occur from a spill unless unusually low tides result in direct contact of seagrass leaf surfaces with an oil slick.

Although any residual oil that might remain on barrier beaches following cleanup could be largely removed in highly exposed locations through wave action, oil could remain in the shallow subsurface for extended periods of time. In some locations, oil might become buried by new sand deposition (NOAA 2000). Natural degradation and persistence of oil on beaches are influenced by the type of oil spilled, the amount present, sand grain size, the degree of penetration into the subsurface, the exposure to the weathering action of waves, and sand movement onto and off the shore. Spilled oil might be entirely absent from affected beaches within a year or less, or it might persist for many years (Dahlin et al. 1994; Hayes et al. 1992; Petrae 1995; Irvine 2000). On sheltered beaches, heavy oiling left for long periods could form an asphalt pavement relatively resistant to weathering (Hayes et al. 1992). Spilled oil remaining in wetlands after cleanup degrades naturally by weathering processes and biodegradation caused by microbial communities in the soil. Full recovery of coastal wetlands might occur in less than 1 yr or might require more than 5 yr, depending on site and spill characteristics (Hoff 1995). Oil

might degrade very slowly in saturated soils under mangroves; more than 30 yr could be required for mangroves to recover (Hensel et al. 2002). Oil could remain in some coastal substrates for decades, even if it was cleaned from the surface. Heavy deposits of oil in sheltered areas or in the supratidal zone could form asphalt pavements resistant to degradation (Hoff 1995).

Spill cleanup operations might adversely affect barrier beaches and dunes if large volumes of contaminated substrates were removed. Such removal could affect beach stability, resulting in accelerated shoreline erosion, especially in areas of sand deficit, such as along the Louisiana coastline in the CPA. However, sand removal is generally minimized during spill cleanup (MMS 2007b). Foot traffic during cleanup might mix surface oil into the subsurface, where it might persist for a longer time. Spill cleanup actions might damage coastal wetlands through trampling of vegetation, incorporation of oil deeper into substrates, increased erosion, and inadvertent removal of plants or sediments, all of which could have long-term effects (Hoff 1995; Proffitt 1998; NOAA 2000). These actions could result in plant mortality and delay or prevent recovery. In locations where spill cleanup would include the excavation and removal of contaminated soils and biota, increased erosion and lowered substrate elevation could result in marsh loss by conversion to open water, unless new sediments were applied. Effective low-impact cleanup actions could include bioremediation, low-pressure flushing, or use of chemical cleaners (Mendelssohn and Lin 2003; Hoff 1995; Proffitt 1998).

Catastrophic Discharge Event. The PEIS analyzes a CDE with an assumed volume of 0.9–7.2 million bbl (Table 4.4.2-2). The amount of oil deposited on coastal habitats would depend on various factors, such as spill volume, distance from shoreline, ambient conditions, degree of weathering, and effectiveness of response actions. A CDE would potentially result in heavy or widespread deposits of oil and would have a greater likelihood for extensive areas of shoreline affected and heavy deposits of oil in multiple locations. For example, the DWH event affected more than 1,046 km (650 mi) of the GOM coastal habitat, from the Mississippi River Delta to the Florida panhandle. More than 209 km (130 mi) of coastal habitat were moderately to heavily oiled, including a substantial number of Louisiana beaches (see Section 3.7.1.1.5).

4.4.6.1.2 Alaska Region – Cook Inlet.

Routine Operations. The potential effects on coastal habitats from routine operations would primarily be associated with direct impacts from ground-disturbing activities during pipeline construction as well as indirect impacts from service vessels and the operation of existing facilities (see Table 4.4.6-2).

Up to one new pipeline landfall would be constructed in the Cook Inlet Planning Area. Pipeline installation would include trench excavation through intertidal and shallow subtidal areas. Installation could directly disturb tidal marshes, beaches, rocky shores, or other coastal habitats, depending on the location of the landfall. A few acres of habitat would likely be altered at each landfall site, and some intertidal and shallow subtidal organisms would be displaced (MMS 2003b). Intertidal and shallow subtidal vegetation could be indirectly impacted by excavation for pipeline installation. Areas adjacent to the trench may be covered by excavated sediments, and organisms could be affected by sedimentation and turbidity associated with the

TABLE 4.4.6-2 Impacting Factors for Coastal and Estuarine Habitats in the Alaska Region – Cook Inlet

	Habitat Type		
Oil and Gas Impacting Factors[a]	Cook Inlet Coastal Habitats	Arctic Barrier Landforms	Arctic Wetlands
Vessel traffic (all phases)	X	X	X
Construction of onshore pipelines (construction)	X		X
Use of existing facilities (operations)	X		X
Disposal of OCS-related wastes (all phases)	X		X
Accidental spills (all phases)	X	X	X

[a] X = Potential impacts on the resource attributable to the impacting factor.

disturbance of bottom sediments during trench excavation and backfilling. Impacts could be reduced by implementing measures to restrict the dispersal of sediments.

Approximately 80–169 km (50–105 mi) of new onshore pipeline would be constructed. Pipelines would deliver oil to existing refineries in Nikiski and natural gas to transmission facilities in the Kenai area, both on the eastern side of Cook Inlet. Indirect effects could include habitat fragmentation, reduced infiltration and increased surface runoff from soil compaction on the construction site, altered hydrology including increased or reduced inundation or saturation of substrates, sedimentation and turbidity, deposition of fugitive dust, and introduction of contaminants in stormwater runoff. Impacts to local streams could affect coastal wetlands. Impacts could result in changes in plant community structure, reduction in plant biodiversity, and the establishment and dominance of invasive plant species. However, activities that may potentially impact wetlands are regulated by State agencies and the USACE. Standard mitigation measures would be applied to any construction project associated with these activities. For example, construction-related impacts could be minimized by maintaining buffers around wetlands and implementing best management practices for erosion and sediment control. Although wetlands along the pipeline route could be affected by construction, impacts could be reduced if pipelines were located in existing utility or transportation system rights-of-way, when possible, and if natural drainage patterns were maintained. Indirect impacts to coastal habitats from sedimentation originating along the pipeline route could be reduced by minimizing crossings of anadromous fish streams and consolidating pipeline crossings with other utility and road crossings.

Construction of a pipeline gravel service road, haul road, and access roads would replace habitat with unvegetated surfaces or result in altered habitat having few species in common with nearby undisturbed habitats. Habitat may also be disturbed by the establishment of work camps. Resulting changes in affected wetlands could include a reduction in biodiversity, replacement of one wetland type for another (such as by dewatering or ponding), conversion to upland communities, or conversion of vegetated wetlands to open water.

No new shore bases, processing facilities, or waste disposal facilities would be constructed. Existing shore bases, gas processing facilities, and waste disposal facilities would be used for all new oil and gas activities in the planning area. Operation of existing facilities could have local indirect effects on wetland vegetation from exhaust emissions or atmospheric releases from processing facilities. Contaminants could be introduced into wetlands from the use of existing waste storage or disposal sites, if contaminants migrate into groundwater or enter stormwater that flows into wetlands. Service vessels would make one to three trips per week for each of the one to three new platforms in the planning area. Discharges from service vessels that support drilling platforms may contain materials that adversely affect coastal wetlands or other intertidal or shallow subtidal habitats. Wetland impacts could be avoided or minimized by implementing practices that eliminate or minimize impacts on water quality.

Accidents. The potential impacts on coastal habitats from accidents would primarily be associated with impacts from spills of oil or other petroleum hydrocarbons, such as fuel oil or diesel fuel, and the methods used for spill cleanup. This analysis assumes 1 large spill of 4,600 bbl from a pipeline or 1,500 bbl from a platform, as well as 2 smaller spills (>50–1,000 bbl) and 10 spills up to 50 bbl. Currents and tides within Cook Inlet could transport oil or other materials to coastal habitats from drilling platforms, pipeline leaks, or vessel accidents. The Cook Inlet Planning Area is unlike any other OCS Planning Area in that it is almost entirely surrounded by coastal habitat. Therefore, there is a very high likelihood that spills in the planning area would make contact with coastal habitats. Because of the patterns of Cook Inlet surface currents, habitats along the western shoreline of the inlet and along Shelikof Strait would have the greatest likelihood of contact from spills within the planning area, while the eastern shoreline would have a lower potential for contamination from spills (MMS 2003a). Extensive winter ice can develop along the western shores of Cook Inlet, and epibiota are seasonally removed by ice scour. Along the Shelikof Strait mainland, intertidal communities are affected by glacier ice melt and are subject to turbidity and freshwater stresses (McCammon et al. 2002).

Intertidal habitats would be highly vulnerable to spills that reach the coastline, and repeated influxes of oil may contaminate intertidal surfaces with each subsequent tidal cycle. Because of the wide tidal range (more than 9 m [30 ft] in some portions of upper Cook Inlet, north of the planning area), extensive areas of shoreline habitat may be affected by a spill, especially soft bottom habitats (sands and muds), which typically have a relatively flat topography. Shallow subtidal habitats could be affected by oil that slumps from intertidal areas and accumulates below the low-tide line.

Vulnerable intertidal habitats sensitive to disturbance from oil spills extend around most of lower Cook Inlet (MMS 2003a). Highly sensitive shoreline habitats include marshes, sheltered tidal flats, and sheltered rocky shores (NOAA 1994). The vulnerability of intertidal habitats is generally rated as highest for vegetated wetlands and semipermeable substrates, such as mud, that are sheltered from wave energy and strong tidal currents. Oil contacting these habitats is less likely to be removed by waves. Cleanup activities are very difficult to conduct on soft mud substrates, such as on tidal flats (NOAA 1994, 2000).

Direct mortality of biota could result from spilled oil contacting intertidal habitats. Oil readily adheres to marsh vegetation (NOAA 1994, 2000; Hayse et al. 1992), and effects may range from a short-term reduction in photosynthesis to extensive vegetation injury or mortality. Many invertebrates are sensitive to oil exposure. Studies of the *Exxon Valdez* oil spill provide valuable information on oil spill effects and recovery. Following the *Exxon Valdez* oil spill, the abundance of many species of algae and invertebrates were reduced at affected sites (NOAA 1997; Peterson 2000; *Exxon Valdez* Oil Spill Trustee Council 2003). In particular, the abundance and reproductive potential of *Fucus gardneri*, a common and important brown alga species, was reduced in oiled areas and remained unstable at some locations for extended periods (*Exxon Valdez* Oil Spill Trustee Council 2003, 2010a). Although adult *Fucus* appear to have some resistance to oil toxicity, earlier life stages appear to be much more sensitive (NOAA 1998). In shallow subtidal habitats, impacts were less severe, although kelp, eelgrass, and many invertebrates were adversely affected (Peterson 2000).

Spilled oil that contacts intertidal habitats can cause changes in community structure and dynamics. Toxic compounds in oil can selectively remove the more sensitive organisms, such as echinoderms and some crustaceans, while organic enrichment from oil can stimulate the growth and abundance of opportunistic infaunal invertebrates, such as some polychaetes and oligochaetes (McCammon et al. 2002). Some opportunistic species, such as species of barnacle, oligochaetes, and filamentous brown algae, colonized affected shorelines following the *Exxon Valdez* oil spill and cleanup (Peterson 2000; *Exxon Valdez* Oil Spill Trustee Council 2003). Indirect effects also included the spread of *Fucus gardneri* onto lower shoreline areas in some regions, which inhibited the return of red algae (Peterson 2000). The reduction of predators or herbivores can also result in changes in lower trophic levels for extended periods. The adverse effects of oil on intertidal organisms, such as macroalgae, clams, and mussels, can last for more than a decade (MMS 2003e; *Exxon Valdez* Oil Spill Trustee Council 2003).

Extended periods of time may be required for intertidal communities to fully recover from an oil spill. The degree of effects and length of recovery depend on a number of factors such as the type of oil, extent of biota exposure, substrate type, degree of sediment contamination, time of year, and species sensitivity (NOAA 1998; Hayse et al. 1992; Hoff 1995). Although the most acutely toxic components of crude oil are rapidly lost through weathering, the more persistent components have been associated with long-term pathologies such as carcenogenicity (NOAA 1997). Full recovery of wetlands including invertebrate communities may require more than 10 years (Hoff 1995). Studies indicate that full recolonization of sheltered rocky shorelines in Cook Inlet may require 5–10 years (Highsmith et al. 2001). Although studies in Prince William Sound indicate that some organisms can recover quickly, recovery in some intertidal and shallow subtidal habitats takes more than a decade (Peterson 2000; *Exxon Valdez* Oil Spill Trustee Council 2003). More than 20 years after the *Exxon Valdez* oil spill, intertidal communities were considered to be recovering, but had not yet fully recovered from the effects of the spill (*Exxon Valdez* Oil Spill Trustee Council 2010a).

Spilled oil may penetrate into subsurface layers or may remain on the surface. Oil can remain in intertidal sediments and organisms for more than a decade and may remain a long-term source of exposure (NOAA 1997; MMS 2003e; Short et al. 2004; *Exxon Valdez* Oil Spill Trustee Council 2003). Lingering oil, in some areas only slightly weathered, persists in intertidal beach

substrates at a number of locations more than 20 years after the *Exxon Valdez* oil spill (*Exxon Valdez* Oil Spill Trustee Council 2009b, 2010a,b). Coarse-grained sand beaches are more conducive to subsurface penetration than fine-grained sands (NOAA 2000), and subsequent deposition of sand may bury oil deposits. Natural removal of subsurface oil from gravel beaches is greatly reduced by surface armoring of boulders, as observed in Prince William Sound (NOAA 1997). Although oil is not likely to adhere to the surface of mudflats, oil may be deposited if concentrations are high; penetration of the surface is unlikely except for entering burrows or crevices (NOAA 2000).

Cleanup activities may also adversely affect intertidal habitats and biota, as occurred following the *Exxon Valdez* oil spill (NOAA 1997; McCammon et al. 2002; *Exxon Valdez* Oil Spill Trustee Council 2003). The removal of organisms from affected surfaces and washing out of fine particles from substrates likely inhibited and slowed the recovery of intertidal communities in some areas. Trampling of vegetation and other biota during cleanup activities as well as working oil deeper into sediments from foot traffic and equipment can also delay recovery from oil spills. Extensive vessel traffic during cleanup operations may increase turbidity and adversely affect organisms, such as eelgrass, in shallow subtidal communities (*Exxon Valdez* Oil Spill Trustee Council 2003).

Catastrophic Discharge Event. For the Cook Inlet Planning Area, the PEIS analyzes a CDE with an assumed volume of 75,000–125,000 bbl (Table 4.4.2-2). Currents and tides within Cook Inlet could transport oil, and there is a very high likelihood that spills in the planning area would make contact with coastal habitats. A CDE would potentially result in heavy or widespread deposits of oil and would have a greater likelihood for extensive areas of shoreline affected and heavy deposits of oil in multiple locations. The degree of effects and length of recovery depend on a number of factors such as the type of oil, extent of biota exposure, substrate type, degree of sediment contamination, time of year, and species sensitivity. More than 20 years after the *Exxon Valdez* oil spill, intertidal communities were considered to be recovering, but had not yet fully recovered from the effects of the spill (*Exxon Valdez* Oil Spill Trustee Council 2010a).

4.4.6.1.3 Alaska – Arctic.

Routine Operations.

Coastal Barrier Beaches. The potential effects on coastal barrier beaches from routine operations would primarily be associated with direct impacts from ground-disturbing activities during pipeline construction and indirect effects from vessel traffic.

No new pipeline landfalls would be constructed in the Arctic region. However, 16–129 km (10–80 mi) of new onshore pipeline would be constructed for the Beaufort Sea, connecting to existing infrastructure on the Arctic Coastal Plain (ACP). Pipeline construction may affect sand beaches and dunes on the margins of lakes and rivers on the ACP, and erosion of sand beaches and dunes adjacent to pipelines could be promoted. Stabilization of dune margins

could be difficult, and establishment of vegetation cover might be slow, possibly resulting in prolonged losses of dune habitat near pipeline routes.

No new shore bases, processing facilities, or waste disposal facilities would be constructed in the Arctic region. Existing shore bases, gas processing facilities, and waste disposal facilities would be used for all new oil and gas activities in the region. Operation of existing facilities could have local indirect effects on vegetation from exhaust emissions or atmospheric releases from processing facilities.

Arctic coastal habitats are exposed to strong wave and sea ice action, and the shoreline is generally unstable and prone to erosion (MMS 2002c; Viereck et al. 1992; Macdonald 1977). Service vessel traffic to exploration and production wells and barge traffic in support of shore bases could contribute to erosion along barrier beaches. Under the proposed action, up to three vessel trips per week would be made to each of the up to five new platforms along the Chukchi Sea and up to four along the Beaufort Sea. Increases in wave activity from vessel traffic could contribute to the removal of sediments along barrier beaches. Wave activity could be minimized by maintaining reduced vessel speeds in the vicinity of barrier islands.

Wetlands. The potential effects on wetlands from routine operations would primarily be associated with direct impacts from ground-disturbing activities during construction of pipelines and roads, as well as the indirect impacts from decreased water and air quality, altered hydrology, and facility maintenance. Wetland losses could result in the localized reduction or loss of wetland functions, such as fish and wildlife habitat, attenuation of flooding and shoreline erosion, and removal of substances that reduce water quality. Avoidance of wetlands during route selection for pipelines or roads might be difficult on the ACP because of the high density of wetlands. Activities that would potentially affect wetlands are regulated by State agencies and the USACE. Standard measures would help mitigate construction-related impacts.

Although no new pipeline landfalls would be constructed in the Arctic region, 16–129 km (10–80 mi) of pipeline would be constructed onshore to transport oil from the Beaufort Sea to existing North Slope pipelines. With a 46-m (150-ft) wide construction ROW, approximately 73–584 ha (180–1,443 ac) of land would be disturbed. A number of wetland types, including wet or moist tundra habitat, lakes, ponds, or marshes (including those occurring within lakes and ponds), could be affected by pipeline construction. Construction of a pipeline gravel workpad (service roadway), haul road, and access roads would replace wetland habitat with unvegetated surfaces or result in upland habitat having few species in common with nearby undisturbed habitats. Because of the high density of wetlands on the coastal plain, wetland habitat expected to constitute a large proportion of the disturbed area would likely be lost, as occurred during the construction of the TAPS (Pamplin 1979; BLM 2002). Construction of buried pipeline segments would affect similar amounts of wetland habitat as a workpad. However, construction of aboveground pipeline segments without a workpad would result in the loss of only small areas of wetland habitat at the locations of the vertical support members. Wetland areas may also be disturbed by the establishment of work camps. Additional impacts of construction could include altered hydrology from changes in surface drainage patterns or isolation of wetland areas from water sources, such as from blocking natural surface flows. Changes in the moisture regime, natural drainage patterns, or snow-drift patterns in adjacent

areas would likely result in thermokarst, with resulting changes in the species composition of plant communities (NRC 2003a). Wetland impacts associated with degraded water quality could include sedimentation and turbidity and introduction of contaminants in stormwater runoff. Resulting changes in affected wetlands could include a reduction in biodiversity, replacement of one wetland type for another (such as by dewatering or ponding), conversion to upland communities, or conversion of vegetated wetlands to open water. Wetlands adjacent to a gravel workpad would be indirectly affected by deposition of airborne dust. Additional wetland habitat may be lost through thermokarst associated with new impoundments and heavy dust accumulations (BLM 2002).

Deposition of fugitive dust can affect plant communities and alter wetland characteristics, primarily by reducing canopy cover and altering species composition (Auerbach et al. 1997; Everett 1980; Walker and Everett 1987). Impacts may include reduced growth and density of vegetation and changes in community composition to more tolerant species. Reductions in plant cover can reduce the insulation of the ground surface, leading to thawing of the underlying ice-rich permafrost (NRC 2003a). Nonvascular species, primarily mosses and lichens, are highly sensitive. The reduction or loss of sphagnum mosses, which are important components of many plant communities on the ACP, can occur in acidic tundra habitat, especially within 10 m (33 ft) of a road (Walker et al. 1987a), potentially contributing to thermokarst. Deposition of dust on snowdrifts along roads promotes earlier melting. Roads and construction/excavation equipment can also provide a means for the introduction and spread of non-native plants and noxious weeds.

The construction of access roads and transmission corridors would likely result in the direct loss of wetlands from the placement of fill material during construction. Additional wetland habitat could be disturbed by other forms of infrastructure such as employee camps, airstrips, and power stations. The construction of these facilities could permanently eliminate wetland habitat within the immediate footprints of the facilities. While this wetland loss would be long term, the areas disturbed represent an extremely small portion of habitat that occurs on the ACP adjacent to the Arctic region. Impacts on wetlands from construction could be minimized by maintaining buffers around lakes and ponds and by using best management practices for erosion and sedimentation control.

The impacts of road construction on the North Slope are often reduced by the restriction of construction activities to the winter months when the ground is frozen and the use of ice roads rather than gravel roads. Although ice roads avoid the permanent loss of habitat associated with gravel roads, they may affect some vegetation communities. Effects may result from delayed melting in spring, damage to plants, plant mortality, and removal of dead material from the canopy (Walker et al. 1987a). Tundra communities generally recover from such effects, however, within several years (MMS 2002c, 2003e). Drier communities, elevated microsites, and tussock tundra are more affected (Pullman et al. 2003), while moist or wet meadow communities are little affected (Payne et al. 2003).

Large amounts of gravel may be required for permanent road construction. On the North Slope, gravel is often extracted from the floodplains of large rivers (Pamplin 1979; BLM 2002). The excavation of gravel from these material sites and the creation of stockpile areas may affect wetland communities on river floodplains. Wetland areas may be modified by gravel excavation

and other mining operations that alter stream channels. Revegetation of the affected area is expected to be relatively rapid, within a few years.

Additional factors, such as reduced air quality, might also affect wetlands because of activities associated with pipeline or platform construction. Exhaust emissions, such as from construction equipment or pump stations, or fugitive dust generated from exposed soils or roadways could have adverse effects on nearby wetland communities.

Existing shore bases, gas processing facilities, and waste disposal facilities would be used for all new oil and gas activities in the region. Operation of existing facilities could have local indirect effects on vegetation from exhaust emissions or atmospheric releases from processing facilities. Contaminants could be introduced into wetlands from the use of existing land storage or disposal sites, if contaminants migrate into groundwater or enter stormwater that flows into wetlands. Contaminants might also be released to surface waters in service vessel discharges, and might subsequently affect wetlands. Impacts on wetlands could be minimized by the implementation of air and water quality practices.

Accidents.

Coastal Barrier Beaches. The potential effects on coastal barrier beaches and dunes from accidents would primarily be associated with impacts from spills of oil and other petroleum hydrocarbons, such as fuel oil or diesel fuel, and subsequent cleanup efforts. Oil or other spilled materials might be transported to barrier island beaches, coastal beaches, or lagoon beaches by currents or tides. Contamination of beaches from platform spills, pipeline spills, or vessel spills could occur. Because platforms in the Chukchi Sea would be at least 40 km (25 mi) from the coastline, platform spills there would have a lower potential for contacting beaches and dunes than spills nearer the coast in the Beaufort Sea, and the point of contact may be a greater distance down the coastline due to longshore currents. Greater weathering of the lighter, more acutely toxic components of crude oil may therefore also occur prior to contact with the coastline. Beach habitat could be affected by oil spills, and the direct mortality of biota could result. Although beach and foredune areas are often sparsely vegetated, impacts on vegetation might occur if oil were carried to higher elevations by storm waves and tides.

Spilled oil that becomes stranded on beaches might occur only on the surface, or it could penetrate into subsurface layers. Permeable substrates, generally associated with larger sand grain sizes, and holes created by infauna could increase oil penetration, especially that of light oils and petroleum products. Penetration into coarse-grained sand beaches may be up to 25 cm (0.8 ft) (NOAA 1994, 2000). Light oils may penetrate peat shores; however, peat resists penetration by heavy oils (NOAA 2000).

Although any residual oil that could remain following cleanup might be largely removed in highly exposed locations through wave action, oil could remain in the shallow subsurface for extended periods of time. In some locations, oil might become buried by new sand or gravel deposition. Natural degradation and persistence of oil on beaches are influenced by the type of oil spilled, amount present, sand grain size, degree of penetration into the subsurface, exposure to

weathering action of waves, and sand movement onto and off shore. Although petroleum-degrading microbial communities are present, biodegradation along arctic coastlines would likely be slow (Prince et al. 2002; Braddock et al. 2003; Braddock et al. 2004) and is limited to only a few months per year. Spilled oil might persist for many years, with continued effects on infauna and potential recovery of infaunal communities. On sheltered beaches, heavy oiling left for long periods could form an asphalt pavement relatively resistant to weathering (Hayes et al. 1992). Lagoon shorelines include low-energy beaches where spilled oil would likely persist for many years. Spilled oil may persist for extended periods on peat shores; however, if cleaned up, it would be expected to persist for less than a decade (Owens and Michel 2003).

Spill cleanup operations might adversely affect beaches and dunes, if the removal of contaminated substrates affects beach stability and results in accelerated shoreline erosion. Vehicular and foot traffic during cleanup could mix surface oil into the subsurface, where it would likely persist for a longer time. Manual cleanup rather than use of heavy equipment would minimize the amount of substrate removed.

Catastrophic Discharge Event. The PEIS analyzes a CDE in the Beaufort Sea of 1.7–3.9 million bbl, and in the Chukchi Sea of 1.4–2.2 million bbl. Oil might be transported to barrier island beaches, coastal beaches, or lagoon beaches by currents or tides, even from a discharge in the Chukchi Sea; however, the point of contact may be a greater distance down the coastline due to longshore currents. Greater weathering of the lighter, more acutely toxic components of crude oil may therefore also occur prior to contact with the coastline. A CDE would potentially result in heavy or widespread deposits of oil and would have a greater likelihood for extensive areas of shoreline affected and heavy deposits of oil in multiple locations. Natural degradation and persistence of oil on beaches are influenced by the amount present, sand grain size, degree of penetration into the subsurface, exposure to weathering action of waves, and sand movement onto and off shore. Spilled oil might persist for many years, with continued effects on infauna and potential recovery of infaunal communities.

Wetlands. The potential effects on wetlands from accidents would primarily be associated with impacts from spills of oil and other petroleum hydrocarbons, such as fuel oil or diesel fuel, and subsequent cleanup efforts. Oil or other spilled materials might be transported from offshore areas to coastal wetlands by currents or tides, and may result from spills involving platforms, pipelines, or service vessels. Because platforms in the Chukchi Sea would be at least 40 km (25 mi) from the coastline, platform spills there would have a lower potential for contacting coastal wetlands than spills nearer the coast in the Beaufort Sea, and the point of contact may be a greater distance down the coastline due to longshore currents. Greater weathering of the lighter, more acutely toxic components of crude oil may therefore also occur prior to contact with the coastline. The potential for impacts on marshes, estuaries, and low-lying tundra would depend on wind and wave conditions, because the rates of abrasion and dispersal of stranded oil by littoral processes are generally low, due to the small tidal range along the arctic coast. Oil may be deposited at higher elevations of marshes, tundra, and river deltas by spring tides or storm surges and would be expected to persist for long periods due to the low rates of dispersion and degradation.

Freshwater wetlands on the ACP could be affected by spills from onshore pipelines. Oil spilled on the ACP could potentially flow into a nearby stream. Vegetation along the path of the spill would be injured or killed, including wetland vegetation along the stream. Oil reaching the arctic coastline may persist for extended periods of time and slow or reduce vegetation recovery. Wetlands in river deltas and estuaries could be affected by oil spilled in upstream areas.

Impacts on wetlands from oil spills could result in extensive injury or mortality of vegetation and invertebrates in or on the substrate. Other effects of spills could include a change in plant community composition or the displacement of sensitive species by more tolerant species. Impacts on soil microbial communities might result in long-term wetland effects, and wetland recovery would likely be slowed. Various factors influence the extent of impacts on wetlands. Impacts would depend on site-specific factors at the location and time of the spill. The degree of impacts is related to the oil type and degree of weathering, the quantity of the spill (lightly or heavily oiled substrates), duration of exposure, season, plant species, percentage of plant surface oiled, substrate type, soil moisture level, and oil penetration into the soil (Hayes et al. 1992; Hoff 1995; NOAA 1994). Higher mortality and poorer recovery of vegetation generally result from spills of lighter petroleum products (such as diesel fuel), heavy deposits of oil, spills during the growing season, contact with sensitive plant species, completely oiled plants, and deep penetration of oil and accumulation in substrates. Oil that reaches the root system would result in high levels of mortality. Vegetation regrowth and recovery are generally better where oil spills occur in flooded areas or on saturated soils, than on unsaturated soils (BLM 2002). Coastal wetlands in sheltered areas, such as bays and lagoons, which are not exposed to strong water circulation or wave activity, would be expected to retain oil longer with longer-lasting effects on biota (Culbertson et al. 2008).

Oil spills on ice or snow in winter would likely be easily cleaned up with little oil remaining; however, spills during other times may be difficult to clean up, and considerable amounts of oil may remain. Following cleanup, the spilled oil remaining degrades naturally by weathering and biodegradation by soil microbial communities. However, biodegradation would likely be slow due to generally cool temperatures and a short growing season. Full recovery of wetlands, including invertebrate communities, might require more than 10 years depending on site and spill characteristics (Hoff 1995; Culbertson et al. 2008). Oil could remain in some wetland substrates for decades, even if it was cleaned from the surface. Heavy deposits of oil in sheltered areas of coastal wetlands or in the supratidal zone could form asphalt pavements resistant to degradation (Hoff 1995; Culbertson et al. 2008).

Spill cleanup actions might damage wetlands through trampling of vegetation, incorporation of oil deeper into substrates, increased erosion, and inadvertent removal of plants or sediments, all of which could have long-term effects (NOAA 1994, 2000; Hoff 1995). These actions could result in plant mortality and delay or prevent recovery. Complete recovery of coastal wetlands disturbed by cleanup activities could take several decades. Effective low-impact cleanup actions could include bioremediation, low-pressure flushing, or use of chemical cleaners.

The NOAA Environmental Sensitivity Index (ESI) shoreline classification system classifies coastal habitats on a scale of 1 to 10, according to habitat sensitivity to spilled oil,

oil-spill retention, and difficulty of cleanup (NOAA 1994). Habitats with high ESI values are given a higher priority for protection. The ESI shoreline classification for the Beaufort and Chukchi Sea coasts includes habitats with high values, such as inundated lowland tundra or salt/brackish-water marshes, both ranked 10 (MMS 2002d, Owens and Michel 2003).

Catastrophic Discharge Event. The PEIS analyzes a CDE in the Beaufort Sea of 1.7–3.9 million bbl, and in the Chukchi Sea of 1.4–2.2 million bbl. Oil or other spilled materials might be transported from offshore areas to coastal wetlands by currents or tides, even from a discharge in the Chukchi Sea; however, the point of contact may be a greater distance down the coastline due to longshore currents. Greater weathering of the lighter, more acutely toxic components of crude oil may therefore also occur prior to contact with the coastline. A CDE would potentially result in heavy or widespread deposits of oil and would have a greater likelihood for extensive areas of shoreline affected and heavy deposits of oil in multiple locations. The potential for impacts on marshes, estuaries, and low-lying tundra would depend on wind and wave conditions. The degree of impacts is related to the degree of weathering, whether substrates are lightly or heavily oiled, duration of exposure, season, plant species, percentage of plant surface oiled, substrate type, soil moisture level, and oil penetration into the soil.

4.4.6.1.4 Conclusion. Routine Program activities in the GOM, Cook Inlet, and the Arctic would result in minor to moderate localized impacts. Although routine operations in the GOM could have impacts on coastal barrier beaches and dunes, primarily as a result of pipeline construction, maintenance dredging of inlets and channels, and vessel traffic, modern methods of pipeline construction could result in minimal beach erosion. Studies have shown few effects of pipeline landfalls and navigation channels on barrier beach stability.

Routine operations in the GOM could have direct impacts on wetlands as a result of direct losses of habitat from construction activities, pipeline landfalls, and channel dredging, and indirect impacts as a result of altered hydrology caused by channel dredging. Construction impacts, while unavoidable, would be mitigated by State and Federal regulations governing construction in wetland areas. Spills could potentially affect both the surface and subsurface of beach and dune substrates in the GOM. Oiled beach sediments could weaken dune and other beach vegetation, resulting in accelerated erosion. Oil spills could have direct impacts on wetlands by weakening and killing vegetation. Weakened wetland vegetation could lead to long-term or permanent loss of wetland areas, particularly in an already stressed environment such as the Mississippi River deltaic plain. Cleanup operations themselves could also affect wetlands.

Routine operations in Cook Inlet could affect coastal habitats as a result of vessel traffic, as well as infrastructure maintenance and repair activities. Direct loss of habitat could occur as a result of damaging habitats during maintenance. Direct losses would be minimized through existing Federal and State environmental review and permitting procedures that would attempt to mitigate impacts through appropriate requirements. Secondary impacts on wetlands could occur from water and air quality degradation. Because the Cook Inlet Planning Area is almost entirely surrounded by coastal habitat, it is likely that a large spill would contact these habitats. Habitats

along the western shoreline have the greatest likelihood of contact based on surface currents in the inlet. Spills could result in changes in community structure and direct loss of habitat.

Routine operations in the Arctic could affect coastal habitats as a result of pipeline construction, gravel mining on floodplains (for pipeline workpads and offshore islands), vessel traffic, and infrastructure maintenance and repair activities. These activities could result in direct loss of habitat by replacing habitat with infrastructure and by damaging habitats during maintenance. These direct losses would be minimized through existing Federal and State environmental review and permitting procedures that would attempt to mitigate impacts through appropriate siting and construction requirements. Secondary impacts on wetlands could occur from water and air quality degradation, ice roads, fugitive dust, and altered drainage caused by pipelines and roads.

A catastrophic discharge event with an assumed volume of 0.9–7.2 million bbl in the GOM would be associated with a loss of well control; a 75,000–125,000 bbl CDE in Cook Inlet would be associated with a loss of well control or pipeline break; a 1.7–3.9 million bbl CDE in the Beaufort Sea or a 1.4–2.1 million bbl CDE in the Chukchi Sea would be associated with a loss of well control. Oil or other spilled materials might be transported from offshore areas to coastal wetlands by currents or tides. The amount of oil deposited on coastal habitats would depend on various factors, such as spill volume, distance from shoreline, ambient conditions, degree of weathering, and effectiveness of response actions. A catastrophic discharge event would potentially result in heavy or widespread deposits of oil and would have a greater likelihood for extensive areas of shoreline affected and heavy deposits of oil in multiple locations. The degree of effects and length of recovery depend on a number of factors such as the type of oil, extent of biota exposure, substrate type, degree of sediment contamination, time of year, and species sensitivity.

4.4.6.2 Marine Benthic Habitats

4.4.6.2.1 Gulf of Mexico.

Soft Sediments.

Routine Operations.

Exploration and Site Development. Impacting factors for the exploration and site development phase are shown in Table 4.4.6-3. The vast majority of marine benthic habitat affected by the Program would be soft sediments. Drilling wells would temporarily reduce habitat quality by generating temporary turbidity and sedimentation for some distance around the disturbed area. It is estimated that 1,000 to 2,100 exploration and delineation wells and 1,300 to 2,600 development and production wells will be drilled in the WPA and CPA. Drilling can occur from fixed platforms, floating platforms, or drillships. The installation of floating or fixed platforms would disturb soft sediment habitat where the legs or mooring structures (anchors and

TABLE 4.4.6-3 Impacting Factors by Phase and Potential Effects on Marine Benthic Habitat in the CPA and WPA of the GOM

Disturbance	Potential Effects[a]
Exploration and Site Development	
Seismic surveys	Noise; localized anchoring disturbance
Anchoring and mooring of platforms, drillships, and seismic survey vessels	Sediment scour; temporary turbidity and sedimentation; localized alteration in sediment grain size and biogeochemical functions
Drilling and production platform placement	Noise; temporary sediment resuspension and turbidity; loss of natural habitat creation of artificial reef
Drilling	Noise; small habitat loss; local alteration of sediment characteristics; temporary turbidity and sedimentation in surrounding areas
Miscellaneous discharges (deck washing; sanitary waste; vessel releases of bilge and ballast water)	Sediment contamination
Solid wastes	Sediment contamination
Discharge of drilling muds/cuttings	Sediment and water column contamination; alteration in sediment granulometry and biogeochemical functions
Pipeline trenching and placement	Noise; long-term loss and degradation of existing benthic habitat; temporary sediment resuspension and turbidity; substrate for growth
Production	
Scour from anchors and the movement of pipelines and mooring structures	Chronic, long-term disturbance of bottom sediments; turbidity
Platform production	Noise; loss of natural habitat creation of artificial reef
Produced water discharge	Sediment contamination
Miscellaneous discharges	Sediment contamination
Solid wastes and debris	Sediment contamination
Decommissioning	
Miscellaneous discharge	Sediment contamination
Solid wastes and debris	Sediment contamination
Platform removal	Explosive noise; temporary turbidity and disturbance of bottom sediments

[a] Colors indicate impact level: white = negligible; blue = minor; yellow = moderate; red = major.

chains) encountered the seabed and where subsea equipment (such as reentry collars and blowout preventers) was installed. Chronic local bottom disturbance would result from subsequent movements of anchors and mooring lines associated with floating production platforms and support vessels. The actual area of seafloor affected by anchoring operations would depend upon water depth, currents, size of the vessels and anchors, and length of anchor chain. The amount of bottom affected by anchored structures would increase with water depth because of the use of larger anchors and longer anchor chains. Anchor scars were detected in a radial pattern up to 3 km (2 mi) from a well located on the GOM continental slope (Continental Shelf Associates, Inc. 2006). Drilling vessels would use either anchors or dynamic positioning to

maintain station. Drilling vessels using dynamic positioning systems rather than anchors would not generate mooring impacts on the seafloor. Exploratory well platforms can be fixed or floating.

Under the proposed action, it is estimated that 200 to 450 new production platforms will be constructed, which is expected to disturb 150 to 2,500 ha (370 to 6,178 ac) of seafloor. Ninety-five percent of these new platforms will be located in water depths less than 200 m (656 ft). In deep water, floating platforms (including those associated with a FPSO system) requiring mooring structures will typically be used, while platforms in more shallow water would likely have legs and not require mooring. Impacts from fixed and floating production platforms would be similar to those described above for the exploration phase.

Under the proposed action, it is estimated that 3,862 to 12,070 km (2,400 to 7,500 mi) of new pipeline would be placed in the CPA and WPA, resulting in disturbance to 2,000 to 11,500 ha (4,942 to 28,417 ac) of seafloor. Up to two FPSO systems could potentially be used in deep water, which would reduce the need for pipelines. In water depths less than 60 m (197 ft), pipelines must be buried; benthic organisms within the trenched corridor could be killed or injured and organisms to either side of the pipeline could be buried by sediments. Pipelines placed on the sediment surface would permanently replace the existing soft sediments with man-made substrate that sessile invertebrates may colonize over time. Vessel anchoring during pipeline placement would also disturb soft sediment. Anchor and mooring impacts from pipeline placement vessels would be eliminated if dynamic positioning systems rather than anchors were used during pipeline placement. The recovery period for soft sediment benthic habitat disturbed by pipeline placement would depend on factors such as water depth, sediment type, and community composition. Disturbed sediments with a greater proportion of sand to mud may fill in with fine silty material, which would alter grain size and potentially inhibit the colonization by species that existed prior to the disturbance.

During the exploration and development phase, drill cuttings and drilling muds (including synthetic drilling fluids adhering to the cuttings) could contaminate and alter the grain size of sediments immediately around the wellhead and below the discharge area. Drilling wastes are regulated by the USEPA under NPDES permits and can be discharged into the ocean only if they meet USEPA toxicity and discharge rate requirements. These requirements greatly reduce the potential for sediment contamination. Drill cuttings and muds rapidly reach the sediment surface. Therefore, the discharged drilling muds and cuttings could be deposited in highly concentrated thick layers if deposited in shallow water or near the sediment surface. In the case of near-surface discharge in deep water, drilling muds would spread out in a thin veneer over a wide area. Settled muds could cause smothering of organisms, changes in sediment characteristics and biogeochemical functions, and the loss of food resources in the immediate area. The biodegradable synthetic drilling fluids attached to the drilling waste may deplete oxygen (Trannum et al. 2010) and therefore may create local sediment anoxia.

Studies at multiple sites on the Louisiana continental shelf and slope provide the most relevant information on the potential ecological effects of drilling and drilling mud discharges on soft sediment habitat. These studies found drill cuttings were detectable up to 1 km (0.6 mi) from the well site, depending on whether cuttings were discharged near the water surface or near

the bottom (Continental Shelf Associates Inc. 2004, 2006). Concentrations of barium, hydrocarbons, and synthetic drilling fluids in the sediment were patchily distributed within the sampling radius (up to 500 m [1,640 ft] from the well) but, overall, were higher than at the control sites (Continental Shelf Associates Inc. 2004, 2006). Several other alterations in habitat were also detected, including anoxic bottom patches, elevated metal concentrations, coarser grain size (all typically less than 300 m [984 ft] from well), and anchor scars (up to 3 km [1.9 mi] from well). Within 250 m (820 ft) of the well, sediment toxicity to certain invertebrates based on bioassays was also reported at several sites, and metrics of invertebrate community health were lower and more variable (Continental Shelf Associates Inc. 2004). However, a greater abundance of certain species of mieofauna, macrofauna, and fish compared to controls was also detected, potentially because of the organic enrichment of sediments near the well (Continental Shelf Associates Inc. 2006). The spatial extent of the biological, physical, and chemical effects cannot be precisely determined, but drilling discharges, hydrocarbons, and sediment toxicity all dropped off rapidly with distance from the well (Continental Shelf Associates Inc. 2004, 2006). Habitat recovery time is also unknown, but evidence for biological, physical, and chemical recovery was detected after 1 yr, so full recovery may occur over several years as sediment contaminants are biodegraded and buried by natural deposition and bioturbation (Continental Shelf Associates Inc. 2004, 2006).

Miscellaneous discharges (deck washing, sanitary waste, and vessel discharge) also have the potential to disturb soft sediment habitats. Miscellaneous discharges could contaminate sediments if discharged in relatively shallow water. However, contaminants in surface discharges would most likely be diluted to negligible concentrations before reaching the sediment, especially for platforms located in deep water. Many vessel and platform wastes are disposed of on land, and those that are discharged at sea must meet USEPA and/or USCG regulatory requirements that limit their environmental effects.

Noise from seismic surveys and drilling could kill or injure organisms close enough to the noise source and reduce habitat suitability because some species would avoid the area. The severity and duration of noise would vary with site and development scenario, but overall the impacts would be temporary and localized with overall minimal effects on soft sediment habitat. See Section 4.4.7 for detailed discussions of the effects of noise and different categories of biota.

Overall, site development and exploration represents a moderate, but localized, long-term disturbance, with the severity of the impacts generally decreasing dramatically with distance from the well site.

<u>Production.</u> Production activities that could affect soft sediment habitat are shown in Table 4.4.6-3 and include operational noise, miscellaneous discharges, bottom disturbance from the movement of anchors and mooring structures, and the releases of process water. In addition, the platform would replace existing featureless soft sediments and serve as an artificial reef. The potential impacts of miscellaneous discharges would continue on from the exploration and development phase and are described above. Impacts on soft sediment habitats from vessel and operational noise are expected to be negligible, but long term, with the impacts lasting the duration of the production phase.

Chronic bottom disturbance from the movement of anchors and chains associated with platforms and support vessels would affect soft sediment habitats as described above for the exploration and site development phase. Pipelines in water less than 60 m (197 ft) must be buried, which would reduce the potential for pipeline movement. However, pipelines could become unearthed or moved following severe storms. These disturbances would be long term and chronic and cause scour, turbidity, and sedimentation of soft sediment habitats.

The platforms and pipelines would also create novel hard substrate, and the area on and immediately around the platform would have habitat functions and biological communities very different from these in the preconstruction period. Algae and sessile invertebrates would attach to the platform and would in turn attract reef-oriented organisms. The ecological function and value of artificial reef habitat are controversial as some species may benefit while others do not. In addition, sediment grain size and the biogeochemical processes around the platform could be altered by the flux of biogenic material from the platform to the seafloor. For example, an increase in shell material and organic matter would likely result along with a transition to benthic species adapted to these conditions (Montagna et al. 2002). The replacement of soft sediment with artificial reef would exist only during the production phase, unless the platform was permitted to remain in place after decommissioning. In deep sea soft sediment, communities may form on mooring structures, but colonization would likely be slow, and mooring structures would be completely removed during decommissioning, so impacts, if any, would be temporary.

Produced water is a normal product of oil and gas extraction that contains contaminants such as polycyclic aromatic hydrocarbons (PAHs) and heavy metals and therefore represents a potential source of contamination to benthic habitats. Before being discharged into the ocean, produced water is typically treated and must meet NPDES requirements regarding discharge rate, contaminant concentration, and toxicity, thereby reducing the potential for sediment contamination. In addition, contaminants in produced water would be rapidly diluted with distance from the discharge point and are expected to reach sediments only in biologically negligible concentrations. A major study of produced water discharges across the northern GOM indicated that despite the large volume discharged, the contribution of produced water to bottom water hypoxia is minimal when compared to riverine inputs (Bierman et al. 2007). Overall, produced water did not make a significant contribution to the hypoxic zone (Rabalais 2005).

The results of the GOM Offshore Monitoring Experiment funded by BOEM provide a good summary of the long-term changes to soft sediment habitats resulting from oil and gas development (Kennicutt et al. 1995). For the study, stations at 30–50, 100, 200, 500, and 3,000 m (98–164, 328, 656, 1,640, and 9,842 ft) distances from petroleum wells were sampled in a radial pattern surrounding the platforms. Elevated sediment concentrations of sand, organic matter, hydrocarbons, and metals were generally restricted to sediments less than 200 m (656 ft) from the platforms. PAH levels in sediments were well below levels considered to be toxic to invertebrates, and no significant hydrocarbon bioaccumulation was observed in megafaunal invertebrates near platforms. However, metal levels in invertebrate tissues were higher at the study sites (Kennicutt et al. 1995). The physical and chemical changes to sediments near the platforms were enough to alter the soft sediment communities, but the effects were restricted to within 200 m (656 ft) of the platforms. Overall, the authors concluded that oil and gas

development and production resulted in moderate, highly localized changes to soft sediment habitat (Montagna and Harper 1996).

Decommissioning. Miscellaneous discharges and solid waste releases discussed above would continue during the decommissioning phase (Table 4.4.6-3). Platform and mooring structure removal activities could result in increased turbidity, temporary suspension of bottom sediments, and explosive shock-wave impacts. Impacts from decommissioning will vary with platform removal scenario, which ranges from complete to partial removal. The impacts from the explosive removals of the platforms would be attenuated by the movement of the shock wave through the seabed, because the charges typically would be set at 5 m (16 ft) below the seafloor surface. Under the proposed action, it is assumed that a total of 150 to 275 platforms would be removed using explosives. A small area would be disturbed, compared with total seafloor area in the entire GOM. In addition, because soft-bottom benthic habitats are typically recolonized relatively quickly following disturbances, benthic communities in disturbed areas would be expected to recover over a period of months to years without mitigation. If the platform is toppled and left in place, the remains would serve as hard bottom habitat that would permanently replace the existing soft sediment habitat. Artificial reefs provide habitat to fish, algae, and invertebrates; however, their ecological and population effects are controversial. Overall, impacts on soft sediment resources from decommissioning activities are expected to be negligible.

Accidents. Accidental hydrocarbon releases in marine habitat can occur at the surface from tankers or platforms or at the seafloor from the wellhead or pipelines. Natural gas would quickly rise above the sediment surface, which would minimize its impacts on benthic habitat. Natural gas is also less persistent in the environment than oil. Evidence from the DWH event indicates that methane gas released from the well was rapidly broken down by bacterial action with little oxygen drawdown (Camilli et al. 2010; Kessler et al. 2011). Consequently, the remainder of the discussion focuses on oil spills. It is assumed that up to 8 large spills (≥1,000 bbl), up to 70 spills between 50 and 999 bbl, and up to 400 smaller spills between 1 and 50 bbl could occur during the lease period under the proposed action (Table 4.4.2-1). Modeling indicates that oil spilled at the surface could mix to a depth of 20 m (66 ft) at highly diluted concentrations (MMS 2008a). Therefore, most surface spills would likely reach the sediment at biologically negligible concentrations. Most subsea spills would be minor, and the hydrocarbon concentrations would typically be diluted to background levels within a few hundred meters to a few kilometers of the spill site. The soft sediment habitat would recover without mitigation because of natural breakdown of the oil, sediment movement by currents, and reworking by benthic fauna.

Oil spill-response activities such as burning, skimming, and chemical release (e.g., dispersants or coagulants) could affect benthic habitat and biota. Skimming and burning could kill pelagic live stages of benthic biota. The chemicals used during a spill response are toxic, but there is controversy about whether the combination of oil and dispersant is more toxic than oil alone (NRC 2005b; Fingas 2008; Holland-Bartels and Kolak 2011). The use of dispersant would likely reduce oiling of nearshore benthic habitat, but may increase the exposure of subtidal benthic habitat and biota to toxic fractions of oil (NRC 2005b). In shallow water, the presence of, and noise generated by, oil spill-response equipment and support vessels could

temporarily disturb benthic habitat in the vicinity of the response action, potentially reducing habitat use or disturbing migration. As with the spill itself, the location and time of the year the cleanup occurs would be an important determinant of impacts on benthic habitat and biota.

Catastrophic Discharge Event. The PEIS analyzes a CDE up to 7.2 million bbl (Table 4.4.2-2). Lethal or sublethal concentrations of hydrocarbons or mixtures of hydrocarbon and dispersant (if used) could accumulate in soft sediments, reducing habitat function. The magnitude of the impact depends primarily on the location of the well, the volume released, and the speed at which the well is capped. Typically oil rises from the seafloor to the surface, forming a surface slick. However, a subsurface plume capable of traveling long distances could form if dispersants are used or if the well releases a mixture of oil and gas. However, even in the case of a subsurface plume, most oil would stay above the sediment. Sediment contamination could occur from the deposition of oiled sediment and organic matter (dead plankton and organic flocculants) falling from the water column. Such deposition is expected to decrease significantly with distance from the well.

Benthic habitat would probably recover more quickly from a shallow-water spill than from a deepwater spill because of the greater microbial activity and potential for sediment resuspension in shallow water, which would facilitate the breakdown of hydrocarbons. Because of the widespread presence of soft-bottom habitats on the continental shelf and slope and the tendency of oil to stay suspended above the sediment, it is anticipated that impacts from oil spills would affect only a very small proportion of such habitat within the GOM. Oiled sediments would eventually recover their habitat value as hydrocarbons broke down or were buried by natural processes, and communities would soon recover through larval recruitment from adjacent areas. However, recovery time would vary with local conditions and the degree of oiling. Overall, impacts on soft sediment habitat from accidents could be moderate and potentially long term, but no permanent degradation of soft sediment habitat is expected to result from accidental spills.

Warm Water Coral Reefs and Hard-Bottom Habitat.

Routine Operations. BOEM has several protections in place to minimize and mitigate the adverse effects of oil and gas exploration and development on coral reefs and hard-bottom habitat. It is assumed that these current protections will also be implemented during this Program. The mitigations as described in the Topographic Features Stipulation and NTL No. 2009-G39 (available at http://www.gomr.boemre.gov/homepg/regulate/regs/ntls/2009NTLs/09-G39.pdf) create avoidance and mitigation requirements for biologically sensitive hard bottom areas and topographic features in waters 300 m (984 ft) or less.

Four hard bottom or reef habitats are designated for the various protections: (1) banks offshore of Texas and Louisiana (including the Flower Garden Banks National Marine Sanctuary [FGBNMS]), (2) the Pinnacle Trend off the Louisiana-Alabama coast, (3) seagrass and low-relief live-bottom areas primarily located in the CPA and Eastern Planning Area (EPA), and (4) potentially sensitive biological features of moderate to high relief that are not protected by (1) and (2). These protections are explained in greater detail below.

Exploration and Site Development. *Topographic features (banks).* Because FGBNMS is a national sanctuary, no oil and gas exploration or site development would be allowed there. To protect other hard-bottom topographic features, BOEM instituted a Topographic Features Stipulation that established No Activity Zones prohibiting structures, drilling rigs, pipelines, and anchoring around 22 underwater topographic features out to a specified isobaths (typically 85 m [279 ft]) (Table 4.4.6-3). The continuation of this same practice is assumed here. To limit impacts from drilling discharges, the stipulation also requires all drilling muds and cuttings be shunted to within 10 m (33 ft) of the seafloor at distances ranging from 1 to 6.4 km (0.6 to 4 mi) away from topographic features depending on their nature and biological sensitivity. This shunting protects biota by confining the effluent to a level deeper than that of the living components of a high-relief topographic feature. For low-relief banks in the WPA, shunting drilling effluents is not required because it would put the potentially harmful drilling muds and cuttings in the same water depth range as the topographic features. In addition, NTL No. 2009-G39 prohibits bottom-disturbing activities, including the use of anchors, chains, cables, and wire ropes within 152 m (500 ft) of a No Activity Zone without first consulting NOAA. Maps of the protected banks in the WPA and CPA are available at http://www.gomr.mms.gov/homepg/lsesale/topo_features_package.pdf.

Ninety five percent of the 200 to 450 anticipated new production platforms would be located in water depths less than 200 m (656 ft), which is within the depth range at which coral reefs and live-bottom features are found. Turbidity and sedimentation from bottom disturbance and the discharge of drilling wastes can adversely affect coral in multiple ways, including mortality, decreased growth, and loss of xoozanthelle (Thompson et al. 1980; Nugues and Roberts 2003; Fabricius 2005). The protections described above would minimize the impacts from direct bottom disturbance and sediment resuspension to designated banks from anchoring, drilling, platform placement, and pipeline trenching and placement. It is possible but not likely that turbidity would affect hard-bottom habitat if bottom disturbance occurred near the boundary of a No Activity Zone. The shunting requirements should minimize the adverse effects of discharged drilling muds and cuttings, although low-relief banks in more shallow water may be adversely affected to some degree. The topographic feature stipulations have been very effective in protecting the communities associated with topographic features. For example, despite the proximity of oil and gas development activities, long-term monitoring studies do not indicate any significant detrimental impact on the coral reefs of the FGBNMS (Gittings 1998).

Pinnacle trend. The Live-Bottom/Pinnacle Trend Stipulation, which currently applies to certain blocks in the CPA and EPA, requires a biological interpretation of bathymetric and geophysical surveys to determine the distribution of pinnacle features before any bottom-disturbing activities can occur. Also, NTL No. 2009-G39 currently requires consultation with NOAA before any bottom-disturbing activities (including those caused by pipelines, anchors, chains, cables, or wire ropes) planned within 30 m (100 ft) bottoms/pinnacles with vertical relief of 2.4 m (8 ft) or more. There are no specific measures requiring drilling muds and cuttings to be discharged near the seafloor, because modeling studies suggest that the discharge would be transported over the pinnacles (Continental Shelf Associates, Inc. and Texas A&M 2001). Limitations on drilling mud discharges required by NPDES permit and the fact that the pinnacle trend area is subject to high levels of natural turbidity and sedimentation should limit impacts on pinnacle features. If it is determined that the live-bottoms might be adversely affected by the

proposed activity, BOEM can further require economically, environmentally, and technically feasible measures to protect the pinnacle area. These measures may include, but are not limited to, the relocation of operations and monitoring to assess the impact of the activity on the live-bottoms. See the BOEM Web site at http://www.gomr.mms.gov/homepg/regulate/environ/topoblocks.pdf for the list and http://www.gomr.mms.gov/homepg/regulate/environ/topomap.pdf for the map of the identified pinnacle trend features.

Continued implementation of the Live-Bottom/Pinnacle Trend Stipulations and the requirements in NTL No. 2009-G39 would minimize bottom disturbance within 30 m (100 ft) of the majority of known pinnacle features. Because of these protections, direct effects such as benthic habitat disturbance from drilling, platform placement, trenching, and placement of pipelines would be minimal. However, if these activities occurred in the vicinity of the pinnacles, then sedimentation and turbidity could kill or inhibit respiration, filter feeding, and photosynthesis by hard-bottom biota. Because of the lower vertical relief pinnacles, the effects of turbidity and sedimentation could be greater in their vicinity. In addition, noise from seismic surveys, construction, and drilling could injure, kill, or cause avoidance behavior in organisms within a certain distance from the noise source. Noise disturbance would be temporary and the community would recover if the initial impact did not result in major injury or mortality to organisms associated with a pinnacle trend.

Impacts from drilling discharges would be reduced by compliance with the Pinnacle Trend/Live-Bottom Stipulation, NPDES permit restrictions that limit the amounts and types of drilling discharges and the depth at which the pinnacles are located. However, studies in the pinnacle region indicated that discharges of drilling muds may reach background levels within 1,500 m (4,921 ft) of the discharge point (Shinn et al. 1993). Therefore, pinnacles could be affected by discharges occurring at the surface and outside of the 30-m (98-ft) buffer required by NTL-2009-G39. As described above, increased turbidity and sediment deposition from discharges of muds and cuttings in the vicinity of pinnacles may reduce habitat quality and ecological function. However, biota associated with live-bottom/pinnacle features are usually adapted to life in somewhat turbid conditions and are often observed coated with a sediment veneer (Continental Shelf Associates, Inc. and Texas A&M 2001). The existing bottom currents would also prevent the accumulation of large amounts of mud and cuttings. Documentation of an exploratory well adjacent to hard-bottoms in the pinnacle trend at a depth of 103 m (338 ft), 15 months after drilling, showed cuttings and other debris covering an area of approximately 0.6 ha (1.5 ac) (Shinn et al. 1993), but the hard-bottom feature was still found to support a diverse community, including gorgonians, sponges, ahermatypic stony corals, and antipatharians. If turbidity and sediment deposition did result in extensive damage, existing studies suggest that recovery could take years (Continental Shelf Associates, Inc. and Texas A&M 2001).

Pinnacles not detected may be subject to direct damage from construction activities and discharges during site exploration and development. Previously undiscovered pinnacle features are also protected by the Potentially Sensitive Biological Features component of NTL No. 2009-G39. To minimize impacts on unmapped pinnacle features, the BOEM also supports investigations through its Environmental Studies Program to locate hard- and live-bottom features and to understand their ecologies (Continental Shelf Associates, Inc. and Texas A&M University 2001). The BOEM updates regulations and mitigations based on the data from these

studies and from the biological interpretations of geophysical surveys, which reduces the risk of accidental damage.

Live-bottom (low-relief) features (CPA and EPA) and potentially sensitive biological features. NTL No. 2009-G39 and the Live-Bottom (Low-Relief) Stipulation pertains to seagrass communities and low-relief hard-bottom reef within the GOM EPA blocks in water depths of 100 m (328 ft) or less and portions of Pensacola Area Blocks and Destin Dome Area Blocks in the CPA. NTL No. 2009-G39 also covers potentially sensitive biological features, which are features of moderate to high relief (about 2.4 m [8 ft] or higher) that provide habitat but are not protected by a biological lease stipulation.

NTL No. 2009-G39 requires that no bottom-disturbing activities (including drilling, platform placement, or the use of anchors, chains, cables, or wire ropes) may cause impacts on live-bottoms (low-relief features) or potentially sensitive biological communities. It is also required that any exploration or development activity planned within 30 m (100 ft) of either must be reviewed by BOEM. If it is determined that these habitats might be adversely affected by the proposed activity, then BOEM will require measures that may include, but are not limited to, relocation of operations, shunting of all drilling fluids and cuttings to avoid live-bottom areas, and monitoring to assess the adequacy of any mitigating measures. For further information on the live-bottom (low-relief) area stipulation and the protections for potentially sensitive biological features in the GOM, see NTL No. 2009-G39.

Overall, the protections in NTL No. 2009-G39 should minimize the potential for direct disturbance to coral reefs and live-bottom habitat. However, sediment disturbance and the discharge of drilling muds and cuttings in nearby areas could result in turbidity and sedimentation around these features that could kill or inhibit respiration, filter feeding, and photosynthesis by hard-bottom biota. Because of their generally shallow depth, low-relief habitats are particularly vulnerable to turbidity and sedimentation. In addition, low-relief live-bottom areas and potentially sensitive biological features not detected would be subject to direct mechanical damage from site exploration and development activities. Thus, appropriately siting discharge locations in pre-disturbance mitigation plans would be critical in minimizing the effects of bottom disturbance and discharges. NTL No. 2009-G39 states that the developer must provide a map showing the activity, structures, and maximum area of disturbance in relation to the feature. Such mapping would minimize impacts on these habitats and minimize the chance of disturbing as-yet-unmapped features.

Overall, impacts on coral reef and live-bottom habitat from exploration and site development activities should be minimized by existing protections. However, low-relief or small, isolated, unmapped live-bottom habitat could be affected by direct mechanical damage and turbidity and sedimentation. Given the frequent natural bottom disturbance that occurs in the GOM shelf, coral reef and live-bottom communities should be resistant to some extent to the adverse physiological impacts from periodic sedimentation. Live-bottom and coral reef habitat should recover, if they are adversely affected by exploration and site development activities. Recovery could be short term to long term depending on the extent and nature of the impact, species affected, and the suitability for recolonization of the habitat affected.

Production. Impacts on hard-bottom and coral reef habitat during the production phase could result from miscellaneous discharges, the movement of vessel anchors and mooring structures, produced water discharge, and the creation of artificial reef habitat (Table 4.4.6-3). Turbidity and sedimentation generated by chronic movement of anchors could affect coral reefs and hard-bottom habitat if they were located close enough to the disturbance. Impacts on coral and hard-bottom habitat from bottom disturbance would be minimized by existing mitigation measures.

Ninety-five percent of the 200 to 450 anticipated new production platforms would be located on the continental shelf. Algae and sessile invertebrates would rapidly colonize the platform and pipelines and would also attract mobile reef-oriented organisms. Thus, platforms would provide new hard-bottom habitat for a variety of species. However, oil and gas production platforms have been implicated in promoting the establishment of new species through natural range expansion or by providing suitable habitat for introduced exotic species (Sammarco et al. 2004; Page et al. 2006; Hickerson et al. 2008). Introduced species could displace native species and in doing so alter the ecological function of existing hard-bottom and coral habitat. For example, oil and gas platforms may have expedited the establishment of several exotic species on the FGBNMS including sergeant majors (*Abudefduf saxatilis*), yellowtail snapper (*Ocyurus chrysurus*), and orange cup coral (*Tubastraea coccinea*) (Hickerson et al. 2008). It is likely that these species would have spread even without the platforms, although the platforms may have expedited the process. If floating platforms with moorings are used, organisms could colonize mooring structures. Thus the overall benthic footprint may be small depending on the design. Also, in deep sea areas, most platforms and mooring structures would likely be completely removed during decommissioning, so impacts, if any, would be temporary.

Produced water discharges could introduce petroleum hydrocarbons and metals into hard-bottom habitat. However, impacts would be minimized by discharge and toxicity limitations imposed by NPDES permits, as well as restrictions that prevent the placement of oil and gas platforms in the immediate vicinity of these habitats. In addition, the depth of many of the coral reef and hard-bottom habitats, the prevailing current speeds, and the offsets of the discharges from these habitats would substantially dilute produced waters before they could come in contact with sensitive biological communities. As a result, the impact of produced water discharges is expected to be minor.

Decommissioning. Coral reefs are not likely to be affected by platform removal because of existing stipulations. Hard-bottom habitat could be adversely affected by explosive platform removal (estimated 150 to 275), which could cause turbidity and sedimentation in nearby hard-bottom habitat. Deposition of suspended sediments could smother and kill the filter-feeding sessile animals that inhabit much of the hard-bottom habitat. Explosive impacts on large topographic features covered by the No Activity Zone Stipulations would be minimized because of their distance from the seafloor and the existing stipulations precluding the placement of structures on or near these communities. However, hard-bottom features located closer to production platforms may be more susceptible to damage. In the event that live-bottom areas were affected during removal of existing platforms, recovery times would vary with damage and species.

Pipelines on the surface of the seafloor that are left in place would continue to provide hard substrate of structure-oriented organisms. In addition, many of the decommissioned platforms will be converted into artificial reefs. By acting as stepping stones across the GOM, oil platforms have been implicated in the introduction of a non-native coral species (*Tubastraea coccinea*) and fishes such as sergeant majors (*Abudefduf saxatilis*) and yellowtail snapper (*Ocyurus chrysurus*) into the FGB (Hickerson et al. 2008).

Accidents. Accidental spills in the CPA and WPA could affect hard-bottom and coral reef habitat from south Texas to the west Florida shelf in the EPA. Accidental hydrocarbon releases in marine habitat can occur at the surface or at the seafloor. Natural gas would quickly rise above the sediment surface, which would minimize its impacts on benthic habitat, although natural gas could temporarily reduce the habitat quality of high-relief benthic features. Natural gas is also less persistent in the environment than oil. Evidence from the DWH event indicates that methane gas released from the well was rapidly broken down by bacterial action with little oxygen drawdown (Camilli et al. 2010; Kessler et al. 2011). Consequently, the remainder of the discussion focuses on oil spills.

It is assumed that up to 8 large spills (≥1,000 bbl), up to 70 spills between 50 and 999 bbl, and up to 400 smaller spills between 1 and <50 bbl could occur during the lease period under the proposed action (Table 4.4.2-1). Most spills would be small and occur at the surface from the platform or vessels or at the seafloor from pipeline leaks. Oil from surface spills can sometimes penetrate the water column to documented depths of 20 m (66 ft) or more, which is within the depth range of the crests of some coral reefs and topographic features including the FGBNMS. However, at these depths, the concentrations of the various chemical components of spilled oil are typically several orders of magnitude lower than those demonstrated to have an effect on marine organisms (MMS 2008a). Therefore, it is likely that only low concentrations of oil from surface spills would reach the sensitive benthic habitats (MMS 2008a). Small subsurface spills could rise and come into contact with corals and hard-bottom habitat. Offshore banks are less likely to be affected because of the No Activity Zone stipulation that would create a large buffer between the banks and oil and gas development and production activities. A buffer of only 30 m (98 ft) applies to most hard-bottom areas and therefore low-relief, hard-bottoms could be contacted by small subsurface oil spills. However, because rapid dilution would occur as spilled oil was transported by currents and rose toward the water surface, subsurface oil spills would likely have to come into contact with a topographic feature almost immediately to have detrimental effects on the associated community. Consequently, the risk of a most accidental oil spills to these communities is relatively small.

Catastrophic Discharge Event. The PEIS analyzes a CDE up to 7.2 million bbl (Table 4.4.2-2). A CDE oil spill from a pipeline rupture, a loss of well control, or a tanker associated with a FPSO system could degrade coral reef and hard-bottom habitat if it came into contact with large quantities of oil as it moved through the water column. Hydrocarbons have been shown to have lethal and sublethal (reproduction, larval settlement, photosynthesis, and feeding) effects on corals, although no effects on corals following oil spills are also frequently reported (Loya and Rinkevich 1980; Bak 1987; Guzman et al. 1991; Dodge et al. 1995; Haapkyla et al. 2007). Water currents moving around the banks would tend to carry oil around the banks rather than directly over the features, thereby lessening the severity of the impact

(Rezak et al. 1983). Corals have the capacity to recover quickly from hydrocarbon exposure. For example, Knap et al. (1985) found that when *Diploria strigosa*, a common massive brain coral at the Flower Garden Banks, was dosed with oil, it rapidly exhibited sublethal effects but also recovered quickly. However, larval stages of coral are far more sensitive than adults. Therefore, the impact magnitude of a spill is partly dependent on whether the spill occurs during a period of coral spawning.

If dispersants were used or if oil released from the wellhead had a high ratio of gas, a subsurface hydrocarbon plume covering a large area could form, which would increase the potential for contact with hard-bottom and coral reef habitat. The effect of chemically dispersed oil on corals is equivocal, with some studies finding large effects of oil and dispersant mixtures on corals and others finding only minor effects (Dodge et al. 1984; Wyers et al. 1986; Epstein et al. 2000; Haapkvla et al. 2007; Shafir et al. 2007). If used, dispersants may slow the natural breakdown of oil, resulting in persistent toxicity. In most cases, effects on sensitive biota would be sublethal, with recovery occurring within months to a few years (MMS 2002a). For lethal exposures, the community would likely recover once the area had been cleared of oil, although full recovery could take many years (Haapkvla et al. 2007). Consequently, it is anticipated that impacts of lethal concentrations of oil reaching coral reef or hard-bottom habitat would be long term but temporary.

Deepwater Corals and Chemosynthetic Communities.

Routine Operations.

Exploration and Site Development. In the GOM, both deepwater coral and chemosynthetic communities are currently protected under NTL No. 2009-G40 (available at http://www.gomr.boemre.gov/homepg/regulate/regs/netls/2009NTLs/09-G40.pdf), which covers all high-density deepwater communities (HDDC) in depths 300 m (984 ft) or greater. Impacts on deepwater corals and chemosynthetic communities (HDDC) from exploration and site development could potentially occur during platform and pipeline placement, the discharge of drilling muds and cuttings, and miscellaneous discharges (Table 4.4.6-3). NTL No. 2009-G40 (MMS 2010b) currently prohibits the discharge of drilling muds and cuttings within 610 m (2,000 ft) of HDDC. In addition, NTL No. 2009-G40 requires that all proposed seafloor disturbances (including those caused by anchors, anchor chains, wire ropes, seafloor template installation, and pipeline construction) must be maintained at a distance of at least 76 m (250 ft) from HDDC habitat. In addition, any seafloor disturbances planned within 152 m (500 ft) of a high-density deepwater coral community must be reviewed and approved by BOEM, and the developer must demonstrate that the communities will not be adversely affected by exploration or site development. It is assumed that BOEM will continue to require and implement these measures at the lease sale phase. While these requirements and procedures are believed to be effective in identifying and avoiding most HDDC, it is possible that some unmapped or lower density communities could be mechanically damaged. In addition, despite the 76-m (250-ft) buffer, turbidity and sedimentation created by ground-disturbing activities could contact HDDC habitats. Although data are limited, studies in the GOM indicate that *Lophelia* corals are generally tolerant of turbidity and sedimentation, but at high enough levels suspended sediments can have lethal and sublethal effects (Brooke et al. 2009). Sediment could clog filtering organs,

thereby inhibiting food intake and increasing metabolic costs associated with sediment removal. Chronic bottom disturbance by drilling platform moorings could be particularly large in the deep ocean depending on the technology employed. Impacts from pipeline placement barges could be minimized by the use of dynamic positioning when possible. An FPSO system may be employed for deepwater wells. Under the FPSO system, oil would be transported from the well to a surface vessel and ultimately to shore. By eliminating the need for pipelines, an FPSO system would greatly reduce bottom disturbance and the chance for disturbing HDDC.

It is estimated that less than 1% of the deepwater GOM is occupied by features or areas that could support HDDC (NTL No. 2009-G40). HDDC are spread throughout the deep areas of the northern GOM (Figure 3.7.2-2 and Figure 3.7.2-3), which makes it unlikely that the damage to small areas of the bottom would threaten this resource as a whole. The BOEM Environmental Studies Program funds research to locate and understand the ecology of chemosynthetic communities. The BOEM updates regulations and mitigations based on the data from studies and from the biological interpretations of geophysical surveys, and this reduces the risk of accidental damage. If affected by exploration and site development activities, HDDC could be repopulated from nearby undisturbed areas, although the rate of recovery could be slow or nonexistent, particularly for chemosynthetic communities (MacDonald 2000). Recent studies have shown that chemosynthetic communities can be dynamic and that changes in species composition and colonization rates can operate on the order of years to decades (Lessard-Pilon et al. 2010). This suggests chemosynthetic communities could begin recovery relatively quickly if adversely affected by oil and gas activities, although full recovery would take much longer.

Miscellaneous discharges would occur at the surface and are not expected to reach HDDC. HDDC communities are also not likely to be buried or stressed by drilling muds and cuttings because NTL No. 2009-G40 (MMS 2010b) prohibits their discharge within 610 m (2,000 ft) of HDDC. Also, drilling muds and cutting would typically be discharged at the surface, and the depth of most HDDC communities make it unlikely that drilling muds and cuttings would be deposited in thick layers capable of adversely affecting these habitats.

Overall, impacts on HDDC from exploration and site development activities are expected to be minimal because of the provisions in place to protect HDDC and the review required for all drilling plans in water deeper than 300 m (984 ft). The likelihood of the undetected communities is greatly reduced through continuing improvements in the use of remote sensing data and groundtruthing. However, small and unmapped HDDC may be completely or partially destroyed by bottom-disturbing activities. In such cases, recovery would likely be long term, although permanent loss of the affected feature is also possible.

<u>Production.</u> Impacts on HDDC from routine operations could result from production platform placement; operational noise; miscellaneous discharges; the movement of anchors and chains, and the releases of process water (Table 4.4.6-3). In addition, the platform, pipelines, and mooring structure will create new artificial reef habitat. A general discussion of these impacts can be found in the soft sediments section above.

Impacts from bottom disturbing activities would be similar to those discussed above in the exploration and site development phase. The direct effects of production noise, platform placement, and anchor and chain damage on HDDC would be minimized by the 76-m (250-ft) buffer required between HDDC and ground-disturbing activities, although turbidity plumes resulting from those activities could reach HDDC. Impacts from produced water discharge should also be minimal, given the NPDES requirements and the distance of HDDC from the surface where produced water will likely be discharged. Cold water coral species may colonize the well, pipeline, and platform structures relatively quickly (Gass and Roberts 2005), although growth in the GOM appears to be slower than in other areas (Brooke and Young 2009). Over time, petroleum structures may become an artificial reef functioning in a manner similar to existing coral habitat. Colonization could benefit cold water corals by increasing suitable habitat and improving gene flow among populations (Macreadie et al. 2011). The artificial reef would only exist during the production phase, except in the cases where pipelines remain on the seabed and if tension leg platform templates are allowed to remain on the seabed. There is also possible decommissioning options including leaving portions of deepwater platforms in place.

There is evidence from California that oil and gas extraction reduces the natural release of hydrocarbons that support deep-sea chemosynthetic communities (Quigley et al. 1999). However, there is no evidence for this in the GOM. More research may be needed, but oil and gas operations are not likely to remove enough hydrocarbons to affect seep communities, given the volume of the overall resource. Unlike chemosynthetic communities, *Lophelia* corals do not depend on hydrocarbon seepage to meet their metabolic requirements (Becker et al. 2009) and presumably would not be affected.

Overall, impacts on HDDC from routine operations are expected to be minimal. However, small and unmapped HDDC may suffer major impacts.

Decommissioning. Explosive platform removals would not occur because floating platforms would be used in the deep sea. The removal of anchors and chains could affect nearby HDDC by suspending sediments in the water column as described above. Restrictions that prevent oil and gas extraction activities on or near HDDC would reduce the impacts of sediment disturbance. In the event that HDDC were affected during removal of existing platforms, recovery times would vary with the species affected and the extent and nature of the damage. Cold water corals are likely to recover much more rapidly than chemosynthetic communities. Overall, the effects of decommissioning on HDDC should be negligible.

Accidents. It is assumed that up to 8 large spills (≥1,000 bbl), up to 70 spills between 50 and 999 bbl, and up to 400 smaller spills between 1 and <50 bbl could occur during the lease period under the proposed action (Table 4.4.2-1). Most accidental spills would be small releases at the surface that are not expected to reach waters deep enough to contact HDDC. Much of the impact magnitude depends on the location of the spill, the direction of bottom currents, and the amount of oil released. The impact of a small pipeline leak would also be reduced by the requirement that pipelines be located 76 m (250 ft) away from HDDC habitats. Much of the impact magnitude depends on the location of the spill, the direction of bottom currents, and the amount of oil released. Oil from accidental releases would be dispersed by currents, rapidly

broken down by natural chemical and microbial processes, and would rise in the water column, thereby limiting the extent of HDDC habitat that would be affected by any given spill.

Catastrophic Discharge Event. The PEIS analyzes a CDE up to 7.2 million bbl (Table 4.4.2-2). A CDE resulting from pipeline ruptures, tanker spills, and a loss of well control would cause high turbidity and sedimentation and the potential release of large quantities of oil. A loss of well control or pipeline rupture in deep water would be particularly difficult to repair, given the tremendous depth. Although petroleum hydrocarbons serve as a nutrient source for symbiotic microorganisms associated with chemosynthetic communities, hydrocarbon toxicity and the partial or complete destruction of the habitat could occur if a large concentration of oil were to contact chemosynthetic communities. Similarly, oil covering deepwater corals could kill all or part of the community or cause sublethal physiological and reproductive effects. Oil typically rises to the surface over the release site. However, if dispersants are used in the subsurface or if the released oil has a significant fraction of gas, a subsurface plume may form that would increase the potential for contact with a HDDC habitat. A subsurface plume 200 m (656 ft) high and 2 km (1.2 mi) wide was found at a 1,000 m (3,280 ft depth for a distance of 35 km (22 mi) from the DWH site (Camilli et al. 2010). Whether there is a synergistic toxicity from dispersants and oil mixtures for chemosynthetic communities or deepwater corals is not known. There is evidence that oil released from the DWH event was mixed with dispersant (Kujawinski et al. 2011) and may have killed deepwater corals located 11 km (7 mi) from the well (see http://www.boemre.gov/ooc/press/2010/press1104a.htm). Certain organismal components of chemosynthetic HDDC are slow-growing, and if damaged, recovery would be long term (potentially hundreds of years), if they recover at all. Recent studies have shown that seep communities can be dynamic and that changes in species composition and colonization rates can operate on the order of years to decades (Lessard-Pilon et al. 2010). This suggests chemosynthetic communities could begin recovery relatively quickly if adversely affected by oil and gas activities, although full recovery would take much longer.

4.4.6.2.2 Alaska – Cook Inlet.

Routine Operations.

Exploration and Site Development. Impacting factors for the exploration and site development phase are shown in Table 4.4.6-4. Noise from seismic surveys and drilling could kill or injure organisms close enough to the noise source and reduce habitat suitability, because some species would avoid the area. The severity and duration of noise would vary with site and development scenario, but overall the impacts would be temporary and localized with overall minimal effects on benthic habitat. See Section 4.4.7 for detailed discussions of the effects of noise on different categories of biota.

Drilling exploratory wells would temporarily reduce habitat quality by generating turbidity and sedimentation for some distance around the disturbed area. It is estimated that 4 to 12 exploration wells and 42 to 114 production wells will be drilled in the Cook Inlet Planning Area. Exploration would use jack-up rigs and gravity rigs in water up to 46 m (150 ft), while

TABLE 4.4.6-4 Impacting Factors by Phase and Potential Effects on Marine Benthic Habitat in the Cook Inlet Planning Area

Impacting Factor	Potential Effects[a]
Exploration and Site Development	
Seismic surveys	Noise; localized anchoring disturbance
Anchoring and mooring of platforms, drillships, and seismic survey vessels	Sediment scour; temporary turbidity and sedimentation; localized alteration in sediment grain size and biogeochemical functions
Drilling and production platform placement	Noise; temporary sediment resuspension and turbidity; loss of natural habitat creation of artificial reef;
Drilling	Noise; small habitat loss; local alteration of sediment characteristics; temporary turbidity and sedimentation in surrounding areas
Miscellaneous discharges (deck washing, sanitary waste, vessel discharges)	Sediment contamination
Solid wastes	Sediment contamination
Discharge of drilling muds/cuttings	Sediment and water column contamination; alteration in sediment granulometry and biogeochemical functions
Pipeline trenching and placement	Noise; long-term loss and degradation of existing benthic habitat; temporary sediment resuspension and turbidity
Production	
Scour from anchors and the movement of pipelines and mooring structures	Chronic long-term disturbance of bottom sediments; turbidity
Platform production	Noise; loss of natural habitat creation of artificial reef
Produced water	Sediment contamination
Miscellaneous discharges	Sediment contamination
Solid wastes and debris	Sediment contamination
Decommissioning	
Miscellaneous discharge	Sediment contamination
Solid wastes and debris	Sediment contamination
Platform removal	Temporary turbidity and disturbance of bottom sediments

[a] Colors indicate impact level: white = negligible; blue = minor; yellow = moderate; red = major.

drilling ships or semisubmersible or floating drilling rigs would be used in deeper water. One to three production platforms may be installed under the proposed action. Production operations will most likely be carried out from fixed platforms. The installation of floating or fixed platforms would eliminate soft sediment where the legs or mooring structures (anchors and chains) encountered the seabed and where subsea equipment (such as reentry collars and blowout preventers) was installed. Chronic local bottom disturbance could result from subsequent movements of anchors and mooring lines associated with floating drilling platforms and support vessels. Because these types of drilling rigs affect only small areas of the bottom, the disturbance to benthic habitat would be minor.

Under the proposed action, it is estimated that 80 to 241 km (50 to 150 mi) of offshore pipeline may be placed in the Cook Inlet Planning Area, resulting in disturbance of up to 210 ha (519 ac) of seafloor in Cook Inlet. Pipelines would be trenched or installed and anchored on the sediment surface, which would temporarily disturb a large area of benthic habitat by generating turbidity and sedimentation. Placing the pipeline on the sediment surface would result in permanent loss of soft sediment habitat. Vessel anchoring during pipeline placement would also disturb soft sediment. It is anticipated that pipeline placement would displace benthic communities and temporarily alter grain size in areas of the seafloor with soft sediments. Cook Inlet waters are naturally high in suspended sediments, and analyses conducted for pipeline construction for previous lease sales indicated that turbidity from pipeline construction was expected to be within the natural range of turbidities for Cook Inlet (MMS 2003a).

It is assumed that drilling muds and cutting would be discharged into Cook Inlet for exploration wells only. Drilling wastes from development and production wells would be reinjected into the wells. Drill cuttings and drilling muds (including synthetic drilling fluids adhering to the cuttings) could contaminate and alter the sediments immediately around the wellhead and below the area where drilling wastes are discharged. Drill cuttings and muds rapidly reach the sediment surface and could be deposited in highly concentrated thick layers if deposited in shallow water or near the sediment surface. In the case of near-surface discharge in deep water, drilling muds would spread out in a thin veneer over a wide area. Settled muds could cause smothering of organisms, local hypoxia, changes in sediment characteristics and biogeochemical functions, and the loss of food resources in the immediate area. Although such releases could result in temporary impacts, the amount of discharge would be small compared to the more than 44 million tons of suspended sediment carried annually into Cook Inlet by runoff from area rivers (Brabets et al. 1999). The currents in lower Cook Inlet are likely strong enough to prevent the accumulation of muds and cuttings on the bottom; therefore, benthic habitats affected by drilling discharges would recover their natural grain size. In addition, the discharge of these drilling wastes is regulated by the USEPA under NPDES permits and can be discharged into the ocean only if they meet USEPA toxicity and discharge rate requirements. These requirements greatly reduce the potential for sediment contamination. A study of sediment quality in depositional areas of Shelikof Strait and Cook Inlet in 1997–1998 found that the concentrations of metals and polyaromatic hydrocarbons in sediments (1) posed no significant risk to benthic biota or fish and (2) were not linked to oil and gas development in upper Cook Inlet (MMS 2001a). Consequently, degradation of benthic habitat in Cook Inlet from drilling waste is not expected.

Other miscellaneous discharges (deck washing, sanitary waste, and vessel discharge) also have the potential to degrade benthic habitats. Miscellaneous discharges could contaminate sediments if discharged in relatively shallow water. However, considering the high flow rate of Cook Inlet, contaminants in surface discharges would most likely be diluted to negligible concentrations before reaching the sediment (MMS 2003a). Many vessel and platform wastes are disposed of on land, and those that are discharge at sea must meet USEPA and/or USCG regulatory requirements that limit their environmental effects.

Overall, activities conducted during the exploration and site development phase are expected to have minor to moderate effects on benthic habitat. Recovery of benthic habitat could range from short term to long term.

Production. Production activities that could affect soft sediment habitat are shown in Table 4.4.6-4 and include operational noise; miscellaneous discharges; bottom disturbance from the movement of anchors and mooring structures, and releases of process water. In addition, the platform would replace existing featureless soft sediments and serve as an artificial reef. The potential impacts of miscellaneous discharges would continue on from the exploration and development phase and are described above. Impacts on soft sediment habitats from vessel and operational noise are expected to be negligible but long term, with the impacts lasting the duration of the production phase.

Chronic bottom disturbance from the movement of anchors and chains associated with support vessels would affect soft sediment habitats as described above for the exploration and site development phase. Production platforms will most likely be fixed structures, but benthic disturbance from the movement of mooring anchors is possible if floating production platforms are used. The movement of pipelines following severe storms could be a long-term chronic disturbance to benthic habitat causing scour, turbidity, and sedimentation of soft sediment habitats. However, pipelines would either be anchored securely or trenched which would minimize the potential for bottom disturbance.

The platform structure would also create novel hard substrate, and the area on and immediately around the platform may have very different habitat functions and biological communities compared to the preconstruction period. Algae and sessile invertebrates could attach to the platform and in turn attract reef-oriented organisms. Sediments grain size, benthic communities, and biogeochemical processes in sediments around the platform could be altered by the flux of biogenic material (e.g., organic matter and shell material) from the platform to the seafloor.

Produced water can contain hydrocarbons, salts, and metals at levels toxic to marine organisms. Before being discharged into the ocean, produced water is typically treated and must meet NPDES requirements regarding discharge rate, contaminant concentration, and toxicity, thereby reducing the potential for sediment contamination. Under the proposed action, it is assumed that all produced waters would be treated and reinjected into the disposal well. Therefore, no impacts on pelagic habitat are expected to result from produced water.

Overall, activities conducted during the production phase are expected to have minor effects on benthic habitat on a regional scale. Platforms would alter benthic habitat on a local scale.

Decommissioning. Platform removal activities would result in loss of the platforms reef function, bottom disturbance, and a temporary increase in turbidity and sedimentation (Table 4.4.6-4). Over time, most sediments will recover their normal physical characteristics, ecological functions, and biological communities. No explosives would be used during platform

removal. Pipelines installed and anchored on the seafloor would be capped and left in place, although there is the potential for chronic sediment disturbance from pipeline movement.

Overall, impacts on benthic habitat associated with removal of platforms are expected to be negligible.

Accidents. It is assumed that 1 to 3 small spills between 50 and 999 bbl and 7 to 15 smaller spills between 1 and <50 bbl, and large spills (≥1,000 bbl) could occur under the proposed action (Table 4.4.2-1). Much of the impact magnitude depends on the location of the spill, the direction of bottom currents, and the amount of oil released. Oil from accidental releases would be dispersed by currents, rapidly broken down by natural chemical and microbial processes, and would rise in the water column, thereby limiting the extent of benthic habitat that would be affected by any given spill. A few of these spills might be large enough and persist long enough to drift to shore where they could contaminate benthic habitat. However, it is anticipated that only a small amount of shoreline would be affected by these spills and they would not, therefore, present a substantial risk to the overall resource. The benthic habitat would recover without mitigation because of natural breakdown of the oil, sediment movement by currents, and reworking by benthic fauna.

Oil spill-response activities such as burning, skimming, and chemical release (e.g., dispersants or coagulants) could affect benthic habitat and biota. Skimming and burning could kill pelagic live stages of benthic biota. The chemicals used during a spill response are toxic, but there is controversy about whether the combination of oil and dispersant is more toxic than oil alone (NRC 2005b; Fingas 2008; Holland-Bartels and Kolak 2011). The use of dispersant would likely reduce oiling of nearshore benthic habitat but may increase the exposure of subtidal benthic habitat and biota to toxic fractions of oil (NRC 2005b). In shallow water, the presence of, and noise generated by, oil spill-response equipment and support vessels could temporarily disturb benthic habitat in the vicinity of the response action, potentially reducing habitat use or disturbing migration. As with the spill itself, the location and time of the year the cleanup occurs would be an important determinant of impacts to benthic habitat and biota.

Catastrophic Discharge Event. The PEIS analyzes a CDE of 75,000 to 125,000 bbl. In the case of a CDE, the likelihood of oil contacting shoreline benthic habitat and biota is relatively high because the Cook Inlet Planning Area is located within a confined estuary. Oil reaching intertidal benthic habitat would likely be drawn below the sediment surface by capillary action. Subsurface oil is more persistent because it is spread throughout a matrix of sediment types and is less subject to physical weathering from sunlight and wave action (Taylor and Reimer 2008). Decades after the *Exxon Valdez* spill, highly weathered, asphalt-like or tar deposits may still be present beneath the surface of intertidal sediments of Prince William Sound, especially in the intertidal zone of low-energy, protected, unexposed bays and beaches with boulder/cobble or pebble/gravel sediments (Short et al. 2007; Taylor and Reimer 2008; *Exxon Valdez* Oil Spill Trustee Council 2010c). NOAA reported that 97 metric tons (tonnes) (107 tons) of oil may still be present in subsurface sediments in discontinuous patches, although this is only a small fraction of the >20,000 metric tons of oil initially deposited on beaches. After a initial rapid decline of 68% per year during 1991–1992, the oil is currently decreasing in concentration at a rate of 0–4% per year (NOAA 2010d; Short et al. 2007). Overall, studies of the *Exxon*

Valdez spill indicate that a catastrophic spill could result in long-term degradation of benthic habitat and sublethal effects on benthic biota. As of 2010, intertidal sediments and communities are considered to still be recovering from the *Exxon Valdez* spill (*Exxon Valdez* Oil Spill Trustee Council 2010c).

Following the *Exxon Valdez* oil spill in 1989, highly elevated hydrocarbon concentrations in intertidal sediments were found at heavily oiled sites followed by an apparent migration of the oil into the shallow subtidal zone in 1991 (Wolfe et al. 1993). Oil in the intertidal and subtidal zones can affect not only lower trophic-level organisms but also higher trophic-level organisms, such as marine and coastal birds (Section 4.4.7.2.2) and fish (Section 4.4.7.3.2; Peterson et al. 2003). However, subtidal sediment may be less likely to suffer long-term contamination because oil tends to float and natural weathering, bottom scour, and depositional processes would reduce the oil concentration in the sediment. Biological impacts on subtidal biota are also typically short term (Lee and Page 1997). Oiled subtidal sediments were detected shortly after the *Exxon Valdez* spill, but not in follow-up studies conducted in 2001, and subtidal sediment concentrations of oil are much lower than concentrations in intertidal sediments (Lee and Page 1997). Subtidal habitat and communities are considered to be very likely recovered by the *Exxon Valdez* Oil Spill Trustee Council (2010c).

Broken ice occurs in the northern and western portions of lower Cook Inlet during fall and winter. If an open water spill were to occur at this time, the ice would contain the oil somewhat and reduce spreading and contacting intertidal benthic habitat. However, oil cleanup is also more difficult in broken ice conditions. Oil from spills occurring in the winter may be trapped under ice, resulting in localized, persistent degradation of habitat quality and ecosystem function.

4.4.6.2.3 Alaska – Arctic.

Routine Operations.

Exploration and Site Development. Impacting factors for the exploration and site development phase relevant to seafloor habitat are shown in Table 4.4.6-5. It is assumed that oil and gas development activity would be restricted to waters less than 91 m (300 ft). Exploration drilling would employ gravel islands or mobile platforms in waters between 6 to 18 m (20 and 60 ft) in depth and drillships in deeper water. Production operations will be conducted from subsea wells, gravel islands, or gravity-based platforms in water less than 12 m (40 ft) in depth, and from larger gravity-based platforms in deeper waters. It is assumed that as many as 92 subsea production wells and 9 artificial islands could be constructed during the lease period with a footprint of approximately 1.5 ha (4 ac) per platform or island. Under the proposed action, it is estimated that 89 to 652 km (55 to 405 mi) of new offshore pipeline would be placed in the Beaufort and Chukchi Sea Planning Areas, resulting in disturbance to 77 to 567 ha (190 to 1,402 ac) of seafloor.

Drilling, platform and pipeline placement, and construction and maintenance of artificial islands have the potential to reduce benthic habitat quality by disturbing the seafloor and

TABLE 4.4.6-5 Impacting Factors by Phase and Potential Effects on Marine Benthic Habitat in the Beaufort and Chukchi Sea Planning Areas

Impacting Factor	Potential Effectsa
Exploration and Site Development	
Vessel traffic	Noise
Seismic surveys	Noise; localized anchoring disturbance
Anchoring and mooring of platforms, drillships, and seismic survey vessels	Sediment scour; temporary turbidity and sedimentation; localized alteration in sediment grain size and biogeochemical functions
Drilling and subsea well and production platform placement (including artificial islands)	Noise; temporary sediment resuspension and turbidity; loss of natural habitat creation of artificial reef; loss of benthic habitat due to artificial islands
Drilling	Noise; small habitat loss; local alteration of sediment characteristics; temporary turbidity and sedimentation in surrounding areas
Miscellaneous discharges (deck washing; sanitary waste, vessel discharges)	Sediment contamination
Solid wastes	Sediment contamination
Discharges of drilling muds/cuttings	Sediment and water column contamination; alteration in sediment grain size and biogeochemical functions
Pipeline trenching and placement	Noise; long-term loss and degradation of existing benthic habitat; temporary sediment resuspension and turbidity
Production	
Scour from anchors and the movement of pipelines and mooring structures	Chronic, long-term disturbance of bottom sediments; turbidity
Platform production	Noise; loss of natural habitat creation of artificial reef
Produced water	Sediment contamination
Miscellaneous discharges	Sediment contamination
Solid wastes and debris	Sediment contamination
Decommissioning	
Miscellaneous discharge	Sediment contamination
Solid wastes and debris	Sediment contamination
Platform removal	Temporary turbidity and disturbance of bottom sediments

[a] Colors indicate impact level: white = negligible; blue = minor; yellow = moderate; red = major.

generating noise, turbidity, and sedimentation for some distance around the disturbed area and potentially adversely affecting benthic biota. Such activities could reduce benthic habitat quality by displacing benthic organisms and interrupting the movement and dispersal of species of all life stages. Chronic bottom disturbance would result from movements of anchors associated with floating drilling vessels and support vessels. The installation of platforms would eliminate soft sediment where the platform and mooring structures (anchors and chains) encountered the seabed and where subsea equipment (such as reentry collars and blowout preventers) was installed and depending on location, habitat loss for benthic feeders could be important. The area of burial around constructed islands could increase over time because of erosion from storm action and ice gouging on island slopes. The construction of subsea wells and gravel islands

would eliminate soft sediment habitat, but the total bottom area that could be disturbed would be relatively small compared to the overall area of benthic habitat available in the Beaufort and Chukchi Sea Planning Areas.

Pipelines would be buried in waters less than 50 m (156 ft) to prevent damage from ice gouges, and pipelines in deeper water would be installed and anchored on the seafloor. Pipelines installed and anchored on the seafloor would replace natural soft sediment habitat with hard-bottoms, which would alter species composition and biogeochemical habitat function. For buried pipelines, benthic organisms within the trenched corridor would be killed or injured, and organisms to either side of the pipeline would be buried by sediments. Disturbed sediments with a greater proportion of sand to mud may fill in with fine, silty material that would alter grain size and potentially inhibit the colonization by species that existed prior to the disturbance. The recovery period for soft sediment benthic habitat affected by bottom disturbance would depend on factors such as water depth, sediment type, and community composition. In the Arctic, the benthic community in these areas experiences a naturally high amount of disturbances from ice gouging, strudel scour, and severe storms, and hyposaline and highly turbid conditions occur naturally during spring breakup. Therefore, seafloor biota in the Beaufort and Chukchi Seas may be adapted to such conditions. Turbidity plumes from construction activities under the proposed action would be temporary and disturbed areas would probably be recolonized within a few years (Woodward-Clyde Consultants 1996), although recovery could take more than a decade (Conlan and Kvitek 2005).

Increased water turbidity and sedimentation from ground-disturbing activities discussed above could directly affect kelp growth by burying kelps and other organisms, altering the optical properties of the water column, and limiting photosynthesis (Maffione 2000; Dunton et al. 2009). It is estimated that kelp contributes 50–56% of annual productivity in the Boulder Patch and is an important source of organic matter that supports various members of the epilithic community (Dunton 1984). Overall, measurements have indicated natural inputs of suspended sediment from runoff and erosion are large relative to any anthropogenic inputs of sediment (Trefry et al. 2004). Therefore, unless activities are located in the immediate vicinity of the Boulder Patch, the proposed action is not expected to substantially increase turbidity or sedimentation on the Boulder Patch. Planning and permitting procedures and requirements will likely be sufficient to avoid such occurrences. Under current regulations, proposed development near the Boulder Patch area requires detailed surveys to identify the boundaries of the Boulder Patch habitat, and the expected levels of impacts from proposed activities must be identified, which will likely be sufficient to minimize impacts from pipeline construction within the Boulder Patch area. However, the construction of offshore pipelines could affect kelp habitat area outside of the Boulder Patch. Recovery would be slow if kelp communities were mechanically damaged by drilling or anchor and chain scour. It is estimated that recovery of kelp growth in areas trenched for pipeline construction could occur within a decade in some cases or could be much longer depending on the proportion of hard substrate exposed after pipeline construction was completed (Konar 2006). Although habitat loss may be minor when compared to the large size of the Arctic Planning Areas, even small habitat loss can be significant to specific populations depending on where it occurs. Overall, moderate but temporary impacts on seafloor habitat are expected to result from pipeline placement.

It is assumed that drilling muds and cutting would be discharged into the Beaufort and Chukchi Sea Planning Areas for exploration wells only. Drilling wastes from development and production wells would be reinjected into the wells. Drill cuttings and drilling muds (including synthetic drilling fluids adhering to the cuttings) could contaminate and alter the grain size of sediments immediately around the wellhead and below the area where these drilling wastes are discharged. Drill cuttings and muds rapidly reach the sediment surface and could be deposited in highly concentrated thick layers if deposited in shallow water or near the sediment surface. In the case of near-surface discharge in deep water, drilling muds would spread out in a thin veneer over a wide area. Settled muds could cause smothering of organisms, local hypoxia, changes in sediment characteristics and biogeochemical functions, and the loss of food resources in the immediate area. Arctic sediments are constantly changing in grain size (Neff & Associates LLC 2010) due to natural disturbances. Thus, after they reach the sediment, discharged muds and cuttings are likely over time to be redistributed over a broad area. Although such releases could result in temporary, localized increases in sediment load and deposition, this amount of discharge would be small compared to the more than 6.35 million tons of suspended sediment carried annually into the Beaufort Sea alone by runoff from area rivers (Neff and Associates LLC 2010). In addition, drilling muds or cuttings that are discharged into the ocean are regulated by the USEPA under NPDES permits and can be discharged into the ocean only if they meet USEPA toxicity and discharge rate requirements. These requirements greatly reduce the potential for sediment contamination. Discharges of drilling wastes in the vicinity of the Steffansson Sound Boulder Patch are regulated under NPDES Permit Number AKG280000. Consequently, there should be minimal impacts on Boulder Patch habitat from drilling wastes. Therefore, the impacts from drilling waste discharges are expected to be minor.

Miscellaneous discharges (deck washing, sanitary waste, and vessel discharge) also have the potential to degrade seafloor habitats. Miscellaneous discharges could contaminate sediments if discharged in relatively shallow water. However, many vessel and platform wastes are disposed of on land, and those that are discharged at sea must meet USEPA and/or USCG regulatory requirements that limit their environmental effects. In addition, stratification of the water column prevents diffusion of chemicals to bottom layers in many areas.

Noise from seismic surveys and drilling could kill or injure organisms close enough to the noise source and reduce habitat suitability as some species would avoid the area. The severity and duration of noise would vary with site and development scenarios, but the impacts would be temporary and localized with overall minimal effects on soft sediment habitat. See Section 4.4.7 for detailed discussions of the effects of noise on different categories of biota.

Overall, activities conducted during the exploration and site development phase are expected to have minor to moderate effects on seafloor habitat on a planning area scale. Recovery of seafloor habitat could range from short-term (months) to long-term (decades).

Production. Production activities that could affect soft sediment habitat are shown in Table 4.4.6-5. The potential impacts of miscellaneous discharges would continue on from the exploration and development phase and are described above. Impacts on soft sediment habitats from vessel and operational noise are expected to be negligible but long term, with the impacts lasting the duration of the production phase. Chronic bottom disturbance from the movement of

anchors and chains associated with support vessels would affect soft sediment habitats as described above for the exploration and site development phase. These disturbances would be long term and chronic and cause scour, turbidity, and sedimentation of soft sediment habitats.

Platforms and gravel islands would provide additional habitat for marine plants and animals (e.g., kelp and mussels) that require a hard substrate. Therefore, the overall probable effect of platform placement and island construction would be to alter local species composition. In addition, sediment grain size and biogeochemical processes around the platform would be altered by the flux of biogenic material (shell and organic matter) from the platform to the seafloor. Data from other hard-bottom habitats suggest colonization would be slow and seasonal ice cover may restrict colonization to short-lived opportunistic species. Any artificial reef function the platform does serve would exist only during the production phase, so impacts, if any, would be temporary but lasting decades. However, gravel islands would remain in place. The islands may eventually erode and form a subsea gravel bed that would provide habitat to species attracted to hard substrate.

Produced water is a normal product of oil and gas extraction that contains contaminants such as polycyclic aromatic hydrocarbons and heavy metals and therefore represents a potential source of contamination to benthic habitats. It is assumed that all produced water will be disposed of onshore or reinjected into the well rather than discharged into the ocean. If produced water is discharged into the ocean, it is typically treated and must meet NPDES requirements regarding discharge rate, contaminant concentration, and toxicity, thereby reducing the potential for sediment contamination. Consequently, no impacts from the discharge of produced water are expected.

The results of the Arctic Nearshore Impacts Monitoring in the Development Area study funded by BOEM provide a good summary of the long-term changes to benthic habitats resulting from oil and gas production in the Arctic (Neff and Associates LLC 2010). No relationship between the location of oil and gas production and the concentration of metals and hydrocarbons in sediment and marine animals was detected. The study concluded that metals and PAHs in Beaufort Sea sediments were primarily derived from sediments delivered by rivers, not oil and gas activities. Overall, activities conducted during the production phase are expected to have minor effects on benthic habitat.

Decommissioning. Miscellaneous and solid waste releases discussed above would continue during the decommissioning phase (Table 4.4.6-5). Platform and mooring structure removal activities would result in bottom disturbance and a temporary increase in turbidity and sedimentation. No platforms are expected to be removed using explosives. Over time, sediments will recover their normal physical characteristics, ecological functions, and biological communities. Overall, activities conducted during the decommissioning phase are expected to have negligible effects on benthic habitat.

Accidents. It is assumed that large spills (≥1,000 bbl), up to 35 small spills (50 to 999 bbl), and up to 190 smaller spills (>1 and <50 bbl) could occur during the lease period under the proposed action (Table 4.4.2-2). Much of the impact magnitude depends on the location of the spill, the direction of bottom currents, and the amount of oil released. Oil from accidental

releases would rise in the water column, thereby limiting the extent of benthic habitat that would be affected by any given spill. Oil from most small surface spills is likely to reach the sediment only at biologically negligible concentrations. Most subsea spills would be minor, and the hydrocarbon concentrations would typically be diluted to background levels within a few hundred meters to a few kilometers of the spill site. Large spills would affect a wider area of benthic habitat and potentially persist in the sediment for an extended period. Benthic habitat would recover without mitigation because of natural breakdown of the oil, sediment movement by currents, and reworking by benthic fauna.

Oil spill-response activities such as burning, skimming, and chemical release (e.g., dispersants or coagulants) could affect benthic habitat and biota. Skimming and burning could kill pelagic live stages of benthic biota. The chemicals used during a spill response are toxic, but there is controversy about whether the combination of oil and dispersant is more toxic than oil alone (NRC 2005b; Fingas 2008; Holland-Bartels and Kolak 2011). The use of dispersant would likely reduce oiling of nearshore benthic habitat, but may increase the exposure of subtidal benthic habitat and biota to toxic fractions of oil (NRC 2005b). In shallow water, the presence of, and noise generated by, oil spill-response equipment and support vessels could temporarily disturb benthic habitat in the vicinity of the response action, potentially reducing habitat use or disturbing migration. As with the spill itself, the location and time of the year the cleanup occurs would be an important determinant of impacts on benthic habitat and biota.

Catastrophic Discharge Event. This PEIS analyzes a CDE up to 2.2 million bbl in the Chukchi Sea Planning Area and up to 3.9 million bbl in the Beaufort Sea Planning Area (Table 4.4.2-2) that could result in lethal or sublethal concentrations of hydrocarbons or mixtures of hydrocarbons and dispersants (if used), which could accumulate in soft sediments, reducing habitat function. The magnitude of the impact depends primarily on the location of the well, the volume released, and the speed at which the well was capped. Most oil released in a surface or seafloor spill would float above the sediment, but sediment contamination could occur from the deposition of oiled sediment and organic matter (dead plankton and organic flocculants) falling from the water column. In addition, oil could reach the shoreline and contaminate coastal benthic habitat (see Sections 4.4.6.1.3 and 4.4.6.2.2 for a detailed discussion of the impacts of oil spills on coastal habitat). The soft sediment habitat would recover without mitigation because of natural breakdown of the oil, sediment movement by currents, and reworking by benthic fauna. However, the cold temperatures of the Arctic may allow hydrocarbons to persist in the sediments longer than in temperate areas. Overall, impacts on soft sediments from catastrophic releases could be major and potentially long-term.

The magnitude of impacts on the Boulder Patch from an oil spill would depend on the location and severity of the spill. Oil spills contacting the Stefansson Sound Boulder Patch community could cause both lethal and sublethal effects on marine plants and invertebrates. Sublethal effects occur at lower concentrations and include reduced growth and/or fecundity, increased physiological stress, and behavioral changes. *Laminaria solidungula*, found in the Stefansson Sound Boulder Patch, has not been studied directly, but other Laminaria species from the Canadian Beaufort Sea showed marked physiological impairment when exposed to oils of several types and concentrations (Hsiao et al. 1978; Shiels et al. 1973). Photosynthesis would probably be reduced by the floating oil because of reduced light penetration, and if the floating

oil persisted long enough, it could affect growth and reproduction of the kelp. Benthic animal communities have also been shown to have major shifts in species composition following exposure to oil (Dean and Jewett 2001). Impacts on kelp habitat from an oil spill could be long term, but are not expected to be permanent. *Laminaria* beds oiled by the *Exxon Valdez* spill recovered within 10 years (Dean and Jewett 2001).

If the spill were to occur during winter, cleanup would be much more difficult because sea ice would limit access to the spill (reviewed in Holland-Bartels and Kolak 2011). Oil cleanup response plans and technologies for ice-covered spills are still evolving, and the efficacy of many proposed spill countermeasures is as yet unknown (Holland-Bartels and Kolak 2011). If the spill were to occur under ice, oil would be trapped and essentially remain unchanged until breakup occurred and the ice began to melt. Oil could float or freeze within the ice, which would limit the potential for oil to reach deeper subtidal seafloor habitat. However, oil transported under ice to nearshore areas would remain unweathered and could degrade intertidal and shallow subtidal benthic habitat throughout the winter and after the ice thaws. The effects on primary and secondary biological productivity could be severe as well, because of loss of epontic and ice-associated fish assemblages due to oil toxicity. Oil under landfast ice would be more easily accessed and cleaned, which could reduce the duration and severity of impacts.

4.4.6.2.4 Conclusion. Routine Program activities conducted during the exploration, development, and production phases could result in moderate impacts on benthic habitat in the GOM, Cook Inlet, and Beaufort and Chukchi Sea Planning Areas. The primary impacts would be on soft sediments from ground disturbance during drilling and pipeline and platform placement as well as the discharge of drilling muds and cuttings and produced water. Existing mitigation measures, if applied, should ameliorate most direct impacts on sensitive benthic marine habitats, including soft sediments, hard-bottoms, coral reefs, and HDDC in the GOM and Boulder Patch communities in the Beaufort and Chukchi Seas. However, in some cases activities that generate noise, turbidity, and sedimentation may affect sensitive habitats depending on their proximity to these activities. In addition, unmapped sensitive benthic habitats not covered by the stipulations may be damaged or destroyed. If sensitive benthic live-bottom and associated biota were damaged or killed, the impacts could be long term or permanent because living benthic habitats are slow-growing and have highly specific habitat requirements. Overall, moderate, temporary, and localized impacts, primarily on soft sediment benthic habitats, are expected to result from routine exploration, site development, and production activities.

Small hydrocarbon spills are not likely to result in the degradation of benthic marine habitat because spills at the surface would likely reach the benthic marine habitats only in low concentrations. However, large or CDE spills from a loss of well control and pipeline ruptures would physically disturb the seafloor around the spill site, and a subsurface plume extending a large distance from the spill could form if dispersants are used or if the oil released is mixed with gas. The impact of accidental releases of oil depends on several factors such as the size, duration, timing, and location of the spill, and the nature of the benthic habitat contacted by the oil. The season in which the spill occurs is especially important in Alaskan waters due to heavy seasonal ice cover that could hinder cleanup efforts. In the unlikely event that a CDE occurred, sensitive benthic habitats could suffer long-term loss of ecological function because of both

hydrocarbon toxicity and the subsequent cleanup activities. Hydrocarbons could persist at sublethal concentrations in sediments for decades, and sensitive habitats (i.e., kelp beds, intertidal zones; live-bottom and coral reef) damaged by a spill would likely recover slowly and possibly not recover at all. However, hydrocarbons would be broken down by natural processes, and most benthic habitats are likely to eventually recover. Many sensitive benthic habitats are widely scattered; therefore, individual spills would be unlikely to threaten the resource as a whole.

4.4.6.3 Marine Pelagic Habitats

4.4.6.3.1 Gulf of Mexico.

Water Column.

Routine Operations.

Exploration and Site Development. See Section 4.4.3.1.1 for a general discussion of the impacts of exploration and site development on water quality. During the exploration and site development phase, pelagic habitat would be affected by platform and pipeline placement, drilling activity, seismic surveys, platform lighting, and aircraft and vessel traffic, and miscellaneous vessel and platform discharges (Table 4.4.6-6). Noise impacts would be greatest near the source and would temporarily reduce habitat quality (i.e., induce physiological stress, injury, or behavioral changes) for certain species whose noise tolerance is below that of the noise level generated by the exploration and development activities. See Section 4.4.7 for detailed discussions of the effects of noise on different categories of biota. Construction lighting would alter the pelagic light regime of a small area and would attract phototaxic organisms to the platform. Studies in the northern GOM suggest that platform lighting could enhance phytoplankton productivity around the platform, potentially increase prey availability, and improve the visual foraging environment for fishes (Keenan et al. 2007).

Bottom water quality would be temporarily affected by turbidity from sediment disturbance during drilling, platform placement, and pipeline trenching and placement. Turbidity from bottom-disturbing activities could kill zooplankton, although the population-level effects would be negligible. Photosynthetic productivity of phytoplankton that specialize in near-bottom habitats may be reduced if the turbidity plume reduced solar irradiance at depth. However, the turbidity plume would be temporary, and phytoplankton populations have rapid replacement times (Behrenfeld et al. 2006). Therefore no permanent impacts on phytoplankton populations are anticipated. FPSO systems could potentially be used in deep water, which would reduce the need for pipeline placement and greatly reduce water quality impacts.

The discharge of drilling muds and cuttings can occur near the water's surface or the seafloor. Releases at the seafloor would affect bottom waters in ways similar to those of bottom-disturbing activities, resulting in a temporary reduction in water quality. Surface discharge of drilling muds and cuttings would create a turbidity plume that would diminish within some

TABLE 4.4.6-6 Impacting Factors by Phase and Potential Effects on Marine Pelagic Habitat in the CPA and WPA of the GOM

Impacting Factor	Disturbance[a]
Exploration and Site Development	
Vessel traffic	Noise
Seismic surveys	Noise
Miscellaneous discharges (deck washing, sanitary waste, bilge and ballast water)	Degraded water quality
Drilling and discharge of drilling muds/cuttings	Noise; degraded water quality
Pipeline trenching	Noise; turbidity
Drilling platform placement	Noise; turbidity
Offshore lighting	Alteration of light field
Production	
Production platform placement	Noise; turbidity
Production	Noise
Produced water discharge	Degraded water quality
Miscellaneous discharges (deck washing, sanitary waste)	Degraded water quality
Offshore lighting	Alteration of light field
Decommissioning	
Miscellaneous discharges (deck washing, sanitary waste, bilge and ballast water)	Degraded water quality
Explosive platform removal	Noise, turbidity
Offshore lighting	Alteration of light field

[a] Colors indicate impact level: white = negligible; blue = minor; yellow = moderate; red = major.

distance from the release point. The turbidity plume could smother or stress small zooplankton and reduce phytoplankton productivity by decreasing the depth and intensity of light penetration. While synthetic drilling fluids are not discharged directly, they do enter the pelagic environment by adhering to drilling cuttings (Neff et al. 2000). These cuttings tend to aggregate and settle rapidly to the sea floor. This tendency for aggregation increases the higher the concentration of adhered synthetic fluid. The rapid settling of the cuttings reduces their dispersion in the water column and water column turbidity (Neff et al. 2000). In addition, synthetic drilling fluids have low toxicity (Neff et al. 2000). Consequently, the release of such cuttings and associated synthetic drilling fluids should result in minor, short-term, and relatively localized impacts. Similarly, in well-mixed ocean waters, water-based drilling muds and cuttings are diluted by 100-fold within 10 m (33 ft) of the discharge and by 1000-fold at a distance of about 100 m (330 ft) from the platform (Neff 2005). These estimates are for well-mixed water, and therefore the size of the turbidity field will vary with hydrology. The generally rapid dilution would limit the degradation of pelagic habitat to a localized area, and impacts on pelagic habitat would be minor. Degradation of pelagic habitat would also be limited by NPDES permits regulating the discharge of drill cuttings in a way that reduced impacts on water quality (Neff et al. 2000; Neff 2005).

Pelagic habitat would be affected minimally and temporarily by miscellaneous discharges (deck drainage, sanitary and domestic waste, bilge and ballast water) during site development. Such releases would be minor in quantity, would be rapidly diluted, and would likely have only negligible impacts on pelagic habitat. In addition, many vessel and platform wastes are disposed of on land, and those that are discharged at sea must meet USEPA and/or USCG regulatory requirements that limit their environmental effects.

Production. Impacts from offshore lighting, miscellaneous discharges, and bottom disturbance from the movement of platform and support vessel anchors and chains will also exist in the production phase and are described above. In addition, production noise and produced water discharge could affect pelagic habitat quality (Table 4.4.6-6). Production noise is not expected to appreciably degrade habitat quality, as production platforms are known to have high biological abundance and diversity. Impacts on pelagic habitat from produced water should be minor because produced water is treated before being discharged and must meet NPDES permitting guidelines regarding discharge rate and toxicity. Produced water is high in organic matter and has the potential to generate local hypoxia (Rabalais 2005). However, a major study of produced water discharges across the northern GOM indicated that despite the large volume discharged, the contribution of produced water to bottom water hypoxia is minimal when compared to riverine inputs, and produced water did not make a significant contribution to the hypoxic zone in the GOM (Rabalais 2005; Bierman et al. 2007).

Algae and sessile invertebrates would rapidly colonize the platform and would in turn attract mobile reef-oriented organisms. Thus, the platform structure would serve as a novel artificial reef in formerly open water habitat. The platform would function in a manner similar to existing reefs, banks, and topographic features and may increase zooplankton densities around the platform. A floating platform would extend from the surface to some depth below the waterline, potentially creating a floating reef habitat that would attract organisms to adjacent surface waters. The artificial reef would only exist during the production phase, unless the platform was permitted to remain in place after decommissioning. In deep sea areas, the platform and mooring structures would likely be completely removed during decommissioning, so impacts from bottom disturbance would be temporary.

Decommissioning. Impacts from vessel noise, platform lighting, and miscellaneous discharges are discussed above and would continue throughout the decommissioning phase (Table 4.4.6-6). In addition, bottom disturbance during platform removal (potentially including the use of explosives) would temporarily disturb pelagic habitat by increasing noise and turbidity for some length of the water column (see individual sections on marine biota for discussions of the impacts of explosive platform removal). These impacts would temporarily degrade habitat quality, but conditions would return to normal as suspended sediments dispersed and resettled, and the long-term impacts to pelagic habitat would be negligible.

Accidents. Accidental hydrocarbon releases can occur at the surface or at the seafloor. Natural gas would tend to rise in the water column and could degrade habitat quality in a large portion of the water column. However, natural gas is also less persistent in the environment than oil. Evidence from the DWH event indicates that methane gas released from the well was rapidly broken down by bacterial action with little oxygen drawdown (Camilli et al. 2010;

Kessler et al. 2011). Consequently, the remainder of the discussion focuses on oil spills. It is assumed that large spills (≥1,000 bbl), up to 70 spills between 50 and 999 bbl and 400 smaller spills between 1 and 50 bbl could occur during the lease period under the proposed action (Table 4.2.2-1). Impacts on pelagic habitat from accidental oil spills could result from surface releases from platforms or vessels or from seafloor releases from pipelines and the wellhead. Modeling indicates that oil spilled at the surface could mix to a depth of 20 m (66 ft) at highly diluted concentrations (MMS 2008a). Accidental oil releases from pipeline leakage would degrade bottom water quality at local scales, but would be broken down over time through natural processes, and the long-term effects on pelagic habitat and biota would be minor. Large spills would degrade pelagic habitat quality over a wider area and potentially reduce the habitat value and ecosystem function in the areas affected. Eventually, the oil would be broken down by natural processes, and pelagic habitat would recover. See Section 4.4.3.2.1 for a further discussion of the effects of oil spills on water quality in the GOM.

Oil spill-response activities such as burning, skimming, and chemical release (e.g., dispersants or coagulants) could affect pelagic habitat and biota. Burning would kill pelagic biota in the burn area, and skimming would remove aquatic organisms from the water column or trap them in oiled water. The chemicals used during a spill response are toxic, but there is controversy about whether the combination of oil and dispersant is more toxic than oil alone (NRC 2005b; Fingas 2008; Holland-Bartels and Kolak 2011). The use of dispersant would likely increase the areal extent of oil dispersion and the exposure of pelagic biota to oil. The presence of, and noise generated by, oil spill-response equipment and support vessels could temporarily disturb pelagic habitat in the vicinity of the response action, potentially reducing habitat use or disturbing migration. As with the spill itself, the location and time of the year the cleanup occurs would be an important determinant of impacts on pelagic habitat and biota.

Catastrophic Discharge Event. The PEIS analyzes a CDE up to 7.2 million bbl (Table 4.4.2-2). Pelagic organisms could be exposed to lethal or sublethal concentrations of hydrocarbons or mixtures of hydrocarbons and dispersants (if used). The extent and magnitude of the impact depend primarily on the location of the well, the volume of oil released, and the season in which the spill occurs. Typically oil rises from the seafloor to the sea surface forming a surface slick. However, a subsurface plume capable of traveling long distances could form if dispersants are used or if the well releases a mixture of oil and gas. In the case of the DWH event, hydrocarbons were detected as far as 56 km (35 mi) northeast and southwest of the well (Camilli et al. 2010; Haddad and Murawski 2010). The DWH event also changed pelagic microbial communities. Menthanotropic and oil-eating bacteria were greatly increased following the DWH event (Camilli et al. 2010; Kessler et al. 2011). However, the increase in microbial biomass did not result in significant oxygen depletion, even in deep water. The hydrocarbons appeared to be assimilated by bacteria and transferred up through the zooplankton food web (Graham et al. 2010).

These studies suggest the GOM has a tremendous natural capacity to assimilate accidental oil spills, and pelagic habitats would eventually recover their ecological function as hydrocarbons broke down. However, recovery time would vary with local conditions and the degree of oiling. For example, the shallow pelagic habitats would probably recover more quickly than deepwater pelagic habitats because of the greater physical and biological activity in

shallow water. Overall, impacts on pelagic habitats from a CDE could be negligible to moderate and potentially short term to long term, but no permanent degradation of pelagic habitats is expected to result.

Sargassum.

Routine Operations.

Exploration and Site Development. *Sargassum* could be affected by several activities during the exploration and site development phase of OCS oil and gas development including vessel traffic, miscellaneous discharge, and drilling waste discharge. Drilling muds and cuttings are typically discharged near surface waters and could come into contact with *Sargassum* mats. Turbidity generated by the discharge could reduce photosynthesis in *Sargassum* and cause physiological stress on associated animal communities. The cuttings should settle to the bottom within 1,000 m (3,280 ft) of the release point (Continental Shelf Associates, Inc. 2006), so the contact should be minimal. NPDES permit requirements regulating the toxicity and amount of drilling wastes discharged would also limit the potential for impacts on *Sargassum*. Miscellaneous discharges (deck drainage, sanitary and domestic waste, bilge and ballast water) are not expected to affect *Sargassum* because the releases would be minor in quantity and would be rapidly diluted. Service vessels and drilling ships could damage *Sargassum* mats with their propeller or by entraining *Sargassum* in their cooling water intake. The effects on individual *Sargassum* mats and the associated communities could be complete or partial loss of the *Sargassum*. Given the small area affected relative to the size of known *Sargassum* habitat, vessel traffic is not expected to measurably reduce the biomass or productivity of *Sargassum* in the northern GOM.

Sargassum appears to originate in the northwestern GOM, and little new oil and gas development is expected to occur in this region. Given the small overall area of seafloor affected by new oil and gas development, and the new spring production of *Sargassum* that occurs in the GOM (Gower and King 2008), no detectable population level effects on *Sargassum* are anticipated.

Production. Miscellaneous discharges and vessel traffic will continue through the production phase, but they are not expected to affect *Sargassum* for the reasons described above. Contaminants in produced water discharged from the platform could affect *Sargassum* and associated biota. However, produced water is treated before discharge and must meet NPDES permitting guidelines. Consequently, impacts on *Sargassum* should be negligible. Other production activities would primarily affect subsurface habitat and are not anticipated to affect *Sargassum*.

Decommissioning. Miscellaneous discharges and vessel traffic will continue through the decommissioning phase, but they are not expected to affect *Sargassum* for the reasons described above. Platform removal activities would primarily affect subsurface communities, and while they are not anticipated to affect adult *Sargassum*, they could affect sediment-dwelling germlings. However, decommissioning impacts will be highly localized over a relatively small area.

Accidents. Spills could occur at the surface or at the seafloor. Surface spills as well as seafloor spills that rise to the surface could contact *Sargassum*, potentially resulting in complete or partial mortality of the *Sargassum* mat and lethal or sublethal effects to associated biota. Surface slicks would pose a potential threat to *Sargassum* communities until dilution and natural chemical, physical, and biological processes reduced the toxicity of the oil. Upon release, hydrocarbons would be rapidly diluted and broken down by natural processes, which would limit the potential for contact with and toxicity to Sargassum communities. The warm waters of the GOM are particularly conducive to rapid chemical and microbial breakdown of hydrocarbons.

Catastrophic Discharge Event. The effects from a CDE would depend on the location of the particular spill and on various environmental factors, including water depth, currents, and wave action. Seafloor releases could reach *Sargassum* in surface waters if the spill occurred in shallow water or if dispersants were used or the oil released was well mixed with gas. A CDE could affect a large portion of the *Sargassum* population if the spill occurred in an area of high *Sargassum* density or if toxic concentrations of oil were spread over a large area of surface water. Surprisingly little is known about the lifecycle of *Sargassum*. *Sargassum* is generally only present in the WPA and CPA in spring through early fall, and recent data suggest *Sargassum* originates in the northwest GOM and is exported from the GOM by ocean currents (Gower and King 1998). Therefore, the potential for impacts on *Sargassum* are highly dependent on when the spill occurs. *Sargassum* reproduces every year, so it is expected that the population will recover if affected by an oil spill.

4.4.6.3.2 Alaska – Cook Inlet.

Routine Operations.

Exploration and Site Development. See the Section 4.4.3.2.1 for a general discussion of the impacts of exploration and site development on water quality. During the exploration and site development phase, pelagic habitat would be affected by platform and pipeline placement, drilling activity, seismic surveys, platform lighting, and aircraft and vessel traffic (Table 4.4.6-7). Noise impacts would be greatest near the source and would temporarily reduce habitat quality for certain species. Construction lighting would alter the pelagic light regime of a small area and would attract phototaxic organisms to the platform.

Bottom water quality would be temporarily affected by turbidity from sediment disturbance during drilling, platform placement, and pipeline placement. Turbidity from bottom-disturbing activities could kill phytoplankton, although the population-level effects would be negligible. Photosynthetic productivity of phytoplankton that specialize in near-bottom habitats may be reduced if the turbidity plume reduced solar irradiance at depth. The turbidity plume would be temporary, and the effects on pelagic habitat are expected to be short term and minor.

It is assumed that drilling muds and cutting would be discharged into Cook Inlet for exploration wells only. Drilling wastes from development and production wells would be reinjected into the wells. The discharge of drilling muds and cuttings can occur near the water's surface or the seafloor, and both would create a turbidity plume that would diminish within some

TABLE 4.4.6-7 Impacting Factors by Phase and Potential Effects on Marine Pelagic Habitat in the Cook Inlet Planning Area

Impacting Factor	Disturbance[a]
Exploration and Site Development	
Vessel traffic	Noise
Seismic surveys	Noise
Miscellaneous discharges (deck washing, sanitary waste, bilge and ballast water)	Degraded water quality
Drilling and discharge of drilling muds/cuttings	Noise; degraded water quality
Pipeline trenching	Noise; turbidity
Drilling platform placement	Noise; turbidity
Offshore lighting	Alteration of light field
Production	
Production platform placement	Noise; turbidity
Production	Noise
Produced water discharge	Degraded water quality
Miscellaneous discharges (deck washing, sanitary waste)	Degraded water quality
Offshore lighting	Alteration of light field
Decommissioning	
Miscellaneous discharges (deck washing, sanitary waste, bilge and ballast water)	Degraded water quality
Platform removal	Noise, turbidity
Offshore lighting	Alteration of light field

[a] Colors indicate impact level: white = negligible; blue = minor; yellow = moderate; red = major.

distance from the release point. The turbidity plume could smother or stress small zooplankton and reduce phytoplankton productivity by decreasing the depth and intensity of light penetration. In well-mixed ocean waters, water-based drilling muds and cuttings are diluted by 100-fold within 10 m (33 ft) of the discharge and by 1,000-fold at a distance of about 100 m (330 ft) from the platform (Neff 2005). These estimates are for well-mixed water, and therefore the size of the turbidity field will vary with hydrology. Because the waters of Cook Inlet generally are vertically well mixed with a relatively large tidal range, dilution of drilling discharges would be expected to occur rapidly. Drilling wastes that are discharged are regulated by the USEPA under NPDES permits and must meet the toxicity, water quality, and discharge rate standards set by the permits, thereby reducing impacts on water quality (Neff et al. 2000; Neff 2005). Although such releases could result in temporary, localized increases in sediment load and deposition, this amount of sediment is small compared to the more than 40 million tons of suspended sediment carried annually into Cook Inlet by runoff from area rivers (Brabets et al. 1999). For all these reasons, long-term impacts from drilling waste discharges are expected to be minor.

Pelagic habitat would be affected minimally and temporarily by miscellaneous discharges (deck drainage, sanitary and domestic waste, bilge and ballast water) during site development. Such releases would be minor in quantity and would be rapidly diluted and are expected to have

only negligible impacts on pelagic habitat. In addition, many vessel and platform wastes are disposed of on land, and those that are discharged at sea must meet USEPA and/or USCG regulatory requirements that limit their environmental effects.

Overall, activities conducted during the exploration and site development phase are expected to have minor effects on pelagic habitat.

Production. Impacts from offshore lighting, miscellaneous discharges, and bottom disturbance from the movement of support vessel anchors and chains will also exist in the production phase and are described above. In addition, production noise and produced water discharge could impact pelagic habitat quality (Table 4.4.6-7). Production noise is expected to have negligible impacts on habitat quality, because production platforms are known to have high biological abundance and diversity (Stanley and Wilson 2000). Impacts on pelagic habitat from produced water should be negligible because it is assumed that all produced water will be reinjected into the well. Overall, activities conducted during the production phase are expected to have negligible effects on pelagic habitat.

Decommissioning. Impacts from vessel noise, platform lighting, and miscellaneous discharges are discussed above and would continue throughout the decommissioning phase. In addition, bottom disturbance during platform removal would temporarily disturb pelagic habitat by increasing noise and turbidity for some length of the water column. These impacts would temporarily degrade habitat quality, but conditions would return to normal as suspended sediments dispersed and resettled. The use of explosives to remove platforms is not expected. Overall, activities conducted during the decommissioning phase are expected to have minor effects on pelagic habitat.

Accidents. Impacts on pelagic habitat from accidental oil spills could result from surface releases from platforms or vessels or from seafloor releases from pipelines and the wellhead. Spills could vary in size. It is assumed that 1 large spill (≥1,000 bbl), 1 to 3 small spills between 50 and 999 bbl and 7 to 15 smaller spills between 1 and 50 bbl could occur under the proposed action (Table 4.4.2-1). Such releases would reduce the habitat value and ecosystem function of pelagic habitat at local scales. Most spills would be small and the overall impacts on pelagic habitat resources will be minor and short term, given the natural dilution and breakdown of hydrocarbons. Large spills would degrade pelagic habitat quality over a wider area and potentially reduce the habitat value and ecosystem function in the areas affected. Eventually, the oil would be broken down by natural processes, and pelagic habitat would recover. Overall, impacts on pelagic habitat from accidental hydrocarbon spills could be negligible to moderate, and impacts could be short term to long term, but no permanent degradation of pelagic habitat is expected. See Section 4.4.3.2.2 for a further discussion of the effects of oil spills on water quality in Cook Inlet.

Oil spill-response activities such as burning, skimming, and chemical release (e.g., dispersants or coagulants) could affect pelagic habitat and biota. Burning would kill pelagic biota in the burn area, and skimming would remove aquatic organisms from the water column or trap them in oiled water. The chemicals used during a spill response are toxic, but there is controversy about whether the combination of oil and dispersant is more toxic than oil

alone (NRC 2005b; Fingas 2008; Holland-Bartels and Kolak 2011). The use of dispersant would likely increase the areal extent of oil dispersion and the exposure of pelagic biota to oil. The presence of, and noise generated by, oil spill-response equipment and support vessels could temporarily disturb pelagic habitat in the vicinity of the response action, potentially reducing habitat use or disturbing migration. As with the spill itself, the location and time of the year the cleanup occurs would be an important determinant of impacts to pelagic habitat and biota.

Catastrophic Discharge Event. The PEIS analyzes a CDE of 75,000 to 125,000 bbl (Table 4.4.2-2). Oil from a CDE (Table 4.4.2-2) would form a surface slick and kill, injure, or displace pelagic biota over a large area of Cook Inlet. The extent and magnitude of the impact depend primarily on the time of year, the location of the well, the volume released, and the speed at which the well was capped. Most oil released would be rapidly diluted and broken down in the water column by physical and biological processes, so pelagic habitats would eventually recover their habitat value. Studies of water quality after the *Exxon Valdez* spill indicated that the hydrocarbon concentrations were highest in the first two months after the spill, but were well below the State of Alaska's water quality standard (Neff and Stubbenfield 1995). PAH concentrations in the water column of the sound reached background concentrations by 5 to 6 months after the spill. Toxicity tests also indicated no lethal or sublethal toxicity to pelagic phytoplankton, invertebrates, or larval fish test organisms due to exposure to water from Prince William Sound (Neff and Stubbenfield 1995). Within 1 yr of the *Exxon Valdez* spill, PAH concentrations generally declined to background levels (Boehm et al. 2007). However, in heavily oiled areas, toxic fractions of oil trapped in intertidal sediments can be periodically resuspended into the water column, where they are available to filter-feeding biota (Boehm et al. 2007). However, data from the *Exxon Valdez* spill suggest resuspended oil represented a contamination threat for biota less than 1 to 2 yr, with the highest PAH concentrations in intertidal waters (Boehm et al. 2007).

Broken ice occurs in the northern and western portions of lower Cook Inlet during fall and winter. If an open water spill were to occur at this time, the ice would contain the oil somewhat and reduce spreading. However, oil cleanup is also made more difficult in broken ice conditions. Oil from spills occurring in winter would likely freeze in ice where it could be transported hundreds of kilometers. If the spilled oil became frozen in the ice, cleanup would not be possible and the unweathered oil would be released into pelagic habitat as the ice melted. However, oil frozen into shorefast ice could be recovered using terrestrial cleanup methods, assuming the ice was stable and thick enough to support the cleanup activities.

4.4.6.3.3 Alaska – Arctic.

Routine Operations.

Exploration and Site Development. See Section 4.4.3.3.1 for a general discussion of the impacts of exploration and site development on water quality. During the exploration and site development phase, pelagic habitat would be affected by multiple activities (Table 4.4.6-8). Noise impacts would be greatest near the source and would temporarily reduce habitat quality for certain species. (See Section 4.4.7 for detailed discussions of the effects of noise on different

TABLE 4.4.6-8 Impacting Factors by Phase and Potential Effects on Marine Pelagic Habitat in the Beaufort and Chukchi Sea Planning Areas

Impacting Factor	Disturbance
Exploration and Site Development	
Vessel traffic	Noise; air emissions
Seismic surveys	Noise
Miscellaneous discharges (deck washing, sanitary waste, bilge and ballast water)	Degraded water quality
Drilling and discharge of drilling muds/cuttings	Noise; degraded water quality
Pipeline trenching	Noise; turbidity
Drilling and subsea well an platform placement	Noise; turbidity
Offshore lighting	Alteration of light field
Production	
Production platform placement	Noise; turbidity
Production	Noise
Produced water discharge	Degraded water quality
Miscellaneous discharges (deck washing, sanitary waste)	Degraded water quality
Offshore lighting	Alteration of light field
Decommissioning	
Miscellaneous discharges (deck washing, sanitary waste, bilge and ballast water)	Degraded water quality
Platform removal	Noise, turbidity
Offshore lighting	Alteration of light field

[a] Colors indicate impact level: white = negligible; blue = minor; yellow = moderate; red = major.

categories of biota.) Construction lighting would alter the pelagic light regime of a small area and would attract phototaxic organisms to the platform.

Bottom water quality would be temporarily affected by turbidity from sediment disturbance during drilling, placement of subsea wells, platforms and pipelines, and the construction of artificial islands. In addition to lethal or sublethal impacts to benthic organisms (Section 4.4.7.5), turbidity from bottom-disturbing activities could kill plankton, although the population-level effects would be negligible. Photosynthetic productivity of phytoplankton that specialize in near-bottom habitats may be reduced if the turbidity plume reduced solar irradiance at depth. However, the turbidity plume would be temporary, and the effects on pelagic habitat are expected to be short term and minor.

It is assumed that drilling muds and cuttings would be discharged into the Beaufort and Chukchi Sea Planning Areas for exploration wells only. Drilling wastes from development and production wells would be reinjected into the wells. The discharge of drilling muds and cuttings can occur near the water's surface or the seafloor, and both would create a turbidity plume that would diminish within some distance from the release point. The turbidity plume could smother

or stress small zooplankton and reduce phytoplankton productivity by decreasing the depth and intensity of light penetration. In well-mixed ocean waters, water-based drilling muds and cuttings are diluted by 100-fold within 10 m (33 ft) of the discharge and by 1,000-fold at a distance of about 100 m (330 ft) from the platform (Neff 2005). These estimates are for well-mixed water, and therefore the size of the turbidity field will vary with hydrology. Although the release of drilling muds and cuttings could result in temporary, localized impacts, the amount of material released is small compared to the more than 6.35 million tons of suspended sediment carried annually into the Beaufort Sea alone by runoff from area rivers (Neff and Associates LLC 2010). In addition, the drilling wastes that are discharged are regulated by the USEPA under NPDES permits and must not exceed the toxicity, water quality, and discharge rate standards set by the permits. These requirements greatly reduce the potential for sediment alteration and contamination.

Pelagic habitat would be affected minimally and temporarily by miscellaneous discharges (deck drainage, sanitary and domestic waste, bilge and ballast water) during site development. Such releases would be minor in quantity and rapidly diluted and are expected to have negligible impacts on pelagic habitat. In addition, many vessel and platform wastes are disposed of on land, and those that are discharged at sea must meet USEPA and/or USCG regulatory requirements that limit their environmental effects.

Overall, activities conducted during the exploration and site development phase are expected to have minor effects on pelagic habitat.

Production. See Section 4.4.3.3.1 for a general discussion of the impacts of exploration and site development on water quality. Impacts from offshore lighting, miscellaneous discharges, and bottom disturbance from support vessel anchors and chains will also exist in the production phase and are described above. In addition, production noise and produced water discharge could impact pelagic habitat quality (Table 4.4.6-8). Recent analyses indicate that the discharge of produced water into the Chukchi Sea could result in elevated PAH concentrations in shallow water areas or in the winter (MMS 2007a). However, impacts on pelagic habitat from produced water should be minor because it is assumed that all produced water will be reinjected into the well.

Overall, activities conducted during the production phase are expected to have negligible effects on pelagic habitat.

Decommissioning. Impacts from vessel noise, platform lighting, and miscellaneous discharges are discussed above and would continue throughout the decommissioning phase. In addition, bottom disturbance during platform removal would temporarily disturb pelagic habitat by increasing noise and turbidity for some length of the water column. In addition, gravel islands would be left in place where they would wash away and introduce fine sediments into the water column over time. These impacts would temporarily degrade habitat quality, but conditions would return to normal as suspended sediments dispersed and resettled. Overall, only negligible impacts on pelagic habitat are expected to result from decommissioning activities.

Accidents. See Section 4.4.3.3.2 for a detailed discussion of the effects of oil spills on water quality in the Beaufort and Chukchi Sea Planning Areas. Accidental oil spills could result from surface releases from platforms or vessels or from seafloor releases from pipelines and the wellhead. It is assumed that up to 3 large oil spills (≥1,000 bbl) up to 35 small spills (50 to 999 bbl) and up to 190 smaller spills (>1 and <50 bbl) could occur during the lease period under the proposed action (Table 4.4.2-1). Small releases would degrade bottom water quality, but the overall contaminant impacts on pelagic habitat resources will be minor and short term, given the localized nature of a small release and the natural dilution and breakdown of hydrocarbons. Large spills would degrade pelagic habitat quality over a wider area and potentially reduce the habitat value and ecosystem function in the areas affected. Eventually, the oil would be transported from the area as well as broken down by natural processes. Oil is not expected to persist in marine pelagic habitat for an extended period (Section 4.4.3.3).

Spills in open water could be contained and much of the oil removed by standard oil spill-response methods. Oil spill-response activities such as burning, skimming, and chemical release (e.g., dispersants or coagulants) could affect pelagic habitat and biota. Burning would kill pelagic biota in the burn area, and skimming would remove aquatic organisms from the water column or trap them in oiled water. The chemicals used during a spill response are toxic, but there is controversy about whether the combination of oil and dispersant is more toxic than oil alone (NRC 2005b; Fingas 2008; Holland-Bartels and Kolak 2011). The use of dispersant would likely increase the areal extent of oil dispersion and the exposure of pelagic biota to oil. The presence of, and noise generated by, oil spill-response equipment and support vessels could temporarily disturb pelagic habitat in the vicinity of the response action, potentially reducing habitat use or disturbing migration. As with the spill itself, the location and time of the year the cleanup occurs would be an important determinant of impacts on pelagic habitat and biota.

If the spill were to occur under ice or during winter, cleanup would be much more difficult because sea ice would limit access to the spill (reviewed in Holland-Bartels and Kolak 2011). For spills affecting areas of broken ice, the ice would contain the oil somewhat and reduce spreading. However, cleanup is also more difficult in broken ice conditions. Oil cleanup response plans and technologies for ice-covered areas are still evolving, and the efficacy of many proposed spill countermeasures is as yet unknown (Holland-Bartels and Kolak 2011). The oil could freeze into the ice where it could be transported hundreds of kilometers. Oil under ice or frozen in ice would undergo little weathering (Holland-Bartels and Kolak 2011) and could therefore degrade pelagic habitat for an extended period of time, with the extent of the impacts increasing with the size of the oiled area. Sea ice habitat could be degraded or lost if contact with oil spills results in lethal or sublethal effects on biota growing beneath the ice (e.g., fish, invertebrates, and algae). Overall, moderate and potentially long-term degradation of pelagic habitat could result from accidental spills occurring under ice or frozen in ice.

Catastrophic Discharge Event. The PEIS analyzes a CDE of up to 2.2 million bbl in the Chukchi Sea Planning Area and 3.9 million bbl in the Beaufort Sea Planning Area. A CDE may affect pelagic habitats (Table 4.4.2-2). The extent and magnitude of the impact depend primarily on the time of year, the location of the well, the volume released, and the speed at which the well was capped. Typically oil rises from the seafloor to the surface, forming a

surface slick capable of traveling greater than 50 km (31 mi) (MMS 2007a). Pelagic organisms could be exposed to lethal or sublethal concentrations of hydrocarbons or mixtures of hydrocarbons and dispersants (if used). Pelagic habitats would eventually recover their habitat value as hydrocarbons broke down and were diluted. Recovery time would vary with local conditions and the degree of oiling. Overall, impacts on pelagic habitat from accidental hydrocarbon spills in open water could range from negligible to moderate, and impacts could be short term to long term, but no permanent degradation of pelagic habitat is expected.

4.4.6.3.4 Conclusion. Impacts on pelagic habitat in the GOM, Cook Inlet, and Beaufort and Chukchi Sea Planning Areas could occur during the exploration through decommissioning phases. In all Planning Areas, most impacts would be negligible to minor for routine Program activities and would range from short term for the exploration, site development, and decommissioning phases to long term for those impacts occurring throughout the production phase. Impacts would primarily occur from turbidity generated by bottom-disturbing activities. Temporary reduction in habitat quality could also result from the discharge of produced water and drilling muds and cuttings. Overall, no permanent degradation of pelagic habitat is anticipated to result from routine OCS activities because of the nature of the impacts and the small area potentially affected compared to the total area available.

Most accidental oil spills would be small and result in only negligible, localized impacts on pelagic habitat. However, large or CDE spills could potentially reduce habitat quality over potentially much broader areas. The effects from oil spills would depend on the size, timing, duration, and location of the spill and on various environmental factors. Pelagic habitat in nearshore areas would likely have the greatest potential for long-term contamination. Unique pelagic habitat and associated biota such as *Sargassum* mats in the GOM and sea ice in the Arctic could also be affected by oil spills. Contact with spilled oil could completely or partially kill *Sargassum* and cause lethal or sublethal effects to associated biota.

In the Alaskan planning areas, oil could become trapped under sea ice for an extended period, where it would remain relatively unweathered and capable of being transported large distances. Oil under ice or frozen in ice could therefore degrade pelagic habitat for an extended period of time with the extent of the impacts increasing with the size of the oiled area; the largest area affected would occur with a CDE-level spill. Sea ice habitat could be degraded or lost if contact with oil spills results in lethal or sublethal effects on biota growing beneath the ice. In all pelagic habitats, hydrocarbons would be diluted and broken down by natural processes, and pelagic habitat would eventually recover its ecological functions.

4.4.6.4 Essential Fish Habitat

4.4.6.4.1 Gulf of Mexico. As described in Section 3.7.4.1, most of the coastal and marine waters of the GOM are considered EFH for life stages of one or more managed species, and any oil and gas development activity that degrades coastal or marine benthic and pelagic environments would affect EFH. Also, several offshore banks are considered HAPC

(Section 3.7.4.1). EFH consists of benthic and water column habitats in marine coastal areas. The potential effects of exploration, site development, and production activities on these habitats are discussed in individual sections including coastal and estuarine habitats (Sections 4.6.1.1), marine benthic habitats (Section 4.4.6.2.1), and the marine water column (Section 4.4.6.3.1). Impacts on fish and fisheries from the Program are discussed in Sections 4.4.7.3.1 and 4.4.1.1.1.

Routine Operations.

Exploration and Site Development. During the exploration and site development phase, impacts on EFH could occur as a result of drilling and drilling waste discharge, seismic surveys, and the placement of drilling units, production platforms, and pipelines. Noise from drilling, construction, and seismic surveys would temporarily disturb EFH and potentially kill, injure, or displace managed species. See Section 4.4.7.3.1 for a discussion of the impacts of noise on fish. It is anticipated that behavioral and distributional responses to such acoustic stimuli would be small and that these temporary effects would not persist for more than several hours after acoustic surveys are ended. All the noise associated with these activities would be temporary and affect a small area; therefore, it is expected to result in only negligible to minor impacts on EFH and managed species in the northern GOM.

The vast majority of marine EFH affected by the Program would be soft sediments. The estimated bottom habitat that may be directly disturbed by new pipeline and platform installation ranges from 2,150 to 14,000 ha (5,313 to 34,594 ac) over the entire GOM. Pipelines placed on the sediment surface would eliminate natural soft sediment EFH. Sediment-disturbing activities would result in increased turbidity, which would lower the water quality of EFH in small areas for a limited time. Although mobile, adult managed species are not likely to be directly affected by bottom disturbance, bottom-disturbing activities could injure, displace, or kill early life stages of managed species or bury the benthic prey of managed species. Bottom disturbance would affect a small area relative to the size of the GOM, and no population-level effects on managed species are expected. Also, FPSO systems could potentially be used in deep water, and would reduce the need for pipelines.

The potential for bottom-disturbing activities to affect sensitive marine EFH such as hard-bottoms, deepwater corals, and chemosynthetic communities would be reduced by stipulations requiring buffers between these features and bottom-disturbing activities (Section 4.4.6.2.1). Up to two FPSO systems may be employed for deepwater wells. Under the FPSO system, oil would be transported from the well to a surface vessel and ultimately to shore. By eliminating the need for pipelines, an FPSO system would greatly reduce bottom disturbance and the chance for disturbing deepwater corals and chemosynthetic communities. Topographic features classified as HAPC are also protected by the Topographic Features stipulation, which prohibits direct bottom disturbance or the deposition of drilling muds and cuttings in areas containing such habitat. Therefore, HAPC should be minimally affected by exploration and site development activities.

Coastal EFH could be affected by the estimated 0 to 12 new pipeline landfalls that are anticipated under the proposed action. Routing the pipelines through the most sensitive coastal EFH (i.e., mangroves and seagrass) is not likely to be permitted, but saltmarsh wetlands may be

permanently lost due to construction activity. The overall area of coastal EFH affected by oil and gas activities would be minor, and impacts are not expected to permanently reduce the EFH available to managed species or result in population-level impacts on managed species.

A total of up to 4,700 exploration and production wells will be drilled in the WPA and CPA under the proposed action. The subsequent discharges of drilling cuttings and muds would alter the grain size distribution and chemical characteristics of sediments immediately surrounding the drill sites and for some distance around the wells (typically less than 1 km [3,281 ft]), depending on the depth at which the material is discharged (Kennicutt et al. 1994; Continental Shelf Associates, Inc. 2004, 2006). The deposited material could alter benthic habitat for EFH prey species and potentially affect spawning sites, which are often chosen on the basis of sediment grain size. Elevated sediment metal and PAH concentrations near the well (<500 m [1,640 ft]) would also likely result from drilling discharge, but with the exception of some metals, elevated tissue concentrations of contaminants have not been found in demersal fish or their benthic invertebrate food sources sampled around platforms in the GOM (Kennicutt et al. 1994; Continental Shelf Associates, Inc. 2004, 2006).

It is expected that the overall impacts of exploration and site development activities on marine EFH would be moderate, and impacts are not expected to permanently reduce the EFH available to managed species or result in population-level impacts on managed species. Recovery rates of EFH habitat and benthic food resources could range from short term to long term depending on the spatial and temporal scope of the disturbance.

Production. The primary production activities that could affect EFH include chronic bottom disturbance from the movement of platform mooring structures and the discharge of produced water. Bottom disturbance represents chronic, long-term, but moderate and localized impacts on marine EFH. NPDES permits would limit the potential for produced water discharges to contaminate sediment and water column EFH. Fish and invertebrates collected near platforms in the GOM do not appear to bioaccumulate the common contaminants in produced water such as radionuclides, metals, and hydrocarbons and do not exceed the USEPA-specified tissue concentrations considered to be harmful (Continental Shelf Associates, Inc. 1997).

After new platforms have been established, sessile fouling organisms would colonize the underwater portions of the structures, which would attract managed reef species such as snapper, grouper, and some coastal migratory pelagics. Over time, this could change the spawning, breeding, and feeding patterns of some managed fish. The effects of artificial reefs on fish populations are controversial (Section 4.4.7.3.1), as the reefs may benefit some species and adversely affect others. The benefit or detriment of artificial reefs as habitat depends on how fisheries on the reef are managed and on the individual life histories and habitat requirements of the species present (Bohnsack 1989; Macreadie et al. 2011). Unless platforms are permitted to remain, the reef function of the platforms would last only through the production phase.

It is expected that the effects of production activities on marine EFH would be minor, and impacts are not expected to permanently reduce the EFH available to managed species or result in population-level impacts on managed species.

Decommissioning. During decommissioning and structure removal, both explosive and nonexplosive methods may be used to sever conductors and pilings. With the exception of some water quality concerns, nonexplosive removals (e.g., abrasive, mechanical, or diver cutters) have little impact on the fish resources. With explosive removal, impacts on managed species range from disturbance and habitat loss to injury and death. From 150 to 275 explosive platform removals are expected, and most would occur in relatively shallow water. Floating platforms would not require explosive removals, although the seafloor would be temporarily disturbed by the removal of platform mooring structures. Removing structures would also remove the associated fouling communities that serve as prey for managed fish species, thereby forcing these species to relocate to other foraging areas. Pipelines would typically be left in place. Pipelines on the sediment surface could periodically move, resulting in chronic bottom disturbance to soft sediment EFH. Pipelines not buried, in both shallow and deepwater, would provide hard substrate and habitat. Overall, it is expected that the effects of decommissioning activities on marine EFH would be minor, and impacts are not expected to permanently reduce the EFH available to managed species or result in population-level impacts on managed species.

Accidents. Small accidental hydrocarbon releases occurring in surface or near-bottom offshore habitats would temporarily degrade EFH in the vicinity of the release, but are not likely to reach large-scale sensitive marine EFH such as hard-bottom EFH (Section 4.4.6.2.1). Large spills (≥1,000 bbl) have the potential to degrade EFH over a wider area that potentially reduce the habitat value and ecosystem function in the areas affected. Impacts would be greatest if oil from the spill were to contact sensitive marine habitat such as seagrass beds and wetlands. However, in most cases, the area affected would likely be small compared to the overall resources and eventually the oil would be transported from the area as well as broken down by natural processes.

Catastrophic Discharge Event. The PEIS analyzes a CDE up to 7.2 million bbl (Table 4.4.2-2). However, much of the hydrocarbon would likely be consumed relatively quickly by bacteria (Camilli et al. 2010; Kessler et al. 2011). The potential for oil from an accidental release to reach marine HAPC at lethal concentrations would be reduced by the Topographic Features Stipulation prohibiting oil and gas development near these features. However, topographic features as well as unique deepwater communities could be partly or completely destroyed if contacted by a large quantity of oil. Oil from surface and subsurface spills contacting nearshore EFH has the greatest potential to degrade EFH such as intertidal and estuarine habitats with emergent and submerged vegetation, sand and mud flats, and shell and oyster reefs. These areas provide food and rearing substrate for a variety of federally managed juvenile fish and shellfish. Most nearshore spills would be small so they are not likely to degrade a large fraction of EFH because the hydrocarbons would be rapidly metabolized and diluted. However, moderate and long-term but temporary degradation of EFH could occur if a catastrophic coastal area was oiled following a large offshore spill. In most cases, the coastal habitat would recover as the hydrocarbons were metabolized or buried, but marsh grasses currently stressed by subsidence may not recover.

A catastrophic spill occurring offshore could affect all life stages of federally managed species and their food sources. Managed species could be affected by the spill directly due to lethal or sublethal toxicity or indirectly by long-term reduction in food resources and juvenile

and reproductive habitat. Adult life stages will likely avoid heavily oiled areas, although sublethal exposures are possible (Roth and Baltz 2009). Early life stages of managed species may be most vulnerable to hydrocarbon spills, which could trap and kill planktonic eggs and larvae in the affected area. Mortality to pelagic eggs and larvae contacting the oil could be particularly high in the case of a catastrophic spill at the surface that spreads over a wide area. In addition to the size of the spill, the location of the spill and the season in which the spill occurred would be important determinants of the impact magnitude. For example, catastrophic spills occurring during recruitment periods or spills that oil critical spawning areas could result in temporary population-level impacts on managed fish and invertebrates. Also, managed species currently in serious population decline, such as sharks and bluefin tuna, may experience population-level impacts if the spill were to kill a significant number of eggs and larvae in a given year. For example, the HAPC for bluefin tuna extends from the 100 m (328 ft) isobath and could also be affected by oil spills, and population-level impacts to Bluefin tuna could result from catastrophic spills (Teo et al. 2007; Atlantic Bluefin Tuna Status Review Team 2011). The effects of a CDE on such managed species could be major.

Wave and wind action, weathering, and biological degradation would dissipate oil in the surface water, and suitable habitat condition would eventually return. The period of time needed to reestablish appropriate habitat conditions following a spill would depend upon the characteristics of the individual spill and would be related to many factors, including the EFH resource affected, the location of the spill, the nature of transporting currents, the magnitude of the spill, and the chemical characteristics of the spilled oil. With the exception of sensitive habitats such as corals and chemosynthetic communities, EFH affected by oil spills is expected to fully recover within a few years. Sensitive habitats with slow-growing biota may take longer to recover or may not recover at all. Overall, accidental large spills could have negligible to moderate effects on marine EFH. The effects for a CDE could be more severe depending on the volume, duration, and persistence.

4.4.6.4.2 Alaska – Cook Inlet. The Cook Inlet Planning Area contains EFH for a variety of fish and invertebrate species that can be broadly categorized into three groups based upon the relevant Fishery Management Plans (FMPs): Gulf of Alaska groundfish, Alaska salmon, and Alaska weathervane scallop. As identified in the FMPs, the EFH includes bottom and water-column habitat in streams, lakes, ponds, wetlands, and marine and coastal waters. Consequently, activities that degrade these aquatic habitats could adversely affect EFH for one or more species. For the purposes of this analysis, potential impacts on EFH resources in the Cook Inlet Planning Area and adjacent waters are generally addressed. EFH in Cook Inlet potentially affected by exploration, site development, and production activities are discussed in detail in individual sections including coastal and estuarine (Sections 4.4.6.1.2) and marine benthic habitats (Section 4.4.6.2.2) and the marine water column (Section 4.4.6.3.2). Impacts on Cook Inlet fish and fisheries from the Program are discussed in (Sections 4.4.7.3.2 and 4.4.11.2). Because of the connection with adjacent marine areas, this evaluation also considers the potential for effects on fish populations in the overall Gulf of Alaska.

Routine Operations.

Exploration and Site Development. During the exploration and site development phase, the primary impacts on EFH could occur as a result of drilling and drilling waste discharge, seismic surveys, and the placement of drilling units, production platforms, and pipelines. Each seismic survey would be completed within weeks. While it is anticipated that there would be no permanent population-level effects on managed species in Cook Inlet or the Gulf of Alaska from seismic surveys, individual fishes, especially egg and larval life stages in close proximity (1 to 5 m [3 to 16 ft]) to air gun arrays (Dalen and Knutsen 1986; Holliday et al. 1987; Turnpenny and Nedwell 1984), could suffer mortality or injury, and adult fishes located farther from the noise could exhibit short-term avoidance and behavioral alteration. The migration of managed salmon could also be temporarily disrupted. Additional sources of noise from drilling, construction of platforms and pipelines, and boat traffic could also temporarily disturb or displace individual fish. All the noise associated with these activities would be temporary and is expected to result only in minor impacts on EFH and managed species in Cook Inlet.

The vast majority of marine EFH affected by the Program would be soft sediments. It is anticipated that 1.5 to 4.5 ha (4 to 11 ac) of seafloor habitat in the Cook Inlet Planning Area could be affected by platform construction under the proposed action. It is also estimated that 80 to 241 km (50 to 150 mi) of new pipelines would be installed offshore. Pipelines could be trenched or installed and anchored on the sediment surface. Placing the pipeline on the sediment surface could result in permanent loss of soft sediment EFH. Ground-disturbing activities would result in increased turbidity, which would lower the water quality of EFH in small areas for a limited amount of time. Although adult managed fish are not likely to be killed or injured during bottom disturbance, bottom-disturbing activities could injure, displace, or kill early life stages of managed species or bury the benthic prey of managed species. Scallops have less mobility than fish and may be killed, injured, or displaced by bottom disturbance. The migration of managed salmon could also be temporarily disrupted by bottom disturbance.

Pipeline construction in nearshore subtidal habitats could damage marine plant EFH by mechanically removing the plants or smothering them through sedimentation. Areas containing high densities of aquatic vegetation are typically avoided during construction activities due to a lease stipulation calling for protection of important or unique biological populations or habitats. Pipeline crossings of streams could affect EFH for several life stages of anadromous salmon, including eggs, larvae, juveniles, and adults. The Alaska Department of Fish and Game (ADF&G) reviews plans for construction activities for potential impacts on salmon and other fish species and requires permits to be issued before stream pipeline crossings can be installed. Therefore, it is anticipated that impacts on anadromous salmon from freshwater pipeline crossings would be minimized through appropriate permitting and management actions once site-specific assessments are conducted.

It is anticipated that 4 to 12 exploration and delineation wells and 42 to 114 production wells will be drilled in Cook Inlet under the proposed action. It is assumed that drilling muds and cuttings from the exploration and delineation wells would be discharged into Cook Inlet and could temporarily affect benthic and water-column EFH resources. While the toxicity of those cuttings is expected to be low and within permitted levels, the drilling wastes that are discharged

would temporarily increase turbidity and sediment deposition, and small numbers of managed species could be temporarily displaced. In the mixing area near the discharge site, eggs and larvae of managed groundfish and scallops could be killed or injured. Settlement of discharged cuttings on the seafloor could smother some prey species and change substrate composition in the area where the cuttings settle. However, the discharge of all drilling muds and cuttings would be subject to NPDES permitting requirements that would greatly reduce the impacts on EFH and managed species.

Overall, exploration and site development activities are expected to result in moderate impacts on EFH and managed species. Recovery of EFH habitat and benthic food resources could range from short term to long term.

Production. The primary production activities that could affect EFH include bottom disturbance from anchors and the discharge of produced water. Bottom disturbance represents a chronic, long-term but moderate and localized impact on EFH. It is assumed that all produced water would be disposed of by injection into permitted disposal wells. Therefore, the effects of produced water discharges on sediment and water-column EFH are expected to be minimal.

After new platforms have been established, sessile fouling organisms would colonize the underwater portions of the structures, and they would attract prey for unmanaged species as well as managed species such as rockfish. Over time, this could change the spawning, breeding, and feeding patterns of some managed fish.

Overall, production activities are expected to result in minor impacts on EFH and managed species.

Decommissioning. During decommissioning and structure removal, only nonexplosive methods would be used to sever conductors and pilings. Nonexplosive removals (e.g., abrasive, mechanical, or diver cutters) are expected to have little impact on EFH resources and managed species (Section 4.4.7.3.2). Many platforms would be floating, and the seafloor would be temporarily disturbed by the removal of platform mooring structures. Removing structures would also remove the associated biological communities that serve as prey for managed fish species, thereby forcing these species to relocate to other foraging areas. Overall, decommissioning activities are expected to result in negligible impacts on EFH and managed species.

Accidents. Most accidental hydrocarbon releases in the Cook Inlet Planning Area would be small and would result in only negligible effects on EFH and managed species, while larger releases could have a greater adverse impact on EFH and various life stages of managed species depending upon the timing, location, and magnitude of an oil spill. Impacts from spills would be greatest if a large spill occurred during a reproductive period or contacted a location important for spawning or growth such as intertidal and nearshore subtidal habitats. Small releases would degrade bottom water quality, but the overall contaminant impacts on pelagic habitat resources will be minor and short-term, given the localized nature of a small release and the natural dilution and breakdown of hydrocarbons. Large spills have the potential to degrade EFH over a wider area than small spills and could potentially reduce the habitat value and ecosystem

function in the areas affected. Eventually, the oil would be transported from the area as well as broken down by natural processes.

The period of time needed to reestablish appropriate EFH conditions following a spill would depend upon the characteristics of the individual spill and many factors, including the location of the spill, the nature of transporting currents, the magnitude of the spill, and the chemical characteristics of the spilled oil. For example, while most of the waters within the Cook Inlet Planning Area remain open throughout the winter, currents could transport oil under ice to surrounding areas. Oil spilled under ice is more difficult to locate and clean than surface spills. As evidenced by effects of the *Exxon Valdez* oil spill, recovery of some EFH resources could occur within less than a year, while shoreline resources could continue to be affected at some level for 10 yr or more (*Exxon Valdez* Oil Spill Trustee Council 2009a). Wave and wind action, weathering, and biological degradation would dissipate spilled oil in the surface water, and water-column EFH resources would likely recover most quickly. Sediments could recover much more slowly. Following the *Exxon Valdez* oil spill, contamination persisted in some freshwater benthic habitats for at least 4 yr (Murphy et al. 1999) and oil contaminating intertidal sediments continued to reduce survival of eggs for anadromous salmon for a number of years after the spill (Peterson et al. 2003). Similarly, intertidal sediments and benthic communities are still listed as recovering (*Exxon Valdez* Oil Spill Trustee Council 2010c). Like EFH, managed species would eventually recover from catastrophic spills, although the recovery could take many years. The *Exxon Valdez* Oil Spill Trustee Council evaluated the status of several managed species following the *Exxon Valdez* spill, including sockeye salmon, pink salmon, and rockfish. The salmon were listed as recovered within a decade after the spill and rockfish as very likely recovered (*Exxon Valdez* Oil Spill Trustee Council 2010c).

Overall, accidental hydrocarbon releases could have negligible to moderate effects on EFH largely depending on the size of spill, location, environmental factors, and uniqueness of the affected EFH.

Catastrophic Discharge Event. The PEIS analyzes a CDE of 75,000 to 125,000 bbl (Table 4.4.2-2). Deeper subtidal sediment EFH may be less affected because hydrocarbons would tend to float over the sediments. The potential for severe impacts from accidents would be greatest from oil washed inshore into wetlands, intertidal zones, and shorelines where spilled oil could contaminate nearshore habitat and associated prey species. Spilled oil could also kill kelp and other marine plants that provide food and nursery habitat for managed salmon and groundfish. Spilled oil concentrated along the coastline at the mouths of streams or rivers may disrupt migration patterns for some species, such as eulachon or salmon, by causing fish to avoid contaminated areas. In some cases, toxic fractions (e.g., PAHs) of spilled oil could also reach freshwater areas where salmon eggs are deposited in stream bottoms. PAHs in the parts-per-billion range can cause sublethal impacts on developing fishes (MMS 2007a). Depending on the timing and severity of an oil spill, adult anadromous fish migrating from marine waters to freshwater to spawn and juveniles migrating seaward from freshwater could be harmed by high concentrations of hydrocarbons. Large, mobile adult managed species in Cook Inlet would likely avoid hydrocarbon spills by temporarily moving to other areas. However, small obligate benthic species as well as pelagic eggs and larvae of some managed species and organisms that serve as their prey may be unable to avoid the oil.

4.4.6.4.3 Alaska – Arctic. There are two FMPs designating EFH in the Beaufort/Chukchi Planning Areas: one for Alaska salmon and one for arctic fishes (NPFMC and NMFS 1990; NPFMC 2009). Activities that degrade these aquatic habitats could adversely affect EFH for one or more species. For the purposes of this analysis, potential impacts on EFH resources in the Beaufort/Chukchi Planning Area and adjacent waters are generally addressed. EFH in the Beaufort and Chukchi Seas potentially affected by exploration, site development, and production activities are discussed in detail in individual sections including coastal and estuarine (Sections 4.4.6.13) and marine benthic habitats (Section 4.4.6.2.3) and the marine water column (Section 4.4.6.3.3). Impacts on Beaufort/Chukchi Planning Area fish and fisheries from the Program are discussed in Section 4.4.7.3.3 and Section 4.4.11.3.

Routine Operations.

Exploration and Site Development. During the exploration and site development phase, impacts on EFH could occur as a result of drilling and drilling waste discharge, seismic surveys, the placement of subsea drilling units, production platforms, pipelines, and construction of artificial islands. While it is anticipated that there would be no permanent population-level effects on fishes in the Beaufort/Chukchi Planning Area from seismic surveys, individual fishes, especially egg and larval life stages, in close proximity (1 to 5 m [3 to 16 ft]) to air gun arrays could suffer mortality or injury, and juvenile and adult fishes located farther away could exhibit temporary behavioral alteration including spawning/migratory behavior (Dalen and Knutsen 1986; Holliday et al. 1987; Turnpenny and Nedwell 1994). Additional sources of noise from activities such as drilling, platform and pipeline placement, and boat traffic could also temporarily disturb or displace individual fish. All the noise associated with these activities would be temporary and affect a small area and therefore is expected to result in only minor impacts on EFH and managed species in the Beaufort/Chukchi Planning Area.

The vast majority of marine EFH affected by the Program would be soft sediments on the continental shelf in less than 91 m (300 ft) of water. Under the proposed action, up to 13.5 ha (33 ac) of seafloor habitat could be permanently covered by up to 9 artificial islands, and as much as 567 ha (1,401 ac) of seafloor habitat could be disturbed by pipeline placement. Pipelines located in water less than 50 m (165 ft) would be trenched to avoid damage from ice scour. In addition, up to 92 subsea production wells could be constructed. The construction of artificial islands and the placement of pipelines on the sediment surface would alter existing seafloor EFH and the associated communities. Sediment-disturbing activities would increase turbidity, which would lower the water quality of EFH in small areas for a limited amount of time, typically causing fish to leave the areas until water quality improves. The migration of managed salmon could also be temporarily disrupted by bottom disturbance, although salmon are relatively uncommon in the Beaufort and Chukchi Seas. Although adult managed species are less likely to be killed or injured during bottom disturbance, bottom-disturbing activities could injure, displace, or kill early life stages of managed species or bury the benthic prey of managed species. However, the sediments would eventually settle out and would not experience permanent effects. Pipeline trenching and island construction could damage marine plants associated with EFH by mechanically removing the plants or smothering them through sedimentation. Marine vegetation is concentrated in relatively few areas within the Beaufort Sea and Chukchi Sea Planning Areas (e.g., the Stefansson Sound Boulder Patch Community), and

impacts on such areas are typically minimized during construction activities by stipulations protecting sensitive biological habitats.

It is assumed that drilling muds and cuttings from the exploration and delineation wells would be discharged into the Beaufort and Chukchi Seas. The discharges of drilling fluids and cuttings could temporarily affect some EFH resources. While the toxicity of those cuttings is expected to be low and within permitted levels, the drilling wastes that are discharged would temporarily increase turbidity and sediment deposition, and a small number of managed species could be temporarily displaced. In the mixing area near the discharge site, eggs and larvae of managed arctic fishes could be killed or injured. Settlement of discharged cuttings on the seafloor could smother some prey species and change substrate composition in the area where the cuttings settle. However, the discharge of all drilling muds and cuttings would be subject to NPDES permitting requirements that would greatly reduce the impacts on EFH and managed species.

Gravel island and ice road construction may affect freshwater EFH depending on the location and timing of the activities. Gravel for island construction is mined from river bars, and water for construction of ice roads is pumped from local rivers and lakes to desired areas to build a rigid surface. Removal of gravel and water could increase turbidity and reduce the water quality of EFH in affected rivers. The ADF&G requires reviews of such activities for potential impacts on salmon and other fish species and requires permits to be issued before gravel mining and water withdrawals can be initiated.

Overall, the impacts of exploration and site development activities on EFH and managed species are expected to be moderate.

Production. The primary production activities that could affect EFH include bottom disturbance from anchors and the discharge of produced water. Bottom disturbance represents chronic, long-term, but moderate and localized impacts on EFH. Pipelines not buried would be anchored in place which would minimize their movement and potential to disturb sediment EFH. It is assumed that all produced water would be disposed of by injection into permitted disposal wells. Therefore, the effects of produced water discharges on sediment and water-column EFH are expected to be minimal. Platform and island construction will introduce floating or benthic hard substrate that may attract managed species and their prey. Over time, this could change the spawning, breeding, and feeding patterns of some managed fish.

Chronic discharges of contaminants in ice roads would occur during every breakup from fluids entrained in the roads. Entrained contaminants from vehicle exhaust, grease, antifreeze, oil, and other vehicle-related fluids could potentially affect EFH. These discharges are not expected to be major; however, they would exist over the life of the field.

Overall the impacts of production activities on EFH and managed species are expected to be minor.

Decommissioning. Bottom disturbance during platform removal would temporarily disturb EFH by increasing noise and turbidity for some length of the water column. During

decommissioning and structure removal, only nonexplosive methods would be used to sever conductors and pilings. Nonexplosive removals (e.g., abrasive, mechanical, or diver cutters) are expected to have little impact on EFH resources and managed species (Section 4.4.7.3.2). These impacts would temporarily degrade EFH quality and potentially kill or injure managed species, but conditions would return to normal as suspended sediments dispersed and resettled, and the long-term impacts on EFH would be negligible. Removing structures would also remove the associated fouling communities that serve as prey for managed fish species, thereby forcing these species to relocate to other foraging areas. Gravel islands would be left in place where they would wash away and introduce fine sediments into the water column over an extended period of time.

Overall, only negligible impacts on EFH are expected to result from decommissioning activities.

Accidents. Most accidental hydrocarbon releases in the Beaufort and Chukchi Planning Areas would be small. Small releases would degrade bottom water quality, but the overall contaminant impacts on pelagic habitat resources will be minor and short-term, given the localized nature of a small release and the natural dilution and breakdown of hydrocarbons. Large spills would degrade EFH over a wider area than small spills and potentially reduce the habitat value and ecosystem function in the areas affected. Impacts from spills would be greatest if a large spill occurred during a reproductive period or contacted a location important for spawning or growth such as intertidal and nearshore subtidal habitats. Eventually, the oil would be transported from the area as well as broken down by natural processes.

Toxic fractions of oil in the parts-per-billion range can cause sublethal impacts on developing fishes (MMS 2007a). Depending on the timing and severity of an oil spill, adult anadromous fish migrating from marine waters to fresh water to spawn and juveniles migrating seaward from freshwater could be harmed by high concentrations of hydrocarbons. Most adult managed species in the Beaufort and Chukchi Seas are highly mobile and would likely avoid oil spills by temporarily moving to other areas. However, small obligate benthic species and egg and larval life stages of managed species as well as planktonic organisms that serve as their prey may be unable to avoid hydrocarbon spills. In addition, oil reaching the intertidal zone can persist in the sediments and cause sublethal impacts on fish eggs and larvae for multiple years (Peterson et al. 2003).

Wave and wind action, weathering, and biological degradation by microbes would dissipate oil in the surface water, and EFH would be reestablished after some period of time. The period of time needed to reestablish appropriate EFH conditions following a spill would depend upon the characteristics of the individual spill and would be related to many factors, including the habitat affected, the location of the spill, the nature of transporting currents, the magnitude of the spill, and the chemical characteristics of the spilled oil. Studies following the *Exxon Valdez* spill found that water column EFH recovered in less than 1 to 2 years (Boehm et al. 2007). Subtidal habitat and communities are considered to be very likely recovered by the *Exxon Valdez* Oil Spill Trustee Council (2010c), but as of 2010, intertidal sediments and communities are considered to still be recovering from the *Exxon Valdez* spill (*Exxon Valdez* Oil Spill Trustee Council 2010c). Impacts to kelp habitat from an oil spill could

be long-term, but are not expected to be permanent. Laminaria beds oiled by the *Exxon Valdez* spill recovered within 10 years (Dean and Jewett 2001). Overall, accidental oil spill could have negligible to moderate effects on EFH largely depending on the size of the spill, its location, environmental factors, and the uniqueness of the affected EFH.

Catastrophic Discharge Event. The PEIS analyzes a CDE up to 2.2 million bbl in the Chukchi Sea Planning Area and up to 3.9 million bbl in the Beaufort Sea Planning Area. Deeper subtidal sediment EFH may be less affected because hydrocarbons would tend to float over the sediments. The potential for severe impacts from accidents would be greatest if large quantities of oil from catastrophic spills washed inshore into wetlands, intertidal zones, and shorelines where spilled oil could contaminate nearshore EFH and associated prey species. Spilled oil reaching wetland habitat could kill vegetation and associated invertebrates and small fish that are prey species for managed species. Deeper subtidal sediment EFH may be less affected because hydrocarbons would tend to float over the sediments. Similar effects are expected to those described above, but managed species that suffer large losses of early life stages or that are currently in decline could suffer population-level effects from catastrophic oil spills. A single catastrophic spill could cause long-term declines of managed species that rely on shallow coastal, intertidal, and freshwater areas. Spilled oil could smother kelp and other marine plants, reducing habitat and substrate for potential prey of managed species. Oil spilled under ice is more difficult to locate and remove than surface spills. Since weathering would be greatly reduced by ice cover, managed species with mobility could continue to be harmed or killed as they drift into the trapped oil. In addition, the sea ice that provides habitat for managed species such as juvenile arctic cod could be uninhabitable.

4.4.6.4.4 Conclusion. Most impacts on EFH from oil and gas exploration and production activities would likely result from bottom disturbance and the creation of artificial reefs by production platforms. The magnitude of impacts on sensitive marine and coastal EFH would be limited by specific lease stipulations and site-specific analyses conducted for particular lease sales. Managed species, particularly egg and larval stages, could be killed, injured, or displaced from the immediate vicinity of oil and gas activities. No more than moderate impacts on EFH are expected to result from routine Program activities and no population-level impacts on managed species are expected. Recovery of EFH habitat and benthic food resources from oil and gas activities would range from short term to long term.

The severity of effects of accidental hydrocarbon spills on EFH would depend on the size of the spill, its location, environmental factors, and the uniqueness of the affected EFH. While most accidents would be small and would have relatively small impacts on EFH, large or CDE-level spills that reach coastal EFH could have more persistent impacts and could require remediation. A single CDE spill could cause long-term declines of managed species that rely on shallow coastal, intertidal, and freshwater areas. Adult managed species would probably not be greatly affected by a hydrocarbon spill in open water areas, but small obligate benthic species, eggs, larvae, and some managed species and their prey could experience lethal and sublethal effects from contact with hydrocarbons. In Alaskan waters, spills occurring under ice could result in long-term degradation of EFH and managed species because of the cleanup difficulties; largest impacts would be incurred with a CDE-level spill. Managed species that suffer large

losses of early life stages or that are currently in decline could suffer population-level effects from catastrophic oil spills.

4.4.7 Potential Impacts on Marine and Coastal Fauna

4.4.7.1 Mammals

This section addresses the potential impacts to both marine mammals and terrestrial mammals in context of each program area. It should be noted that both NMFS and FWS have statutory and regulatory mandates under the ESA and MMPA for mammals. Under the MMPA (16 USC 1371; 50 CFR Subpart 1), the taking of marine mammals without a permit or exemption is prohibited. The term "take" under the MMPA means "to harass, hunt, capture, kill or collect, or attempt to harass, hunt, capture, kill or collect." The MMPA has defined takes by "harassment" in two ways: (1) level A harassment is "any act of pursuit, torment, or annoyance which has the potential to injure a marine mammal or marine mammal stock in the wild," and (2) level B harassment is "any act of pursuit, torment, or annoyance, which has the potential to disturb a marine mammal or marine mammal stock in the wild by causing disruption of behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering but which does not have the potential to injure a marine mammal or marine mammal stock in the wild." In 30 CFR 250 Subpart B, BOEM requires operators of Federal oil and gas leases to meet the requirements of ESA and MMPA. The regulations outline the environmental, monitoring, and mitigation information that operators must submit with proposed plans for exploration, development, and production.

4.4.7.1.1 Gulf of Mexico.

Marine Mammals. There are 29 species of marine mammals, including six endangered whale species and the endangered West Indian manatee, that may occur in the northern GOM (Section 3.4.4.2.1), and which therefore could be affected by normal operations associated with the proposed action.

Routine Operations. As part of the proposed action, 1,000 to 2,100 exploration and delineation wells and 1,300 to 2,600 development and production wells are projected to be drilled, while 200 to 450 new platforms and up to 2 FPSOs are projected to be used. Additional activities planned as part of the proposed action include 3,862 to 12,070 km (2,400 to 7,500 mi) of new pipeline (Table 4.4.1-1). Although a specific scenario for geophysical operations has not been prepared, exploratory and on-lease seismic surveys are expected to result from the Program. Table 4.4.7-1 illustrates how each of the impacting factors associated with OCS oil and gas development may affect marine mammals and their habitats, while Figure 4.4.7-1 presents a conceptual model of potential impacting factors for marine mammals from oil- and gas-related activities (including accidental oil spills).

TABLE 4.4.7-1 Impact Factor Data Matrix for Marine Mammals[a]

Resource Receptor Category Potentially Affected	O&G Impacting Factor								
		Noise							
	Collisions with Support Vessels	Seismic Exploration	Construction, Operation, and Decommissioning	Presence of Support Vessels	Onshore Construction and Operation	Offshore Infrastructure Construction, Operation, Decommissioning	Produced Water, Drill Cuttings and Mud	Solid Wastes and Debris	Accidental Oil Spills
Individuals (adults and juveniles)	Injury from ship strikes	Injury; disruption of normal behavior	Disruption of normal behavior	Disruption of normal behavior	Physical disturbance or reduced habitat quality associated with noise and/or human presence	Physical disturbance or reduced habitat quality associated with noise and/or human presence	Toxicity	Ingestion and/or entanglement	Fouling, toxicity
Onshore Habitats (e.g., haul-out sites and rookeries)	–	–	–	–	Physical disturbance or loss; reduced habitat quality	–	–	–	Physical habitat loss; reduced quality
Offshore Habitats (e.g., calving grounds, foraging areas, or wintering grounds)	–	–	–	–	–	Temporary habitat disturbance during construction; possible long-term increase in habitat	Reduced habitat quality	–	Physical habitat loss; reduced quality
Migration	Displacement or impediment	Displacement or impediment	Displacement or impediment	Displacement or impediment	Displacement or impediment for terrestrial movements (e.g., polar bears)	Displacement or impediment	–	–	Displacement or impediment

[a] A dash indicates that no impact is anticipated.

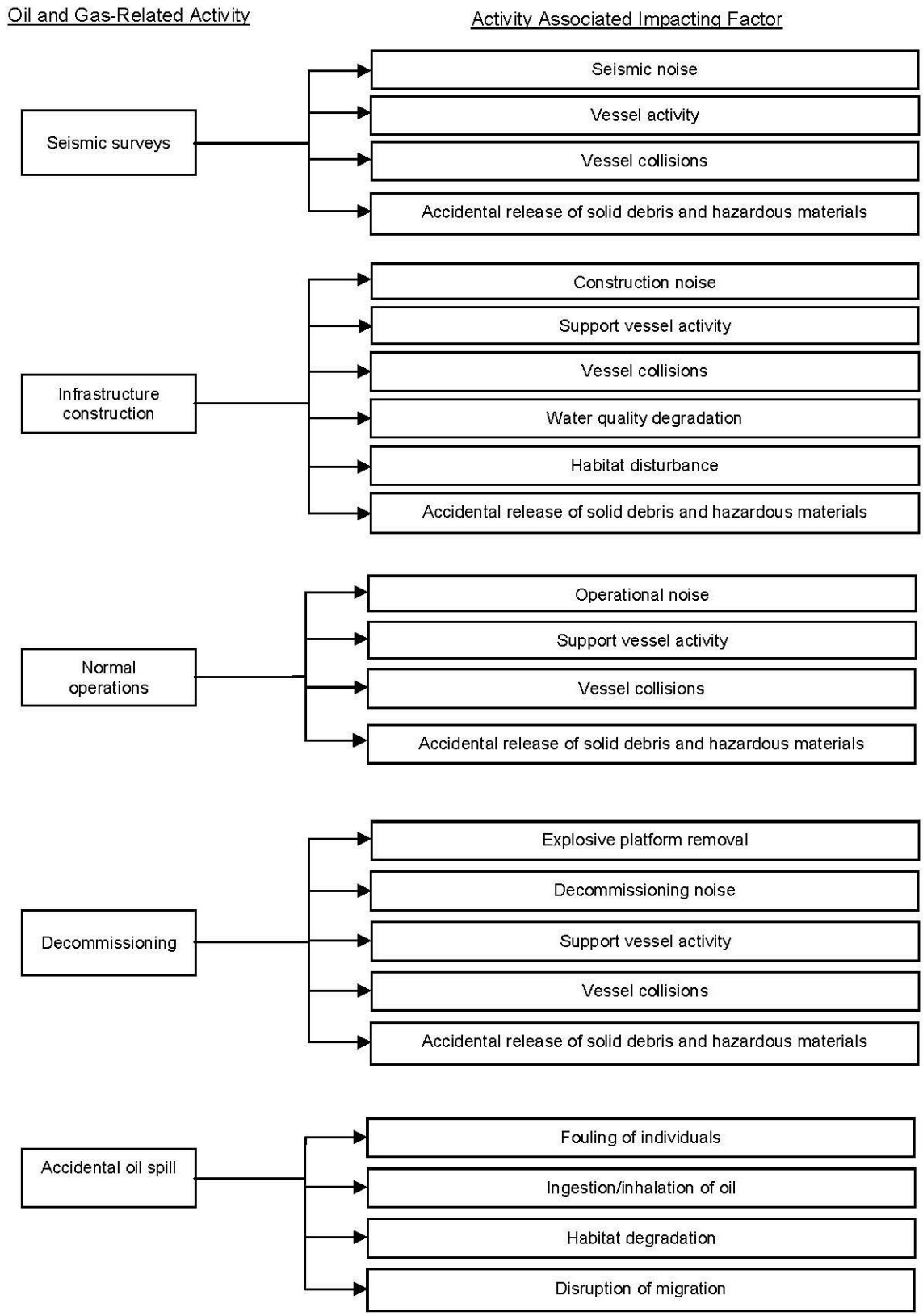

FIGURE 4.4.7-1 Conceptual Model for Anticipated Impacting Factors for Marine Mammals

Because of differences in the distribution and ecology of marine mammal species, routine operations under the proposed action would not equally affect marine mammal species. All of the mysticetes (baleen whales), except for the Bryde's whale, are considered extralimital or rare in the northern GOM (Würsig et al. 2000). Because of their rarity, it is unlikely that individuals of these species would be present where OCS-related activities would occur, and thus they would not be affected by routine operations of the proposed action. Although the Bryde's whale is the most frequently sighted mysticete whale, it is uncommon. While the Bryde's whale is present throughout the year, it occurs primarily in the Eastern Planning Area (Davis et al. 2000; Würsig et al. 2000; MMS 2004a). Waring et al. (2010) estimate a population size of 15 individuals. Thus, it would not be expected to be affected to any great extent by routine operations under the proposed action.

In contrast to the mysticetes, many of the odontocetes (toothed whales) are considered relatively common in the GOM OCS (Davis et al. 2000; MMS 2004a). Thus, there is a greater potential that some individuals of these species to occur in areas where OCS-related activities occur and to be affected during routine operations. The only odontocete listed as endangered is the sperm whale, which is the most common large whale in the GOM. Sperm whales occur year-round in all deepwater areas of the U.S. GOM, with a well-documented aggregation consistently found in the shelf-edge waters around the 305-m (1,000-ft) depth contour south of the Mississippi River Delta (Davis et al. 2000; MMS 2004a). Thus, this species may encounter OCS-related activities occurring within the northern GOM, especially in deepwater areas of the Central Planning Area.

Although manatees appear to prefer nearshore habitats, there are rare observations around structures at offshore sites. Negligible impacts on the West Indian manatee are anticipated because the 2012-2017 proposed action does not include routine operations in most of the Eastern Planning Area. The potential for impacts on manatees would occur in nearshore habitats where interactions with OCS-related activities (i.e., vessel traffic) exist. Service vessel impacts would mainly occur in the Central and Western Planning Areas where manatees occasionally occur.

The following analysis presents an overview of impacts on marine mammals from the following routine operations: (1) seismic surveys, (2) construction of offshore facilities and pipelines, (3) operations of offshore facilities and drilling rigs, (4) discharges and waste generation, (5) service vessel and helicopter traffic, and (6) decommissioning.

<u>Seismic Surveys.</u> Sections 4.4.1.1 and 4.4.5.1.1 provide descriptions of seismic survey technologies, energy outputs, operations, and general acoustic impacts. The type of O&G activities presently occurring in the GOM include:

- Seismic surveys (includes high-resolution site surveys and various types of seismic exploration and development surveys, including narrow azimuth, multi azimuth and wide azimuth);

- Side-scan sonar surveys;

- Electromagnetic surveys;
- Geological and geochemical sampling; and
- Remote sensing (including gravity, gravity gradiometry, and magnetic surveys).

Marine mammals produce and use sound to communicate as well as to orient, locate and capture prey, and to detect and avoid predators (Hofman 2004; Southall et al. 2007). A panel of experts in acoustic research from behavioral, physiological, and physical disciplines generated a report, *Marine Mammal Noise Exposure Criteria: Initial Scientific Recommendations* (Southall et al. 2007), which summarized existing acoustic and marine mammal data and made recommendations for regulatory criteria and research. Noise generated by seismic surveys may have physical and/or behavioral effects on marine mammals, such as (1) permanent or temporary hearing loss, discomfort, and injury; (2) masking of important sound signals; and (3) behavioral responses such as fright, avoidance, and changes in physical or vocal behavior (Richardson et al. 1995; Davis et al. 1998b; Gordon et al. 1998; Nowacek et al. 2004, 2007). Seismic surveys may also indirectly impact marine mammals by altering prey availability (Gordon et al. 2003, 2004).

Southall et al. (2007) synthesized the understanding of underwater and aerial hearing in some marine mammal groups and recommended some acoustic criteria. A precautionary approach was used to derive frequency-specific marine mammal weighting functions; the marine mammal hearing groups are broken down into five categories: (1) low-frequency cetaceans, which are the mysticetes, have an estimated lower and upper frequency range of 7 to 22 kHz; (2) mid-frequency species are estimated to have lower and upper frequency limits of hearing at approximately 150 Hz and 160 kHz, respectively; (3) high-frequency cetaceans have an estimated functional hearing between approximately 200 and 180 kHz; (4) pinnipeds in air have an estimated functional hearing between 75 and 30 kHz; and (5) pinnipeds in water have an estimated functional hearing between 75 and 75 kHz.

Almost all impacts of seismic surveys have been inferred or assumed by implication rather than observed. There have been no documented instances of deaths, physical injuries, or auditory (physiological) effects on marine mammals from seismic surveys. Behavioral responses have been observed but the biological importance of such behavioral responses (to the individual animals and populations involved) has not been determined.

The types of potential effects can be broken down into non-auditory injury, auditory effects, behavioral effects, and masking. Nowacek et al. (2007), Richardson et al. (1995), and Southall et al. (2007) have reviewed the effects of anthropogenic sound on marine mammals and are incorporated by reference.

Permanent loss of hearing in a marine mammal (i.e., permanent threshold shift [PTS]) is defined as the deterioration of hearing due to prolonged or repeated exposure to sounds that accelerate the normal process of gradual hearing loss (Kryter 1985), or the permanent hearing damage due to brief exposure to extremely high sound levels (Richardson et al. 1995). PTS

results in a permanent elevation in hearing threshold — an unrecoverable reduction in hearing sensitivity (Southall et al. 2007) and this is considered level A harassment under the MMPA. Noise may cause a temporary threshold shift (TTS), a temporary and reversible loss of hearing that may last for minutes to hours. Animals suffering from TTS over longer time periods, such as hours or days, may be considered to have a change in a biologically significant behavior, because they could be prevented from detecting sounds that are biologically relevant, including communication sounds, sounds of prey, or sounds of predators. TTS is considered level B harassment under the MMPA. To date, for level B harassment, NMFS uses the 160-decibel (dB) root-mean squared (rms) isopleth to indicate where level B harassment begins for acoustic impulse sounds, such as seismic surveying. Also, NMFS' policy has been to use the 180-dB rms isopleth where on-set level A harassment from acoustic sources potentially begins for cetaceans (whales, dolphins and porpoises) and 190-dB rms isopleth for pinnipeds (seals, sea lions).

For the purpose of analysis, it is assumed that operators will implement survey and monitoring mitigation (e.g., ramp-up, marine mammal observers, speed restrictions, exclusion zones) currently required in the GOM to minimize or avoid impacts of seismic on marine mammals with an emphasis on prevention of injury (auditory and non-auditory). Assuming the implementation of these mitigations, the potential for injury is minimized. There remains a greater potential for behavioral effects; therefore, the following discussion focuses on the potential behavioral changes resulting from exposure to seismic operations. More detailed discussions of impacts to marine mammals from seismic surveys in the GOM can be found in MMS (2004).

Non-Auditory Injury. Non-auditory injury could include direct acoustic impact on tissue, indirect acoustic impact on tissue surrounding a structure, acoustically mediated bubble growth within tissues from supersaturated dissolved nitrogen gas, or resonance. However, resonances are not anticipated given that the resonance frequencies of marine mammal lungs are generally below that of the G&G seismic survey source signal (Nowacek et al. 2007; Zimmer and Tyack 2007).

Auditory Effects (PTS and TTS). The hearing of marine mammals varies based on individuals, thresholds of the species, location in relation to the sound source, frequency discrimination, and the motivation of an individual to change behaviors due to the sound (Richardson et al. 1995). PTS results in a permanent elevation in hearing threshold — an unrecoverable reduction in hearing sensitivity (Southall et al. 2007). TTS is defined as a temporary and reversible loss of hearing that may last for minutes to hours. The duration of TTS depends on a variety of factors including intensity and duration of the stimulus. Therefore, animals suffering from TTS over longer time periods, may be considered to have a change in a biologically significant behavior, as they could be prevented from detecting sounds that are biologically relevant, including communication sounds, sounds of prey, or sounds of predators.

Behavioral Effects. A number of studies have documented behavioral effects in response to seismic surveys, primarily for marine mammals (Richardson et al. 1995, Southall et al. 2007). The Bryde's whale is the only mysticete species occurring regularly in the GOM. As discussed in Southall et al. (2007), the expected frequencies of best hearing sensitivity in mysticetes and maximal air gun output at source may overlap. Given that no direct audiograms of mysticetes

have been obtained, it is impossible to define what level of sound above hearing threshold may cause behavioral effects, which would be expected to be variable, complicated, and dependent upon more than just the received sound level. For this reason, observations at sea have concentrated on relating received sound levels to observed behavioral changes (Malme et al. 1983, 1984, 1985, 1986, 1988; Reeves et al. 1984; Richardson et al. 1986; Ljungblad et al. 1988; McDonald et al. 1993; Richardson and Malme 1993; Richardson 1998; McCauley et al. 2000a, b).

Auditory thresholds of adult sperm whales have not been obtained. Ridgeway and Carder (2001) studied the vocalizations of a neonate sperm whale which led them to believe that they are sensitive to a wide range of frequencies. This was also hypothesized by Bowles et al. (1994). Sperm whales are a highly vocal species under natural conditions (i.e., they click almost continuously during dives). Jochens et al. 2008 synthesized the findings of the Sperm Whale Seismic Study (SWSS) in the GOM. They stated that it does not appear that sperm whales in the SWSS study area showed any horizontal avoidance to controlled exposure of seismic air gun sounds. The data analysis suggested that, for at least some individuals, it is more likely that some decrease in foraging effort may occur during exposure to full-array air gun firing as compared to the post-exposure condition. Sperm whales are most likely acoustically aware of their environment and can exhibit behavioral reactions in a number of ways, including interruption of vocal activity and foraging. However, there are insufficient data to assign thresholds for acoustic disturbance to sperm whales. Sperm whales are also deep divers, spending relatively little time at the surface while feeding. Therefore, they may be less likely to receive any surface shielding afforded by refractive effects caused by near surface hydrographic conditions, which can sometimes occur. As air gun arrays are generally configured to produce a maximum, low frequency energy lobe directly downwards toward the seabed, sperm whales may enter a region of increased ensonification.

Dwarf and pygmy sperm whales are also deep-diving and use echolocation clicks in the sonic and low ultrasonic frequency range (Willis and Baird 1998). Few audiograms have been obtained for pygmy sperm whales, dwarf sperm whales, or beaked whales (Cook et al. 2006; Finneran et al. 2009; Ridgway and Carder 2001), so there still are insufficient data to determine avoidance thresholds. Like sperm whales, they may be sensitive to a wide range of sound frequencies, including those produced by air gun arrays. Similarly, beaked whales are also deep divers, use echolocation clicks to find their prey, and have been shown to be susceptible to acoustic disturbance (Frantzis 1998; Balcomb and Claridge 2001). Since they have similar deep-diving habits and relatively widespread distributions in the GOM, this may warrant concern for dwarf and pygmy sperm whales and beaked whales.

Delphinids include dolphins, killer whales, and pilot whales. Several studies have been conducted documenting the effects of seismic operations on delphinid species. Finneran et al. (2000a) discuss a behavioral response study measuring masked underwater hearing thresholds in bottlenose dolphin and beluga whale, before and after exposure to seismic pulses from a watergun. Ridgway et al. (1997) showed that captive delphinids produced behavioral reactions at levels at least 10 dB below those that induced TTS. Soto et al. (2006) and Van Parijs and Corkeron (2001) showed vessel presence is sufficient to change behavior in some species and situations.

Dolphin species are generally mid- to high-frequency hearing specialists (Southall et al. 2007). While air guns are primarily low frequency (<200 Hz), they are considered broadband and therefore there is energy at higher frequencies. These energies encompass the entire audio frequency range of 20 Hz to 20 kHz (Goold and Fish 1998), and extend well into the ultrasonic range up to 50 kHz (Sodal 1999). This high-frequency energy must be taken into account when considering seismic interactions with Delphinids. The high-frequency components of air gun emissions are of sufficient level to exceed the dolphin auditory threshold curve at these low frequencies, even after spreading loss (Goold and Fish 1998).

Some studies, such as Wakefield (2001), have shown that vocal behaviors of common dolphins may be altered by air guns. Stone (1996, 1997a, b, 1998) reported that common dolphins, white beaked dolphins, and white sided dolphins were sighted in the vicinity of seismic surveys less often when the guns were firing than when they were not firing. However, some marine mammals are known to continue calling in the presence of seismic pulses. Their calls can be heard between the seismic pulses (e.g., Richardson et al. 1986; McDonald et al. 1995; Greene et al. 1999; Nieukirk et al. 2004; Smultea et al. 2004). Although Delphinids specialize in hearing ranges generally outside of the majority of seismic survey impulse sounds, there is still the potential for sounds from these surveys to fall within the acoustic sensitivity of toothed whales and for behavioral responses to seismic noise to occur.

Masking. Auditory masking occurs when a sound signal that is of importance to a marine mammal (e.g., communication calls, echolocation, environmental sound cues) is rendered undetectable due to the high noise-to-signal ratio in a frequency band relevant to a marine mammal's hearing range. In other words, noise can cause the masking of sounds that marine mammals need to hear to in order to function effectively (Erbe et al. 1999). If sounds used by the marine mammals are masked to the point where they cannot provide the individual with needed information, critical natural behaviors could be disrupted and harm could result (Erbe and Farmer 1998).

In the case of seismic surveys, where potential masking noise takes a pulsed form with a low duty cycle (~10%, or 1 s of active sound for every 10 s of ambient noise) (MMS 2004), the effect of masking is likely to be low relative to continuous sounds such as ship noise. Some marine mammals are known to continue calling in the presence of seismic pulses. Their calls can be heard between the seismic pulses (e.g., Richardson et al. 1986; McDonald et al. 1995; Greene et al. 1999; Nieukirk et al. 2004; Smultea et al. 2004). Bowles et al. (1994) reported that sperm whales ceased calling when exposed to pulses from a very distant seismic ship, while other studies reported that sperm whales continued calling in the presence of seismic pulses (Madsen et al. 2002; Tyack et al. 2003; Smultea et al. 2004; Holst et al. 2006; Jochens et al. 2006).

Some marine mammals are known to increase the source levels of their calls in the presence of elevated sound levels, or to shift their peak frequencies in response to strong sound signals (Dahlheim 1987; Au 1993; review in Richardson et al. 1995;Lesage et al. 1999; Terhune 1999; Nieukirk et al. 2005; Parks et al. 2007). However, these studies tested other anthropogenic sounds, not seismic pulses, and it is not known if air guns would elicit this same response. If so, these adaptations would all reduce the importance of masking.

Construction of Offshore Facilities and Pipelines. Figure 4.4.7-2 presents a conceptual model for potential effects of infrastructure construction on marine mammals. Construction and trenching activities may affect habitat use for the short or long-term. Marine mammals are mobile and able to avoid areas where construction or trenching is occurring so they are less likely to be injured or killed but their behavior may be altered. Noise and human activity associated with the construction of offshore facilities and pipelines (e.g., pile driving, vessel presence) could disturb marine mammals that may be present in the vicinity of the construction activity. Construction activities could disturb normal behaviors (e.g., feeding, social interactions), mask calls from conspecifics, disrupt echolocation capabilities, temporarily affect localized air/water quality and mask sounds generated by predators. Depending on the size of the project, at any single location, offshore construction and trenching activities would be of relatively short duration since the majority of construction activities would occur on land. The length of time necessary for offshore construction depends on what is being constructed, the water depth, procurement activities, the climatic conditions to install the platform could be considered. It also depends on if the construction project is a fixed platform, semi-submersible platform, or jack-up drilling platform and each one could take approximately 1 to 2 months to set up, depending on the contractor. In addition, running a pipeline likely would not take more than 2–3 weeks.

Animals may leave the vicinity of a constructions area. Some known locations for the endangered sperm whale includes, but is not limited to, the continental slope waters off the Mississippi River Delta in the Central Planning Area (Jochens 2007; Davis et al. 2000; MMS 2004a). Portions of the GOM that would be disturbed by the construction of new wells and pipelines would be largely limited to the immediate footprint of the new structure and its surroundings. Animals would be expected to locate to other suitable habitat nearby. Some permanent displacement may occur, but would be largely limited to the local environment surrounding individual wells or areas with well aggregations, and thus would not be expected to affect overall habitat availability or cetacean access.

Currently in the northern GOM, the West Indian manatee is the only marine mammal that has a federally designated critical habitat, and this habitat is limited to specific coastal and inland marine and freshwater areas in peninsular Florida (west, southeast, and northeast Florida). As pipeline landfalls and land-based facilities associated with the proposed action would not be located in Florida, no impacts to West Indian manatee critical habitat would occur.

Under the proposed action, only a few individuals or small groups of marine mammals would be temporarily disturbed behaviorally by routine construction of offshore facilities, and disturbance of these individuals, given their localized nature, would not be expected to result in population-level effects. Any impacts on marine mammals incurred from structure placement or trenching would be short term and localized to the construction area and immediate surroundings, and therefore unlikely to cause more than minor impacts to marine mammals. Onshore construction and operation activities are unlikely to impact cetacean and sirenian populations. Overall, the impacts associated with construction of offshore facilities and pipelines are unlikely to have significant adverse effects on the size and recovery of any marine mammals species or population in the GOM. It is assumed that BOEM will continue to implement GOM

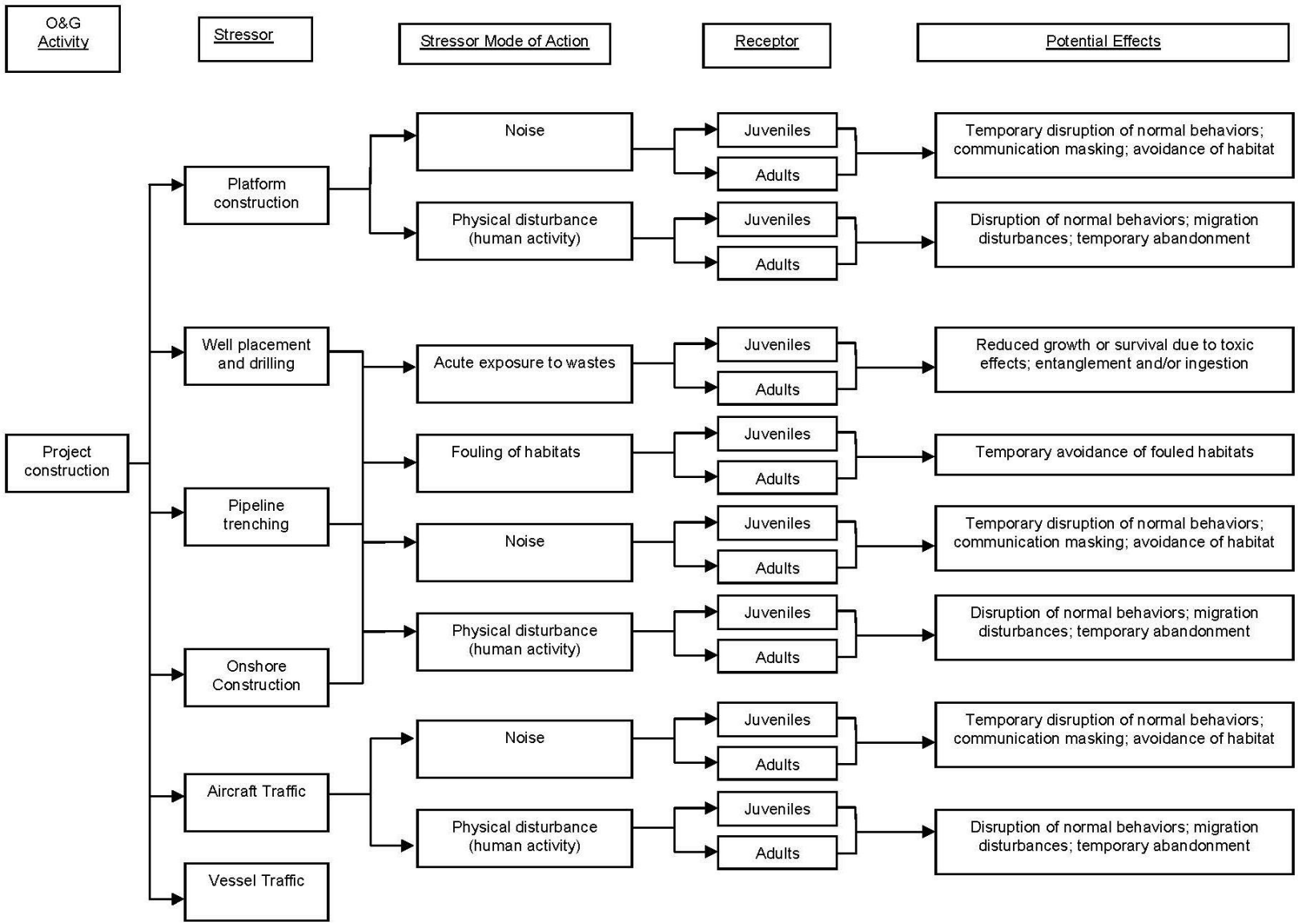

FIGURE 4.4.7-2 Conceptual Model for Potential Effects of Infrastructure Construction on Marine Mammals

guidelines currently in place to reduce impacts to marine mammals such as vessel strike avoidance measures and marine debris awareness.

Operations of Offshore Facilities and Drilling Rigs. Noise from drilling could be intermittent, sudden, and at times could be high intensity as operations take place. Sound from a fixed, ongoing source like an operating drillship is continuous. However, the distinction between transient and continuous sounds is not absolute on a drillship, as generators and pumps operate essentially continuously; however, there are occasional transient bangs and clangs from various impacts during operations (Richardson et al. 1995). Estimated frequencies from drilling by semisubmersible vessels are broadband from 80 to 4,000 Hz, with an estimated source level of 154 dB re 1 μPa at 1 m. Tones of 60 Hz had source levels of 149 dB, 181 Hz was 137 dB, and 301 Hz was 136 dB (Greene 1986). The potential effects that water-transmitted noise have on marine mammals include disturbance (subtle changes in behavior, interruption of previous activities, or short- or long-term displacement), masking of sounds (calls from conspecifics, reverberations from own calls, and other natural sounds such as surf or predators), physiological stress, and hearing impairment. Individual marine mammals exposed to recurring disturbance could be negatively affected. Malme et al. (1986) observed the behavior of feeding gray whales in the Bering Sea during four experimental playbacks of drilling sounds (50–315 Hz; 21-minute overall duration and 10% duty cycle; source levels of 156–162 dB re: 1 μPa-m). In two cases for received levels 100–110 dB re: 1 μPa, there was no observed behavioral reaction. Avoidance behavior was observed in two cases where received levels were 110–120 dB re: 1 μPa. These source levels are all below NMFS's current 160-dB level B harassment threshold under the MMPA.

The source levels from drilling are relatively low (154 dB and below, as cited by Greene [1986] in Richardson et al. [1995]), below the level B (behavioral) harassment threshold of 160 dB (set by NMFS). According to Southall et al. (2007), for behavioral responses to nonpulses (such as drill noise), data indicate considerable variability in received levels associated with behavioral responses. Contextual variables (such as novelty of the sound to the marine mammal and operation features of the sound source) appear to have been at least as important as exposure level in predicting response type and magnitude. While there is some data from the Arctic on baleen whales, there is little data on the behavioral responses of marine mammals in the GOM from the sound of drilling. Southall et al. (2007) summarized the existing research, stating that the probability of avoidance and other behavioral effects increases when received levels increase from 120 to 160 dB. Marine mammals may exhibit some avoidance behaviors, but their behavioral or physiological responses to noise associated with the proposed action, however, are unlikely to have population-level impacts to marine mammals in the northern GOM.

Discharges and Waste Generation. Table 4.4.1-1 presents information on drilling fluids, drill cuttings, and produced waters discharged offshore as a result of the proposed action. Produced water, drilling muds, and drill cuttings are discharged into offshore marine waters in compliance with applicable regulations and permits. Compliance with regulations and permits will limit the exposure of marine mammals to waste discharges. The discharge or disposal of solid debris into offshore waters from OCS structures and vessels is prohibited by the BOEM

(30 CFR 250.40) and the USCG (International Convention for the Prevention of Pollution from Ships [MARPOL], Annex V, P.L. 100-220 [101 Statute 1458]).

Most operational discharges are diluted and dispersed when released in offshore areas and are considered to have sublethal effects (NRC 1983; API 1989; Kennicutt 1995; Kennicutt et al. 1996). Any potential impacts from drilling fluids would be indirect, either as a result of impacts to prey species or possibly through ingestion via the food chain (Neff et al. 1989). However, marine mammals are generally not considered good bioaccumulators of petroleum compounds from eating contaminated prey due to rapid metabolism and excretion rates (Neff 1990). As such, impacts from discharges related to the proposed action would not be expected to result in long term impacts to marine mammals because these compounds would not assimilated.

Many types of plastic materials end up as solid waste during drilling and production operations. Some of this material is accidentally lost overboard where cetaceans could consume it or become entangled in it. The incidental ingestion of marine debris and entanglement could adversely affect marine mammals. Industry has made good progress in debris management on vessels and offshore structures in the last several years. It is assumed that BOEM will continue to require implementation of current trash and debris elimination guidelines that appreciably reduce the likelihood of marine mammals encountering marine debris from the proposed action. Thus, impacts to marine mammals from entanglement in or ingestion of OCS-related trash and debris under the proposed action would be negligible to minor.

<u>Service Vessel and Helicopter Traffic.</u> There may be 300 to 600 vessel and 2,000 to 5,500 helicopter trips per week under the proposed action (Table 4.4.1-1). Figure 4.4.7-3 presents a conceptual model for the potential effect of vessel traffic on marine mammals. Vessel traffic could occur during seismic exploration, drilling and platform construction, platform operation, and platform decommissioning.

Ship strikes are a concern for marine mammals. There have been documented reports of cetaceans being struck by ships in the oceans throughout the world (Laist et al. 2001; Jensen and Silber 2004; Glass et al. 2008), although none to date in the GOM as a result of offshore oil/gas operations. Analyses by Vanderlaan and Taggart (2007) provides evidence that as vessel speeds fall below 15 knots (27.75 km/hr or 17.25 mph), there is a substantial decrease in the probability of a vessel strike to prove lethal to a large whale. Collisions with vessels greater than 80 m (260 ft) in length are usually either lethal or result in severe injuries (Laist et al. 2001). In addition, a majority of ship strikes seemed to occur over or near the continental shelf. Collisions with vessels can cause major wounds on marine mammals and/or be fatal. Debilitating injuries may have negative effects on a population through impairment of reproductive output (MMS 2003e). Cetaceans are more likely to be struck by vessels if they are young or sick, slow swimmers, distracted by feeding or mating activities, habituated to vessels, or congregated in an area for feeding or breeding (Dolman et al. 2006). Vessel strikes in inland waterways are a major cause of death in the manatee population. Because this species is rare in these planning areas, encounters with OCS-related vessels in these areas would be unlikely.

Deep-diving whales, such as the sperm whale, may be more vulnerable to vessel strikes given the longer surface period required to recover from extended deep dives. NMFS has determined that vessel strikes are a "discountable" concern for sperm whales when vessel avoidance measures are implemented (USDOC, NMFS 2007b); it is assumed for the purpose of this analysis that BOEM will continue to requirement operator implementation of such avoidance criteria and speed limitations.

It is possible that noise produced from vessels and, to a lesser extent helicopters, can cause disturbance, masking of sounds, and physiological stress. The dominant source of noise from vessels is from the propeller operation, and the intensity of this noise is largely related to ship size and speed. Vessel noise from activities resulting from the proposed action will produce low levels of noise, generally in the 150- to 170-dB re 1 µPa-m at frequencies below 1,000 Hz. Vessel noise is transitory and generally does not propagate at great distances from the vessel.

The noise and the shadow from helicopter overflights, take-offs, and landings can cause a startle response and can interrupt whales and dolphins while resting, feeding, breeding, or migrating (Richardson et al. 1995). The Federal Aviation Administration's Advisory Circular 91-36D (September 17, 2004) encourages pilots to maintain higher than minimum altitudes over noise-sensitive areas. Guidelines and regulations put in place by NOAA Fisheries under the authority of the Marine Mammal Protection Act include provisions specifying that helicopter pilots maintain an altitude of 305 m (1,000 ft) within 91 m (300 ft) of marine mammals. Helicopter occurrences would be temporary and pass within seconds. Marine mammals are not expected to be adversely affected by routine helicopter traffic operating at prescribed altitudes.

<u>Decommissioning</u>**.** Under the proposed action, 150 to 275 platforms may be removed with explosives from the northern GOM. Figure 4.4.7-4 presents a conceptual model for potential impacts of decommissioning on marine mammals.

BOEM published a programmatic EA on decommissioning operations (MMS 2005) that, in part, addresses the potential impacts of explosive- and nonexplosive-severance activities on OCS resources, particularly upon marine mammals and sea turtles. Pursuant to 30 CFR 250 Subpart Q, operators must obtain a permit from BOEM before beginning any platform removal or well-severance activities. The NMFS has issued regulations (50 CFR Part 216) under the MMPA for "Taking Marine Mammals Incidental to the Explosive Removal of Offshore Structures in the Gulf of Mexico," and operators are required to obtain a Letter of Authorization from NMFS in accordance with these regulatory conditions. This analysis assumes the continued implementation of current BOEM guidelines on decommissioning which specify limits on the type and size of explosives that can be used and the times when detonations can occur; require explosives to be placed at a minimum depth of 15 m (49 ft) below the sediment surface; and require a monitoring plan that uses qualified observers to monitor the detonation area for protected species, including all marine mammals, prior to and after each detonation. The detection of a marine mammal (or other applicable biota) within the blast zone would, without exception, would delay explosive detonation. Thus, explosive platform removals conducted under the proposed action and complying with BOEM guidelines would not be expected to adversely affect marine mammals in the GOM.

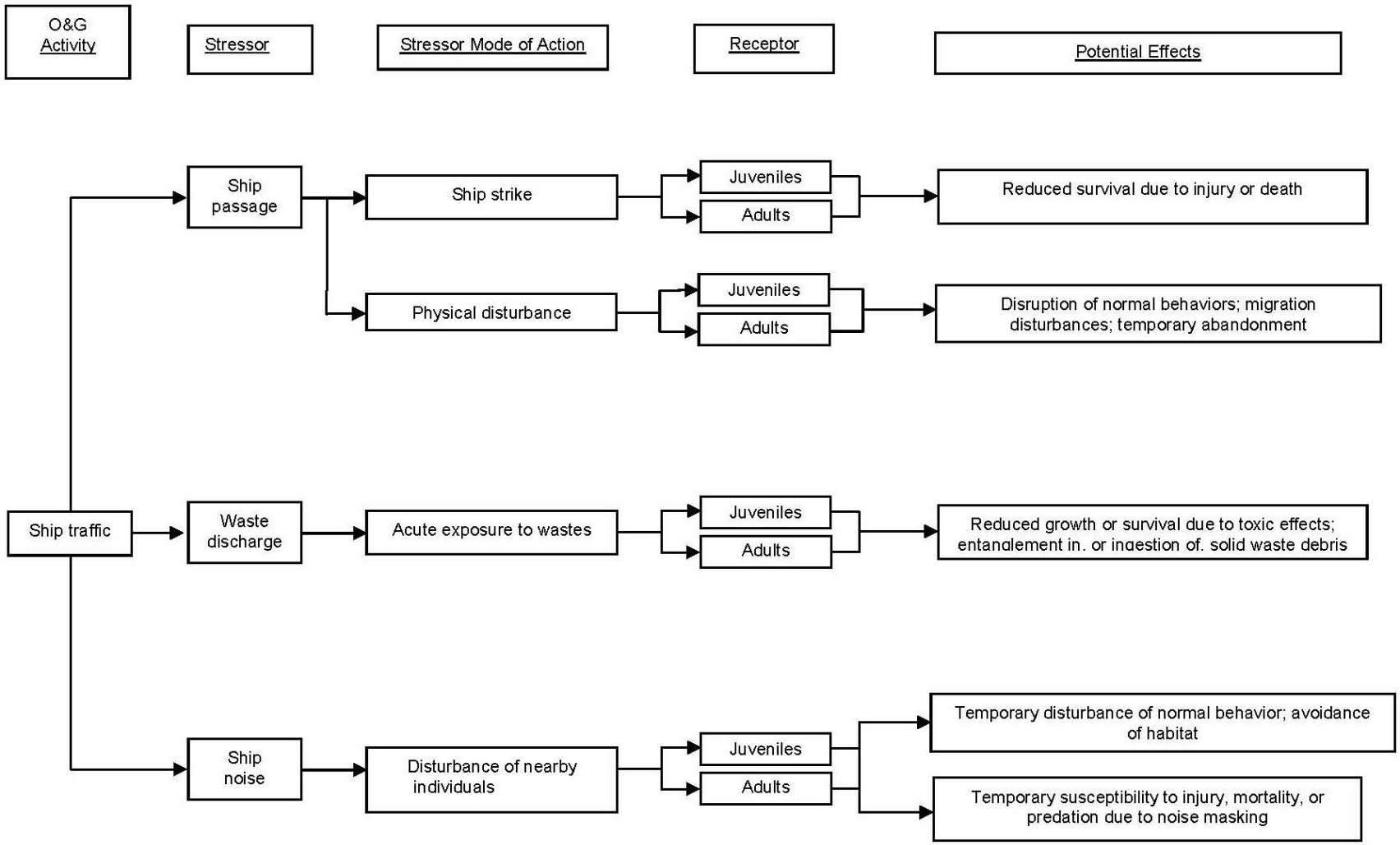

FIGURE 4.4.7-3 Conceptual Model for Potential Effects of Vessel Traffic on Marine Mammals

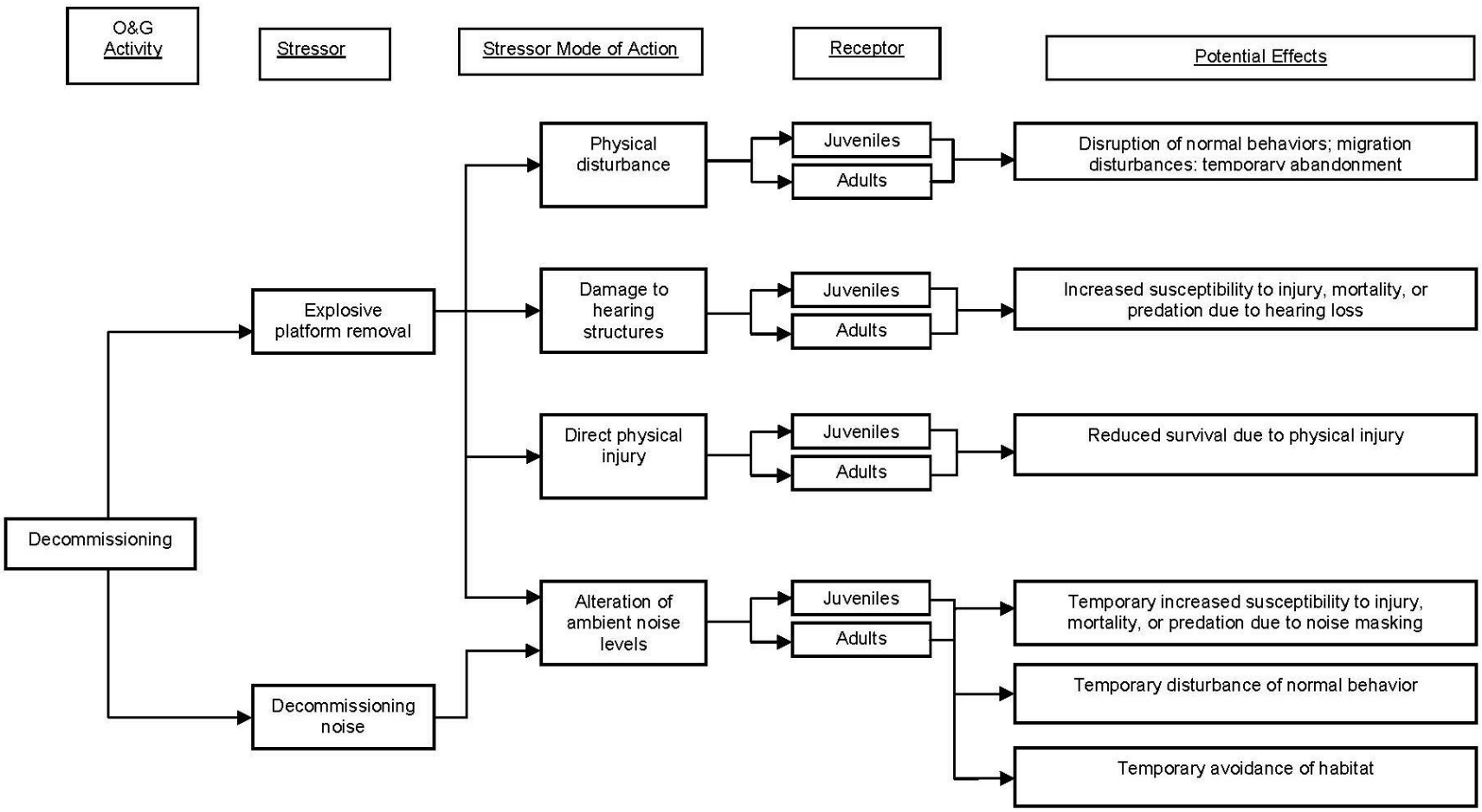

FIGURE 4.4.7-4 Conceptual Model for Potential Effects of Decommissioning on Marine Mammals

Accidents. Potential effects on marine mammal species may occur from accidental activities associated with the proposed action and may be direct or indirect. Accidental oil spills could occur in the GOM under the proposed action (Section 4.4.2.1). Tables 4.4.2-1 and 4.4.2-2 presents the oil spill assumptions for the purpose of analyzing the proposed action, while Figure 4.4.7-5 presents a conceptual model for potential effects of oil spills on marine mammals.

The major potential impact-producing factors include accidental blowouts, platform and pipeline oil spills, and spill-response activities. Impacts (i.e., acute vs. chronic impacts) depend on the magnitude, frequency, location, and date of accidents; characteristics of spilled oil; spill-response capabilities and timing; and various meteorological and hydrological factors. Impacts could include decreased health, reproductive fitness, and longevity; and increased vulnerability to disease). Spilled oil can cause soft tissue irritation, fouling of baleen plates, respiratory stress from inhalation of toxic fumes, food reduction or contamination, direct ingestion of oil and/or tar, and temporary displacement from preferred habitats (St. Aubin and Lounsbury 1990; Geraci and St. Aubin 1990). The long-term impacts to marine mammal populations are poorly understood but could include decreased survival and lowered reproductive success. Impacts from dispersants are unknown but may be irritants to tissues and sensitive membranes (NRC 2005). Chronic or acute exposure may result in harassment, harm, or mortality to marine mammals. In some cases, marine mammals made no apparent attempt to avoid spilled oil in some cases (Smultea and Würsig 1995); however, marine mammals have been observed apparently detecting and avoiding slicks in other reports (Geraci and St. Aubin 1990).

Impacts on marine mammals from smaller accidental events may adversely affect individual marine mammals in the spill area, but are unlikely to rise to the level of population effects (or significance) given the size and scope of such spills. Assuming that all small spills would not occur at the same time and place, water quality would rapidly recover and therefore would not have significant effects on marine mammals or their prey species. The potential effects associated with a large spill may be more adverse than a smaller accidental spill and could potentially contribute to longer-lasting effects. The long-term impacts to marine mammal populations could include decreased survival and lowered reproductive success. For example, the oil from an oil spill can adversely affect cetaceans by causing soft tissue irritation, fouling of baleen plates, respiratory stress from inhalation of toxic fumes, food reduction or contamination, direct ingestion of oil and/or tar, and temporary displacement from preferred habitats. However, the range of toxicity and degree of sensitivity to oil hydrocarbons and the effects of cleanup activities on cetaceans are not fully understood. Similarly, impacts to marine mammals from dispersants are not fully understood, but may be irritants to tissues and sensitive membranes (NRC 2005). One assumption concerning the use of dispersants is that the chemical dispersion of oil will considerably reduce the impacts to marine mammals, primarily by reducing their exposure to petroleum hydrocarbons (French-McCay 2004; NRC 2005). However, the impacts to marine mammals from chemical dispersants could include nonlethal injury (e.g., tissue irritation, inhalation), long-term exposure through bioaccumulation, and potential shifts in distribution from some habitats.

Catastrophic Discharge Event. The PEIS analyzes a CDE up to 7.2 million bbl (Table 4.4.2-2). If a CDE occurs, there is greater potential for more severe effects compared to the risk of effects from a large oil spill. A CDE would result in sustained degradation of water

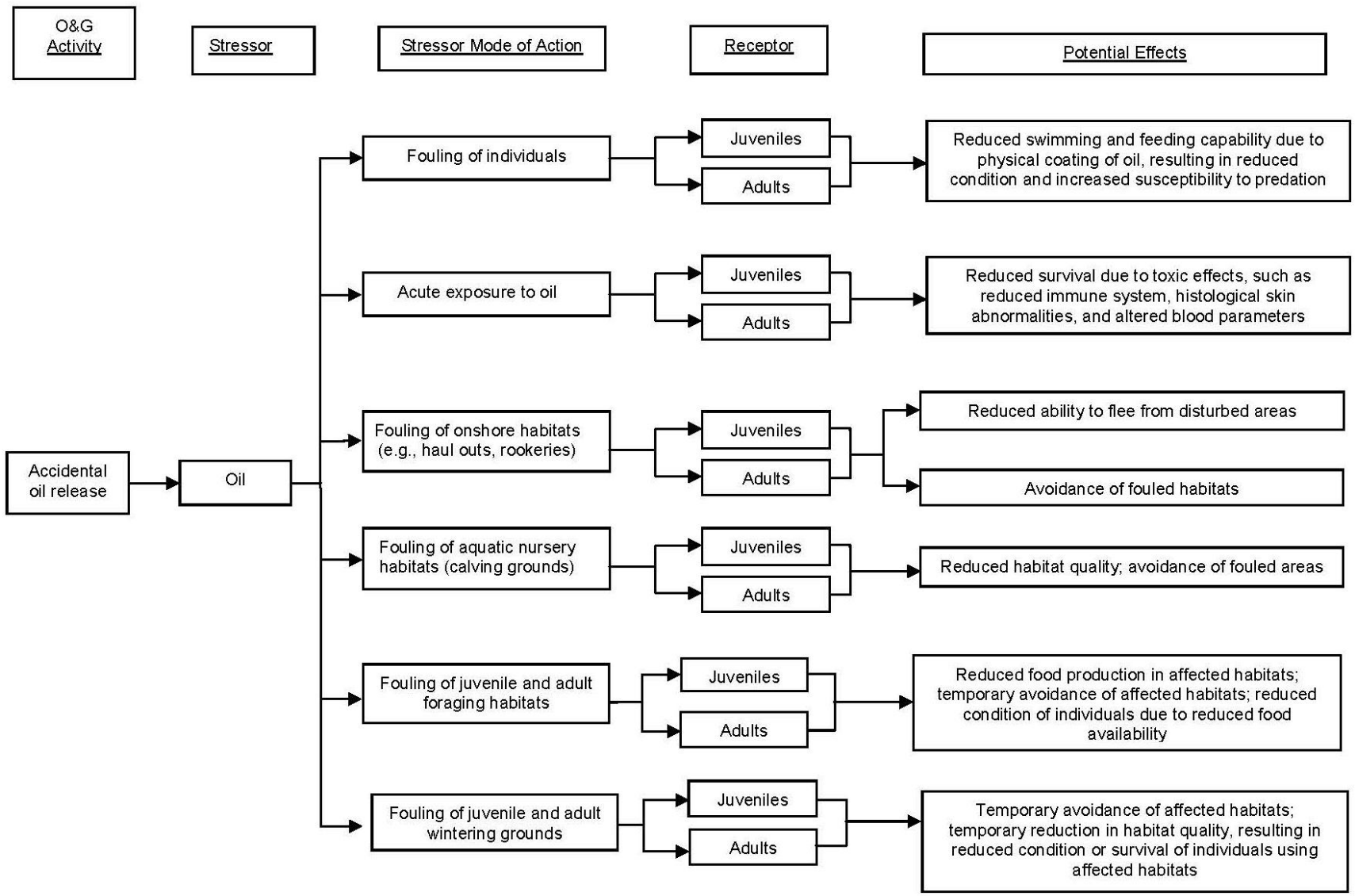

FIGURE 4.4.7-5 Conceptual Model for Potential Effects of Oil Spills on Marine Mammals

quality and, to a lesser extent, air quality that would impact marine mammals from direct contact, inhalation, and ingestion (either directly or indirectly through the consumption of oiled forage or prey species). These effects would be significant, causing a multitude of acute and chronic effects. Additional effects on marine mammals would occur from water and air quality degradation associated with response and cleanup vessels, *in situ* burning of oil, dispersant use, discharges and seafloor disturbances from relief well drilling, and activities on shorelines associated with cleanup, booming, beach cleaning, and monitoring. A CDE has the potential to increase the area and duration of an oil spill, thereby increasing the potential for population-level effects, or at a minimum, an increase in the number of individuals killed. For example, following the DWH event, dead marine mammals collected from April 30, 2010, through April 12, 2011, included 142 bottlenose dolphins, 3 spinner dolphins, and 2 each of *Kogia* spp., melon-headed whales, and sperm whales (NMFS 2011b).

Terrestrial Mammals. The terrestrial mammals considered in this section are those species listed as endangered under the ESA that may be affected by routine OCS operations or accidents under the proposed action. These include the Alabama, Choctawhatchee, Perdido Key, and St. Andrew beach mice (subspecies of the old-field mouse) and the Florida salt marsh vole (Section 3.8.1.1.2).

***Routine Operations*.** The endangered beach mice subspecies inhabit mature coastal barrier sand dunes on the Alabama and northwest Florida coasts; the Florida salt marsh vole inhabits salt marsh habitats and is known from two locations (Waccasassa Bay in Levy County, Florida, and the Lower Suwannee National Wildlife Refuge), in southeastern Dixie and northwestern Levy Counties, Florida; Figure 3.8.1-1). Under the proposed action, no new OCS-related facilities or activities would occur in close proximity to the known habitats for these species; therefore, routine operations would not affect any of the species.

Accidents. Three types of oil residues on or near beach environments are particularly challenging or potentially damaging to the environment if removed (OSAT 2011):

- Supratidal buried oil — oil residue typically buried below the 15-cm (6-in.) surface cleaning depth near sensitive habitats, removal of which would damage these sensitive habitats and affect protected species;

- Small surface residual balls — oil residue left behind after beaches are cleaned (removal would involve sieving sand so finely that it could remove material used for habitat by organisms, thus altering the natural condition of the beach; and

- Surf zone submerged oil mats — submerged oil mats in nearshore surf zone in troughs between sand bars.

In the event of an accidental offshore or coastal oil spill, the four beach mice subspecies and the vole species could be affected by oil washing up on their beach habitats, and by subsequent spill containment and cleanup activities. Individuals coming in direct contact with spilled oil may experience skin, ear, eye, throat, and mucous membrane irritations. Oiling of fur

may affect thermoregulation. Individuals inhaling petroleum vapors may aggravate linings of the respiratory system and in extreme cases may result in asphyxiation. Oil may be ingested through contaminated food or during cleaning of oiled fur. Exposure to oil via inhalation or ingestion may lead to a variety of lethal and sublethal effects, including lung, liver, and kidney damage. Beach mice could be exposed to small surface residual balls via ingestion of residual oil in soil and by exposure in their burrows (OSAT 2011).

In addition to affecting individuals, an oil spill may also affect the habitats of these small mammals. Oil contacting their habitats could result in a reduced food supply (oiled vegetation), reduced physical habitat quality (oiled sands), and fouling of nests and burrows. The fouling of nests and burrows may also lead to a temporary displacement from or permanent abandonment of these habitats. Depending on the persistence of the oil in these habitats and the effectiveness of spill cleanup, long-term reductions in overall habitat quality and quantity may be possible.

An accidental spill fairly close to shore would have the potential to contact beaches adjacent to beach mouse habitat, particularly if a spill were to occur nearshore or within inshore waterways. However, beach mice are generally restricted to interior dune habitats, which would not be expected to come in contact with spilled oil unless the accident occurred during a period of high storm surge. In contrast, habitats of the Florida salt marsh vole may be more vulnerable to an oil spill because of their being connected to coastal waters. However, the location of this species and its habitat on the western Florida coast are far removed from those portions of the GOM OCS where exploration and development might occur under the proposed action.

If an oil spill occurs and contacts a coastal area associated with these species, oil spill response activities, including beach cleanup activities and vehicular and pedestrian traffic, could result in habitat degradation. However, cleanup activities would be designed and conducted in consultation with the USFWS and other appropriate stakeholders so that the potential for impacts on these species and their habitats would be minimized or avoided.

Large-scale oiling of beach mice or vole habitats could result in extinctions, and if not properly regulated, oil spill-response and cleanup activities could have a significant impact on the species and their habitats. Vehicle traffic and activity associated with oil spill cleanup can trample or bury nests and burrows or cause displacement from preferred habitat (MMS 2008b). If disturbance results in the temporary abandonment of young by adults, survival of young may be reduced (MMS 2007d).

The probabilities of large oil spills (≥1,000 bbl) resulting from the proposed action occurring and contacting beach mouse or Florida salt marsh vole habitat within 3 to 30 days from a spill in various locations in the WPA, CPA, and far western EPA is ≤5%. In most instances, the probabilities were 0% to 1% (MMS 2004a). Direct contact with spilled oil that has washed ashore can cause skin and eye irritation, asphyxiation from inhalation of fumes, oil ingestion, and reduction or contamination of food sources. A slick cannot wash over the fore dunes unless carried by a heavy storm swell. High seas would be necessary to cause a spill slick to landfall and affect beach mice, Florida salt marsh voles, or their habitats. However, erosion with high seas during storms is likely to do more damage to rodent habitat than oiling.

Protective measures required under the ESA should prevent any oil spill-response and cleanup activities from having more than minor impacts on beach mice, the Florida salt marsh vole, and their habitats (MMS 2003e).

Catastrophic Discharge Event. The PEIS analyzes a CDE up to 7.2 million bbl (Table 4.4.2-2). If a CDE occurs, there is greater potential for more severe effects compared to the risk of effects from a large oil spill. A CDE would potentially result in sustained degradation of water quality, shoreline terrestrial habitats, and, to a lesser extent, air quality that could impact terrestrial mammals from direct contact, inhalation, and ingestion (either directly or indirectly through the consumption of oiled forage or prey species). These effects could be significant, causing a multitude of acute and chronic effects. Additional effects on terrestrial mammals would occur from land and air quality degradation associated with response and cleanup vessels, *in situ* burning of oil, dispersant use, and activities on shorelines associated with cleanup, booming, beach cleaning, and monitoring. A CDE has the potential to alter terrestrial mammal habitats and populations, and, could foreseeably contribute to population-level effects on one or more of the beach mice subspecies and/or the Florida salt marsh vole. The potential for these impacts would be more probable if the catastrophic discharge event occurs coincident with a severe storm event (e.g., a hurricane).

4.4.7.1.2 Alaska – Cook Inlet.

Marine Mammals. There are 18 species of marine mammals that occur in south Alaskan waters and that may either occur in or near (such as the Gulf of Alaska, Kenai Peninsula, and Kodiak Archipelago) the Cook Inlet Planning Area (Section 3.8.1.2.1; Table 3.8.1-2). Nine of these species or species stocks are threatened or endangered under the ESA. These species include the North Pacific right, sei, blue, fin, humpback, sperm, and beluga whales; the Steller sea lion; and the sea otter. The non-listed species commonly occur in portions in or near the Cook Inlet Planning Area (MMS 2003e). Marine mammals may be exposed to OCS-related oil and gas exploration, development, and operations that could occur under the proposed action.

Routine Operations. As part of the proposed action, a maximum of 4 to 12 exploration and delineation wells and 42 to 114 development and production wells will be drilled and 1 to 3 new platforms are projected to be used. Additional activities planned as part of the proposed action include 40 to 241 km (25 to 150 mi) of new offshore pipeline. No onshore facilities or pipelines are proposed under the proposed action (Section 4.4.1.2). Table 4.4.7-1 (Section 4.4.7.1) illustrates how each of the impacting factors associated with OCS oil and gas development may affect marine mammals and their habitats, while Figure 4.4.7-1 (Section 4.4.7.1) presents a conceptual model of potential impacting factors for marine mammals from oil- and gas-related activities (including accidental oil spills). The following text presents an overview of potential impacts to marine mammals in and near Cook Inlet from the following routine operations (seismic surveys, construction of offshore facilities and pipelines, operations of offshore facilities and drilling rigs, discharges and waste generation, service vessel and helicopter traffic, and decommissioning) and from accidents.

Seismic Surveys. Section 4.4.7.1 provides a detailed discussion of the issues surrounding anthropogenic noise. In Cook Inlet, noise generated by seismic surveys may have physical and/or behavioral effects on marine mammals, such as (1) permanent or temporary hearing loss, discomfort, and injury; (2) masking of important sound signals; and (3) behavioral responses such as fright, avoidance, and changes in physical or vocal behavior (Richardson et al. 1995; R.A. Davis et al. 1998b; Gordon et al. 1998; Nowacek et al. 2004, 2007). Seismic surveys may also indirectly impact marine mammals by altering prey availability (Gordon et al. 2003, 2004).

Non-Auditory Injury. Direct acoustic impact on tissue, indirect acoustic impact on tissue surrounding a structure, and acoustically mediated bubble growth within tissues from supersaturated dissolved nitrogen gas (if source intense and animals within short distance to source: Nowacek et al. 2007; Zimmer and Tyack 2007); resonance (although not anticipated given resonance frequencies of marine mammal lungs are generally below that of the G&G seismic survey source signal).

Auditory Injury (Temporary or Permanent Hearing Loss). The hearing of marine mammals varies based on individuals, absolute threshold of the species, masking, localization, frequency discrimination, and the motivation to be sensitive to a sound (Richardson et al. 1995). As stated previously, Southall et al. (2007) described the frequency sensitivity in five functional hearing. Similarly, the previous discussion in Section 4.4.7.1 on permanent and temporary loss of hearing in a marine mammal (i.e., PTS, TTS) is incorporated.

Masking. In the case of seismic surveys in Cook Inlet, , the effect of masking is likely to be low relative to continuous sounds such as ship noise. In addition, a few cetaceans are known to increase the source levels of their calls in the presence of elevated sound levels, or to shift their peak frequencies in response to strong sound signals (Dahlheim 1987; Au 1993; review in Richardson et al. 1995; Lesage et al. 1999; Terhune 1999; Nieukirk et al. 2005; Parks et al. 2007). These studies involved exposure to other types of anthropogenic sounds, not seismic pulses, and it is not known whether these types of responses ever occur upon exposure to seismic sounds. If so, these adaptations, along with directional hearing and preadaptation to tolerate some masking by natural sounds (Richardson et al. 1995), would all reduce the importance of masking.

Behavioral Change. As described in Section 4.4.7.1, a number of studies have documented behavioral effects in response to seismic surveys, primarily for mysticetes (Richardson et al. 1995), given their possible overlap between the expected frequencies of best hearing sensitivity (low threshold) in mysticetes and maximal air gun output at source. Given that no direct audiograms of mysticetes have been obtained, it is impossible to define what level of sound above hearing threshold may cause behavioral effects, which could be expected to be variable, complicated and dependent upon more than just the received sound level. For this reason, observations at sea have concentrated on relating received sound levels to observed behavioral changes.

Beluga whales are mid-frequency hearing specialists. The Southall et al. (2007) data review discussed the Finneran et al. (2002b) experiment using a seismic watergun which produced a single acoustic pulse. They conducted this test on one beluga and one bottlenose

dolphin. Based on Finneran et al. (2002), for belugas exposed to a single pulse, TTS-onset occurred with unweighted peak levels of 224 dB re: 1 μPa (peak) and 186 dB re: 1 μPa2-s. The latter is equivalent to a weighted (M- weighting for mid-frequency marine mammals) SEL exposure of 183 dB re: 1 μPa2-s as some of the energy in the pulse was at low frequencies to which the beluga is less sensitive. Adding 6 dB to the former (224 dB) values, Southall et al. (2007) estimates the pressure criterion for injury for mid-frequency cetaceans is 230 dB re: 1 μPa (peak).

Southall et al. (2007) also went on to discuss pinnipeds, which include 16 species and subspecies of sea lions and fur seals (otariids), 23 species and subspecies of true seals (phocids), and two subspecies of walrus (odobenids). They produce a variety of social signals, most occurring at relatively low frequencies but lack the highly specialized active biosonar systems of toothed cetaceans. Because of they are active both in and out of water, pinnipeds communicate acoustically in air and water, have significantly different hearing capabilities in the air versus water, and may be subject to both aerial and underwater noise exposure (Schusterman 1981; Kastak & Schusterman 1998, 1999 in Southall et al. 2007). Therefore, pinnipeds have two different hearing criteria. However, since seismic surveys are less likely to affect pinnipeds, such as Steller sea lions, in air, the in-water criteria is discussed here. It is also acknowledged that there are "among species differences in the exposure conditions that elicited TTS under water" (Southall et al. 2007). Steller sea lion hearing has not specifically been studied but for the purposes of this analysis, it is assumed that their hearing is comparable to that of California sea lions. Comparative analyses of the combined underwater pinniped data (Kastak et al. 2005) indicated that, in the harbor seal, a TTS of *ca*. 6 dB occurred with 25-min exposure to 2.5 kHz OBN with SPL of 152 dB re: 1 μPa (SEL: 183 dB re: 1 μPa2-s). Under the same test conditions, a California sea lion showed TTS-onset at 174 dB re: 1 μPa (SEL: 206 dB re: 1 μPa2-s), and a northern elephant seal experienced TTS-onset at 172 dB re: 1 μPa (SEL: 204 dB re: 1 μPa2-s). Data on underwater TTS-onset in pinnipeds exposed to pulses are limited to a single study. Finneran et al. (2003) exposed two California sea lions to single underwater pulses from an arc-gap transducer. They found no measurable TTS following exposures up to 183 dB re: 1 μPa (peak-to-peak) (SEL: 163 dB re: 1 μPa2-s).

The Southall et al. (2007) criteria do not cover sea otter due to a lack of key hearing data. Further, there is little information on the effects of noise associated with oil and gas exploration on sea otters. Their production and use of sound underwater has not been studied. Airborne sounds are diverse and include high-pitched screams, whines, whistles, deep-throated growls, cooing, chuckles, and snarls (Kenyon 1981). Mothers and their pups communicate by calling, and both call to one another if separated. Most of the sounds in these mother-pup communications are 3-5 Hertz, but there are higher harmonics. Sandegren, Chu, and Vandervere (1973) recorded these calls from a distance of 50 meters in air. It is not known how far sea otters can hear these sounds. Available data do not indicate that sea otters are likely to be seriously impacted by seismic exploration. Riedman (1983, 1984) reported no evident disturbance reactions by sea otters in California coastal waters in response to noise from a full-scale array of air guns (67 L) and a single air gun. No disturbance was noted either when the operating seismic ship passed as close as 1.85 and 0.9 kilometers to sea otters. Sea otters continued to feed, groom, interact with pups, rest, and to engage in other normal behaviors. Riedman (1983, 1984) reported there was also no apparent reaction to the single air gun. Riedman (1983) cautioned

that there are no data for the reactions of sea otters more than 400 meters offshore. Riedman (1983, 1984) reported no evidence of changes in behavior of sea otters during underwater playbacks of drillship, semisubmersible, and production platform sound. Most of the animals studied were 400 or more meters from the source of the sound. Foraging otters continued to dive and feed.

Whales and other marine mammals sometimes continue with important behaviors even in the presence of noise. Some marine mammals may be motivated by feeding opportunities to the extent that they subject themselves to increased noise levels. For example, Native hunters reported to Huntington (2000) that beluga whales often ignore the approach of hunters when feeding, but at other times will attempt to avoid boats of hunters. There is a potential for effects from geophysical survey operations on marine mammals found in Cook Inlet from non-auditory or auditory effects, including PTS, but this is expected to be negligible. Local effects could result to endangered species near noise and other disturbance caused by exploration. For example, in specific areas, particularly near the Barren Islands, these disturbances could affect the haulouts and behavior of Steller sea lions; cause local, short-term effects on the feeding of mysticetes; and locally affect some Cook Inlet beluga whales. Behavior of sea otters could be affected and some displacement of sea otters could occur near areas of activity. Although small numbers of individuals could be affected, regional population or migrant populations of non-endangered marine mammals would experience a negligible effect from disturbance and habitat alteration. The potential for injury is greatly lessened through effective implementation of assumed mitigation. Mitigation that is often implemented to reduce impacts includes use of marine mammal observers, survey vessel speed reductions, and establishment of exclusion zones.

Construction and Operation of Offshore Platforms and Pipelines. Figure 4.4.7-2 (Section 4.4.7.1.1) presents a conceptual model for potential effects of infrastructure construction on marine mammals. Under the proposed action, up to 1 to 3 offshore platforms and 40 to 241 km (25 to 150 mi) of offshore pipeline could be constructed in the Cook Inlet Planning Area (Table 4.4.1-3).

If exploration leads to development and production, impacts likely could occur from the following:

- Noise from construction of pipelines and production facilities;
- Routine and recurring traffic associated with crew and supply activities;
- Domestic wastewaters generated at the offshore facility (the scenario assumes on-platform disposal wells will reinject drilling fluids, muds, cuttings, and produced waters generated from production wells. Discharges and Wastes are described further below.);
- Trash and debris from production activities;

- Gaseous emissions from production facilities, both onshore and offshore, and from transportation vessels and aircraft; and

- Physical placement, presence, and removal of offshore production facilities, including platforms and pipelines to onshore common carrier pipelines.

Noise generated by industrial activities can come from a variety of sources, such as transportation, general machinery use, construction, and human activity. Noise, whether carried through the air or under water, may cause some species to alter their feeding routines, movement, and reproductive cycles. For cetaceans, effects from noise and disturbance associated with development would be much the same as discussed for exploration. The most likely impacts could be the disturbance of sea otters and Steller sea lions that are hauled out and the displacement of females and pups that occur near regions of focused activity. These effects are expected to be extremely local and have no population-level impacts on sea otters or Steller sea lions.

Construction may also cause an alteration in habitat and water quality for marine mammals. However, the activities associated with construction are not likely to significantly affect water quality. Construction activities would increase the turbidity in the water column along segments of the 40-km (25-mi) corridors for up to a few months, but no significant water quality degradation could occur. Further, construction activities could affect benthic organisms and fish (prey species) in the immediate vicinity. Organisms in soft substrates (bivalves and polychaetes) could be adversely affected; however, platforms would add a hard substrate to the marine environment, providing additional habitat for marine plants and animals (for example, kelp and mussels) that require a hard substrate. Therefore, the overall effect of platform and pipeline installation could be to alter species diversity in a small area. Construction activities may disturb pelagic and demersal finfishes and shellfishes, potentially displacing them from preferred habitat, as turbidity, vibrations, and noise from construction increases. Positive effects may accrue because following construction, offshore structures provide refugia to some species and their prey. Any disturbance or displacement should be localized and short term (hours to days to months), limited to only the time of construction and shortly thereafter. Effects are expected to be limited to negligible numbers of individuals in the immediate vicinity of construction activities.

The landfall of a pipeline would avoid sensitive aquatic habitat. The route for the pipeline would be sited inland from shorelines and beaches, and pipeline crossings of anadromous fish streams would be minimized and consolidated with other utility and road crossings of such streams. Pipelines would be buried wherever possible and sited in existing rights-of-way for other utilities or transportation systems wherever possible, such as that provided by the Sterling Highway. The pipelines would be designed, constructed, and maintained to minimize risk to fish habitats from a spill, pipeline break, or other construction activity. Habitat alteration due to pipeline laying and platform construction are expected to be localized and should not cause significant impacts to mobile species.

The immediate response of disturbed individuals or groups could be to leave or avoid the construction areas. This displacement or avoidance could be short or long term in duration,

depending on the duration of the construction activity. Because relatively few individuals would be expected to be affected by the limited amount of construction and few new facilities that would be operating, the construction and operation of new offshore facilities would not be expected to result in population-level effects to affected marine mammals.

Facilities to be constructed and operated under the proposed action may occur in or near beluga whale critical habitat area 2 (76 FR 20180). Construction and operation of offshore platforms and pipelines are expected to have negligible impact to beluga habitat and would not be expected to affect movement of belugas within Cook Inlet. However, if activities were to occur in or near the beluga whale critical habitat, ESA consultation would occur to ensure the protection of the species and their habitat.

Critical habitat designation for the Steller sea lion (50 CFR 226.202) includes a 0.9-km (3,000-ft) radius no-entry zone around designated rookeries within the Cook Inlet Planning Area, as well as a 37-km (20-NM or 23-mi) aquatic avoidance zone around all major rookeries and haulouts. Additional restrictions (50 CFR 223.202) associated with Steller sea lion critical habitat include a 5.5-km (3-NM or 3.4-mi) radius vessel approach zone around listed rookeries, and 1.9-km a (1-NM or 1.2-mi) minimum distance for vessel passing near rookery sites (50 CFR 223.202). Compliance with these critical habitat designations, restrictions, and buffer zones could greatly reduce the likelihood of exposure of Steller sea lion rookeries and haulouts to OCS activities that could occur in the Cook Inlet Planning Area.

Discharges and Wastes. Table 4.4.1-3 presents information on drilling fluids, drill cuttings, and produced waters discharged offshore as a result of the proposed action. Figure 4.4.7-3 (Section 4.4.7.1.1) presents a conceptual model for potential effects of operational waste discharges on marine mammals. Produced water, drilling muds, and drill cuttings are discharged into offshore marine waters in compliance with applicable regulations and permits. Compliance with regulations and permits will limit the exposure of marine mammals to waste discharges.

Up to 500 bbl of drill fluids and 600 tons of drill cuttings will be discharged at each exploration and delineation well (Table 4.4.1-3). Heavier components of these muds and cuttings (such as rock) would settle to the bottom, while lighter components could increase turbidity around the drill site. While this increased turbidity could cause marine mammals to avoid the area, any increase in suspended solids associated with the discharge of drilling wastes would be rapidly diluted and dispersed, and thus not be expected to adversely affect marine mammals in the area. Drilling fluids and cuttings associated with development and production wells would be treated and disposed of in the wells; therefore, negligible impacts to marine mammals from these wastes are expected.

The OCS-related vessels supporting exploration activities and the construction and operation of offshore platforms and pipelines will generate waste fluids (such as bilge water) which may be discharged to the surface water. Such discharges, if allowed, would be regulated under applicable NPDES permits. Sanitary and domestic wastes would be processed through shipboard waste treatment facilities before being discharged overboard, and deck drainage would also be processed aboard ship to remove oil before being discharged. Because of the low level of

expected vessel traffic, relatively small volumes of operational wastes would be discharged, and these would be rapidly diluted and dispersed. Thus, permitted waste discharges from OCS construction and service vessels are expected to have negligible impacts on marine mammals.

Solid debris can adversely impact marine mammals through ingestion or entanglement (Marine Mammal Commission 2003). Mammals that ingest debris, such as plastics, may experience intestinal blockage, which in turn may lead to starvation, while toxic substances present in the ingested materials (especially in plastics) could lead to a variety of lethal and sublethal toxic effects. Entanglement in plastic debris can result in reduced mobility, starvation, exhaustion, drowning, and constriction of, and subsequent damage to, limbs caused by tightening of the entangling material. The discharge or disposal of solid debris into offshore waters from OCS structures and vessels is prohibited by the BOEM (30 CFR 250.40) and the USCG (International Convention for the Prevention of Pollution from Ships [MARPOL], Annex V, P.L. 100-220 [101 Statute 1458]). Thus, impacts to marine mammals from entanglement in or ingestion of OCS-related trash and debris under the proposed action are expected to be negligible to minor.

Drilling fluids and produced waters are not anticipated to be discharged during production. The hydrodynamic processes in the Cook Inlet suggest the water column generally is well mixed, and dilution would reduce the concentration of the substances in the discharges. Degradation processes also act to continuously reduce the concentrations of many substances deliberately or accidentally released into the environment. We do not expect the discharge of drilling muds and cuttings and other discharges associated with exploration drilling to have any effect on the overall quality of Cook Inlet water. Within a distance of between 100 and 200 m (328 and 656 ft) from the discharge point, the turbidity caused by suspended-particulate matter in the discharged muds and cuttings would dilute to levels that are less than the chronic criteria (100–1,000 parts per million) and within the range associated with the variability of naturally occurring suspended particulate matter concentrations. Mixing in the water column would reduce the toxicity of the drilling muds that already fall into the "practically nontoxic" category to levels that would not be harmful to organisms in the water column. In general, the amounts of additives in the other discharges are likely to be relatively small (from 4 to 400 or 800 liters/month and diluted with seawater several hundred to several thousand times before being discharged into the receiving waters. The potential effects in any of the areas where there are permitted discharges would last for about 3–4 months for each exploration well drilled.

<u>Vessel and Aircraft Traffic.</u> There may be up to 9 surface vessels and 9 helicopter trips per week under the proposed action (Table 4.4.1-3). Figure 4.4.7-4 (Section 4.4.7.4) presents a conceptual model for potential effect of vessel traffic on marine mammals. Vessel traffic could occur during seismic exploration, drilling and platform construction, platform operation, and platform decommissioning. Generally, marine mammals may be affected by direct collisions with vessels or by visual and noise disturbances.

In addition to possible collision-related injuries and/or mortalities, cetaceans and pinnipeds in the vicinity of an OCS-related vessel may be disturbed by the presence of vessels and helicopters and the noise they generate. Noises emitted by shipping vessels are expected to range between 140 dB re 1 μPa for smaller vessels to 198 dB re 1 μPa for larger tankers and

cargo ships (Heathershaw et al. 2001; Erbe 2002; Hildebrand 2004). Helicopters flying at 150 m (492 ft) altitude are expected to emit noises received at ground level of approximately 80 to 86 dB re 20 μPa (Born et al. 1999). Reactions of cetaceans, including both odontocetes and mysticetes, may include apparent indifference, cessation of vocalizations or feeding activity, increases in vocal behavior, and evasive behavior (e.g., turns, diving, etc.) (Richardson et al. 1995; Nowacek and Wells 2001; Buckstaff 2004; Doyle et al. 2008). Noise from service vessels may also mask cetacean sound reception (MMS 2003e). Disturbed individuals would be expected to cease their normal behaviors and likely move away from the vessel. Following passage of the vessel, affected individuals may return and resume normal behaviors.

Cetaceans, such as humpback whales, near the Barren Islands and the southern portions of the Cook Inlet also could be negatively affected by vessel transport and construction activities. However, this area has a high volume of fishing- and tourism-related vessel traffic in the summer months when the whales are present. The incremental addition of noise from two vessels per day associated with the proposed action is unlikely to add significantly to this existing noise.

Based on their distributions, humpbacks are more vulnerable to aircraft noise than fin whales. Shallenberger (1978) reported that some humpbacks were disturbed by overflights at 305 m (1,000 ft), whereas others showed no response at 152 m (500 ft). As with the response to air gun noise, pods varied in their response. Humpbacks in large groups showed little or no response but some adult-only groups exhibited avoidance (Herman et al. 1980). Other authors report no response (for example, Friedl and Thompson, 1981). Due to concerns about the impacts of helicopters in Hawaiian waters, helicopters are prohibited from approaching within a slant range of 1,000 ft, or 305 m, from humpbacks (National Marine Fisheries Service 1987).

Belugas could be disturbed by noise and disturbance from exploration and development-related aircraft, especially helicopters. Belugas reacted to aircraft flying at 150–200 m (492–656 ft) by diving for longer periods, reducing surfacing time and sometimes swam away (see references cited in Richardson et al. 1995). They did not respond to aircraft at 500 m (1,640 ft). Richardson et al. (1991) found variable reactions to turbine helicopters and fixed wing aircraft in offshore waters near Alaska. Some individuals exhibited no discernible response even when the aircraft was within 100–200 m (328–656 ft), whereas other individuals dove abruptly, looked upward, or turned sharply in response to aircraft at altitudes up to 460 m (1,510 ft). In shallow summering areas, belugas sometimes respond to aircraft by diving or swimming away (Finley et al. 1982; Gales 1982; Caron and Smith 1990).

Vessel traffic may disturb pinnipeds and sea otters (which are discussed further below) in the water and hauled out on ice or terrestrial habitats. For example, when approached too closely or disturbed too often, harbor seals are known to abandon their favorite haul-out sites or their pups (Kinkhart et al. 2008). Hauled out pinnipeds may exhibit behavioral reactions to the physical disturbance of an approaching vessel or aircraft by exhibiting startle reactions, slipping into the water. In recognition of their vulnerability to loud and startling noises, Steller sea lion critical habitat has been defined to include a terrestrial zone that extends 914 m (3,000 ft) landward from the baseline or base point of each Steller sea lion major rookery or major haulout and an air zone that extends 914 m (3,000 ft) above the terrestrial zone, as measured at sea level

around them. Assuming aircraft flying to any platforms maintain sufficient distances from these rookeries, based on recognition of this critical habitat, it not likely this form of disturbance would have a major impact on Steller sea lions. However, given observations by Withrow et al. (1985) cited above, it is possible that sea lions could be negatively affected by oil- and gas-activity-related helicopters (and possibly by other noise) operating at further distances. Under the proposed scenario, one to two helicopter trips per day would be made to oil and gas operations from Kenai or other sites along the western Kenai Peninsula shore. In most of the proposed Cook Inlet multiple-sale area, these flights would not require transit over any terrestrial components of Steller sea lion critical habitat and adverse effects could easily be avoided. The greatest potential for such disturbance could come from helicopters transiting to blocks on the far side of the Barren Islands if flights originated on the Kenai Peninsula and stayed, as geography permits, near land until crossing of the entrances of Cook Inlet was required to reach drill (or production) sites on the far sides of the Barren Islands.

Major rookeries in and near the Cook Inlet include Outer Island, Sugarloaf Island, Marmot Island, Chirikof Island, and Chowiet Island. There are several major haulouts in and near the Cook Inlet, 20-NM aquatic zones, and an aquatic foraging area in Shelikof Strait. All of these are part of Steller sea lion critical habitat. Support-vessel traffic would be unlikely to adversely affect these habitats as long as operators avoided transiting near to the rookeries or haulouts or deliberately approaching sea lions in the water. Critical habitat of Steller sea lions is unlikely to be impacted by exploration activities. As noted above, terrestrial zones are legally protected from activities degrading them by disturbance. Shelikof Strait was designated as critical habitat because of its proximity to major rookeries and important haulouts, its use by foraging sea lions and its value as an area of high forage-fish production. Any adverse impacts of oil and gas development that adversely affect the production and availability of prey to Steller sea lions in this and other critical habitat could adversely modify the habitat. Aircraft restrictions associated with Steller sea lion critical habitat protection (50 CFR 223.202; 50 CFR 226.202) could further reduce the likelihood of helicopter flights impacting designated rookery sites for this listed species. Careful planning of flight paths to avoid rookeries and haulouts of other pinnipeds could further reduce or eliminate the potential for disturbing animals in these habitats.

Boat traffic associated with OCS oil and gas exploration activity could disturb sea otters in specific areas. In summer, these impacts are likely to be insignificant compared to the quantity of fishing, tourism, shipping, and other boat traffic in the region. In winter, boat traffic in a remote region could have local impacts on distribution of females and pups. While male sea otters sometimes habituate to heavy boat traffic, female sea otters, particularly those with pups, are sensitive to disturbance. Garshelis and Garshelis (1984) reported that sea otters in Prince William Sound avoided waters with frequent boat traffic but reoccupy these areas when boats are less frequent. Rotterman and Monnett (2002) concluded that disturbance after the *Exxon Valdez* oil spill was sufficient to keep sea otters from feeding habitat in certain bays in oiled areas of Prince William Sound. Udevitz et al. (1995) reported that about 15% of sea otters along boat survey transects are not detected because they move away from the approaching boat. Boat traffic could disturb resting patterns of sea otters. Sea otters in Alaska haul out regularly. Sea otters that are hauled out will often move into the water with the approach of a boat. Garrott, Eberhardt, and Burn (1993) reported that sea otters on shore would move into the water with approach of a single small motorboat moving parallel to and 100 m (328 ft) from shore.

As previously discussed, the FAA Advisory Circular 91-36D (FAA 2004) encourages pilots to maintain higher than minimum altitudes over noise-sensitive areas. Also, guidelines and regulations issued by NMFS under the authority of the MMPA include provisions specifying helicopter pilots to maintain an altitude of 305 m (1,000 ft) within 91 m (300 ft) of marine mammals (MMS 2007d). Helicopter operations would only be expected to occur below specified minimums during inclement weather. In MMS (2007d), it was concluded that this could occur for about 10% of helicopter operations. Because of the low level of vessel and aircraft traffic that could occur under the proposed action, potential impacts to marine mammals from this traffic would likely be limited to a few individuals, be largely short-term in nature, and not result in population-level effects.

Decommissioning. Under the proposed action, no platforms will be removed with explosives from the Cook Inlet Planning Area. Therefore, potential impacts of decommissioning on marine mammals, as summarized in Figure 4.4.7-4 (Section 4.4.7.1.1), will not occur.

Accidents. Accidental oil spills could occur in Cook Inlet under the proposed action (Section 4.4.2). Table 4.4.2-1 presents the oil spill assumptions for the proposed action, while Figure 4.4.7-5 (Section 4.4.7.1.1) presents a conceptual model for potential effects of oil spills on marine mammals. Small oil spills (≤1,000 bbl) break-up and dissipate within hours to a day (MMS 2009a). Larger spills, particularly those that continue to flow fresh hydrocarbons into waters for extended periods (i.e., days, weeks, or months), pose an increased likelihood of impacting marine mammal populations (MMS 2008b). While the numbers have been steadily decreasing since the 1970s, operational discharges such as tank washing with seawater, oil content in ballast water, and fuel oil sludge are among the sources of small oil spills from tankers (Jernelöv 2010). Large oil spills from tankers have decreased significantly in recent years (modern tankers have double hulls and are sectioned to prevent losing the ship's entire cargo and sea lanes have been established) while spills from ageing, ill-maintained or sabotaged pipelines have increased.

Characteristics of impacts (i.e., acute vs. chronic impacts) depend on the magnitude, frequency, location, and date of accidents; characteristics of spilled oil; spill-response capabilities and timing; and various meteorological and hydrological factors. Chronic or acute exposure may result in harassment, harm, or mortality to marine mammals. Studies have shown varying results. Marine mammals made no apparent attempt to avoid spilled oil in some cases (Smultea and Würsig 1995); however, marine mammals have been observed apparently detecting and avoiding slicks in other reports (Geraci and St. Aubin 1990). Since there are reports of oiled marine mammals exposure to hydrocarbons persisting in the sea following the dispersal of an oil slick may result in sublethal impacts (e.g., decreased health, reproductive fitness, and longevity; and increased vulnerability to disease) to marine mammals.

Small and large spills occurring in the Cook Inlet Planning Area are not expected to affect the listed blue, sei, sperm, or North Pacific right whales, as these species occur only infrequently, if at all, within the area (MMS 2003e). However, it is important to note that any impacts to individuals of species already in decline (listed species) that affect their survival or reproductive capacity could result in population-level impacts. The endangered fin and humpback whales, as well as the minke and killer whales, which do occur within the planning

area, could be affected by accidental spills occurring in or reaching the Shelikof Strait. Gray whales migrating past Cook Inlet could be exposed to accidental spills occurring near the Kennedy and Stevenson entrances to Cook Inlet. Accidental spills in the Cook Inlet Planning Area could also expose smaller cetacean species (such as Dall's porpoise) and pinnipeds foraging in open marine waters. Because of the small number and mostly small size of potential spills that could occur under the proposed action, exposures of these species to spilled oil would be temporary and likely affect only a few individuals (MMS 2003e).

Oil spills could have serious impacts on pinnipeds during periods when they are concentrated at rookeries (typically, late spring, summer, and early fall). At such times, spills and/or spill response operations have the potential to disturb hundreds of pinnipeds. If a spill contaminates a rookery, a significant population decline could occur (Calkins et al. 1994). Sea otters, sea lions, and harbor seals had elevated hydrocarbon levels in areas contaminated by the *Exxon Valdez* oil spill, but only sea otters and harbor seals showed population declines associated with the spill (Loughlin et al. 1996).

Spills occurring in or reaching coastal areas, especially sheltered coastal habitats such as bays and estuaries, pose the greatest risk to marine mammals. These spills may be more likely to affect species such as the sea otter and the Steller sea lion that use coastal habitats for pupping, foraging, and resting. A large spill contacting an active pinniped rookery site could result in population-level effects for some species, while spills in nearshore areas could result in the direct oiling of large numbers of pinnipeds and sea otters, and adversely affect local populations of some of these species (primarily the sea otter and fur seals), while sublethal effects may be incurred by all individuals ingesting or inhaling spilled oil.

An estimated 3,905 sea otters were killed by the *Exxon Valdez* oil spill (EVOS), and sea otter abundance in some oiled areas remains under pre-spill estimates, suggesting that sea otters have not fully recovered (USFWS 2008). Oiling and ingestion of oil-contaminated shellfish may have affected reproduction and caused a variety of long-term sublethal effects (Fair and Becker 2000). The recovery of sea otters may be constrained by residual spill effects resulting from elevated mortality and emigration (Bodkin et al. 2002). According to Frost and Lowry (1994), initially following the *Exxon Valdez* oil spill in Prince William Sound, Alaska (Frost et al. 1994a, b; Lowry et al. 1994; Spraker et al. 1994), it was claimed an estimated 300+ harbor seals died as a result of crude oil exposure. Subsequent investigations revealed that there were no significant quantities of oil in the tissues (liver, blubber, kidney and skeletal muscles) of harbor seals exposed to the *Exxon Valdez* spill (Bence and Burns 1995), and that the cause of the decreasing trend in harbor seal numbers since the spill (4.6% per year) is complicated because seal populations were declining prior to the spill (Frost et al. 1999). A further analysis of harbor seal population trends and movements in Prince William Sound concluded harbor seals moved away from some oiled haul-outs during the Exxon Valdez spill (Hoover-Miller et al. 2001) and that the original estimate of 300 or more harbor seal mortalities may have been overstated. St. Aubin (1990) found that the greatest effect of a spill was on young seals in cold water and that no mortalities were reported after a well blowout near Sable Island in 1984.

As discussed in Section 4.4.7.1.1, oil spill response activities may affect marine mammals through exposure to spill response chemicals (e.g., dispersants or coagulants) and through behavioral disturbance during cleanup and restoration operations. The chemicals used during a spill response are toxic, but are considered much less so than the constituents of spilled oil (Wells 1989), although there is little information regarding their potential effects on marine mammals. The presence of, and noise generated by, oil spill response equipment and support vessels could temporarily disturb marine mammals in the vicinity of the response action, with affected individuals likely leaving the area. While such displacement may affect only a small number of animals, cleanup operations disturbing adults in pup-rearing areas may decrease pup survival and result in population-level effects. While some smaller animals can be collected and examined closely, impacts on whales from oil spills are difficult to assess because large numbers of most of the species cannot be easily captured, examined, weighed, sampled, or monitored closely for extended periods of time. Some authors have attempted to link beached carcasses with spill effects, particularly gray whales. Large numbers of gray whale carcasses were discovered previously in other parts of the range (see examples in Loughlin 1994). During the oil spill off Santa Barbara in 1969, an estimated 80,000 bbl of oil may have entered the marine environment. Gray whales were beginning their annual migration north during the spill. Whales were observed migrating northward through the slick. Several dead whales were observed and carcasses recovered, including six gray whales. Brownell (1971, as reported by Geraci 1990) acknowledged that these whales totaled more than the usual number of gray whales and dolphins stranding annually on California shores, and concluded that increased survey efforts had led to the higher counts. Several of the whales examined were thought to have died from natural causes, and one may have been harpooned. No evidence of oil contamination was found on any of the whales examined. The Battelle Memorial Institute concluded the whales were either able to avoid the oil, or were unaffected when in contact with it. Similarly, extensive beached carcass surveys made after the EVOS revealed a number of gray whales. The number of carcasses found was the result of such an atypical survey effort and were comparable to gray whale strandings along the pacific coast, well south of the EVOS area.

Catastrophic Discharge Event. If a catastrophic discharge event occurs, there is greater potential for more severe effects compared to the risk of effects from a large oil spill. A catastrophic discharge event would result in sustained degradation of water quality and, to a lesser extent, air quality that would impact marine mammals from direct contact, inhalation, and ingestion (either directly or indirectly through the consumption of oiled forage or prey species). These effects would be significant, causing a multitude of acute and chronic effects. Additional effects on marine mammals would occur from water and air quality degradation associated with response and cleanup vessels, *in situ* burning of oil, dispersant use, discharges and seafloor disturbances from relief well drilling, and activities on shorelines associated with cleanup, booming, beach cleaning, and monitoring. A catastrophic discharge event has the potential to increase the area and duration of an oil spill, thereby increasing the potential for population-level effects, or at a minimum, an increase in the number of individuals killed. A catastrophic discharge event in Cook Inlet would potentially impact marine mammals throughout much of south central Alaska and has the potential to increase the area and duration of an oil spill, thereby increasing the potential for population-level effects, or at a minimum, an increase in the number of individuals killed. For example, one resident killer whale pod (AB Pod) and one transient killer whale population (AT1 Group) suffered losses of 33 and 41%, respectively, in the year

following the *Exxon Valdez* oil spill. Sixteen years after the spill, the resident pod had not returned to pre-spill numbers, while the transient population lost nine members following the spill and continued to decline to the point that it is listed as depleted under the MMPA (Matkin et al. 2008). Additionally, sea otters and harbor seals showed population declines associated with the spill (Loughlin et al. 1996). An estimated 3,905 sea otters were killed by the *Exxon Valdez* oil spill and sea otter abundance in some oiled areas remains under pre-spill estimates, suggesting that sea otters have not fully recovered (USFWS 2008). An estimated 302 harbor seals were killed by the *Exxon Valdez* oil spill, probably due to the inhalation of toxic fumes (Frost and Lowry 1994). Contraction of the Cook Inlet beluga whale population northward into the upper portions of the inlet makes the population more vulnerable to a catastrophic discharge event (NMFS 2008).

Terrestrial Mammals. There are approximately 40 species of terrestrial mammal that occur in southern Alaska. Among these, 10 species may regularly use mainland and island habitats adjacent to or near the Cook Inlet Planning Area (Section 3.8.1.2.2), and thus could be affected by OCS-related activities.

Routine Operations. Under the proposed action, up to 80 km (50 mi) of new onshore pipeline would be installed along Cook Inlet, which could result in up to 364 ha (900 ac) of soil disturbance. The area disturbed represents an extremely small portion of terrestrial wildlife habitat that occurs inshore of the Cook Inlet Planning Area. Wildlife are expected to avoid the area where construction of new pipeline is occurring. Few additional impacts, other than those that might occur from helicopter overflights, would occur on terrestrial mammals. Helicopter traffic could disturb wildlife near the existing onshore facilities and pipelines or along the overland portions of flight paths between the existing onshore facilities and new offshore platforms. The aircraft effects on wildlife vary by species, habitat type, and the wildlife activity occurring at the time of the overflight. During overflights, some wildlife will cease their normal behaviors until the aircraft has passed and then resume their normal activity; others may flee the area, while some species may become habituated and experience no disturbance (Harting 1987). Aircraft overflights would be relatively infrequent (no more than three flights per week per offshore platform). Thus, no long-term, population-level effects are expected from aircraft overflights associated with routine operations.

Accidents. An offshore oil spill that contaminates beaches and shorelines could affect terrestrial mammals, such as the Sitka black-tailed deer, brown bear, and river otter, that forage in intertidal habitats (*Exxon Valdez* Oil Spill Trustees 1992). An onshore oil spill could similarly affect terrestrial animals, such as American black bear or moose that may forage in the area of the onshore pipeline. Spills contacting high-use areas, such as coastal habitats along Shelikof Strait heavily used by brown bears, could locally affect a relatively large number of animals (MMS 2003e). The impacts on wildlife from an oil spill would depend on such factors as the time of year and volume of the spill, type and extent of habitat affected, and home range or density of the wildlife species. The potential effects on wildlife from oil spills could occur from direct contamination of individual animals, contamination of habitats, and contamination of food resources (ADNR 1999). Acute (short-term) effects usually occur from direct oiling of animals, while chronic (long-term) effects generally result from such factors as accumulation of contaminants from food items and environmental media (e.g., sediments).

Terrestrial mammals directly contaminated by an accidental release could inhale volatile organics and/or ingest oil while grooming contaminated fur (MMS 1996b). Exposure may also occur through the consumption of contaminated foods. The moose and opportunistic omnivores, such as brown and American black bears, may experience a greater potential of exposure than many other wildlife species.

Staging and support activities for a large spill cleanup could temporarily displace terrestrial mammals not only from the contaminated habitats but also from nearby uncontaminated habitats. Depending on the effectiveness of the cleanup activities, chronic oil exposure may continue for years in some habitats.

Catastrophic Discharge Event. The PEIS analyzes a CDE of 75 to 125 thousand bbl (Table 4.4.2-2). If a CDE occurs, there is greater potential for more severe effects compared to the risk of effects from a large oil spill. A catastrophic discharge event would result in sustained degradation of water quality, shoreline terrestrial habitats, and, to a lesser extent, air quality that could impact terrestrial mammals from direct contact, inhalation, and ingestion (either directly or indirectly through the consumption of oiled forage or prey species). These effects could be significant, causing a multitude of acute and chronic effects. Additional effects on terrestrial mammals would occur from land and air quality degradation associated with response and cleanup vessels, *in situ* burning of oil, dispersant use, and activities on shorelines associated with cleanup, booming, beach cleaning, and monitoring. A CDE has the potential to alter terrestrial mammal habitats and populations. However, only minor impacts to terrestrial mammals were observed from the *Exxon Valdez* oil spill. No Sitka black-tailed deer were found whose death could be attributed to the *Exxon Valdez* oil spill. However, some deer that fed on kelp in the intertidal areas had slightly elevated concentrations of petroleum hydrocarbons in their tissues (*Exxon Valdez* Oil Spill Trustees 1992). Several river otter carcasses were found following the *Exxon Valdez* oil spill. Analysis showed that they accumulated petroleum hydrocarbons. Also, home ranges in oiled areas were twice that of unoiled areas, suggesting that increased foraging was required to find sufficient food resources. Body lengths, weights, and dietary diversity were also lower in oiled areas (*Exxon Valdez* Oil Spill Trustees 1992). Lewis et al. (1991) examined the impacts of the *Exxon Valdez* oil spill on Katmai National Park coastal brown bears. Of the 27 bears captured, 4 had been exposed to crude oil. Bears were also observed with oil on their fur, consuming oiled carcasses, and presumably feeding on razor clams in the intertidal area. One yearling bear was found dead with high concentrations of aromatic hydrocarbons in its bile. Crude oil elements were also found in the fecal samples of the bear's mother. However, no population-level impacts on the bears of Katmai were indicated.

4.4.7.1.3 Alaska – Arctic.

Marine Mammals. There are 14 resident or seasonal species of marine mammals in the Arctic region, including 8 species of cetaceans, 5 species of pinnipeds, and 1 fissiped species (Table 3.8.1-4; Section 3.8.1.3.1). All of the species occur in the Chukchi Sea; the Pacific walrus and the bearded and ribbon seals also occur in the western portions of the Beaufort Sea, while the ringed and spotted seals, bowhead and beluga whales, and polar bear occur throughout both seas (Section 3.8.1.3.1). The endangered fin and humpback whales are only occasional

transients in the southern portion of the Chukchi Sea during summer. The endangered bowhead whale migrates through the Chukchi and Beaufort Seas between its wintering grounds in the Bering Sea and its summering grounds primarily in the Canadian portion of the Beaufort Sea (Figure 3.8.1-4; Section 3.8.1.3.1). However, some individuals remain in the Alaska portion of the Beaufort Sea and in the Chukchi Sea during summer. Thus, the bowhead whale has the greatest potential of the endangered whale species to occur in areas where OCS-related activities are occurring and be affected by normal operations or oil spills. The potential for this would be most probable during the bowhead whale's spring and fall migrations that generally occur from March through June and September through November, respectively (Hill and DeMaster 1998).

There are at least 9 species of seasonal or resident cetaceans- bowhead, fin, humpback, minke, gray, beluga, and killer whales; harbor porpoise (Suydam and George, 1992) occur with rare or observational accounts of narwhals. Bearded seals occur throughout the Beaufort Sea and into the Canadian High Arctic and Greenland. There are more seasonal residents (3,150) than year-long resident bearded seals, but some seals remain in the Beaufort year-round. Spotted seals have small haul-outs east to the Colville River Delta and historically to Prudhoe Bay. Spotted seals are rare past Harrison Bay and are not known to occur throughout the Beaufort Sea. Gray whales occur primarily nearshore and are occasionally found as far east as the Canadian Beaufort Sea. The continental shelf in the Beaufort is much narrower than in the Chukchi, and therefore it can support fewer gray whales. Humpback whales have been observed nearshore in the Chukchi Sea and as far east as the Western Beaufort Sea. Observations of fin whales have occurred in the southern and east central Chukchi Sea. Observations of a few individuals have been more consistent over the last five years during the open water period.

Routine Operations. Table 4.4.7-1 (Section 4.4.7.1) illustrates how each of the impacting factors associated with OCS oil and gas development may affect marine mammals and their habitats, while Figure 4.4.7-1 (Section 4.4.7.1) presents a conceptual model of potential impacting factors for marine mammals from oil and gas-related activities (including accidental oil spills). The following text presents an overview of potential impacts to marine mammals in and near the Beaufort and Chukchi Sea Planning Areas from the following routine operations (seismic surveys, construction of offshore facilities and pipelines, operations of offshore facilities and drilling rigs, discharges and waste generation, service vessel and helicopter traffic, and decommissioning) and from accidents.

Seismic Surveys. During offshore exploration, seismic surveys conducted in offshore areas and in lagoon systems could affect marine mammals. Seismic surveys generally occur during the ice-free periods, normally from July to October (NMFS 2001b). In the Beaufort Sea, there are also on-ice seismic surveys, which may impact ice seals and polar bear. Noise generated by seismic surveys may have physical and/or behavioral effects on marine mammals, such as hearing loss, discomfort, and injury; masking of important natural sound signals, including communications among individual whales; behavioral responses such as flight, avoidance, displacement of migration route, and changes in physical or vocal behavior (Richardson et al. 1995; Davis et al. 1998; Gordon et al. 1998; MMS 2003e). It has not been possible to predict the type or magnitude of responses to such surveys (and other oil and gas activities) nor to evaluate the potential effects on populations (NRC 2003a). However, there is no evidence to suggest that routine seismic surveys may result in population-level effects for any

of the marine mammal species. There have been no documented instances of deaths, physical injuries, or physiological effects on marine mammals from seismic surveys (MMS 2004c).

Cudahy and Ellison (2002) indicated that tissue damage from exposure to underwater low frequency sound will occur at a damage threshold on the order of 180 to 190 dB or higher. The onset of level A harassment impacts per the MMPA (i.e., the potential to injure a marine mammals or marine mammal stock) for cetaceans and walrus is 180 dB re 1 μPa (rms) RL and for pinnipeds and polar bears is 190 dB re 1 μPa (rms) RL, while the onset of level B harassment impacts per the MMPA (i.e., the potential to disturb a marine mammal or marine mammal stock by causing disruption of behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering) for marine mammals is 160 dB re 1 μPa (rms) RL.

Noise from air guns and survey vessels could disturb nearby marine mammals that may be foraging in open waters or using floe ice for resting, birthing, and the rearing of young. These disturbances would be largely limited to the immediate area of the survey vessel, although animals within a few kilometers of seismic operations may be affected (Richardson et al. 1986). Because cetaceans and pinnipeds are highly mobile species, they may leave an area when a seismic survey is initiated, thereby greatly reducing their exposure to maximal sound levels and, to a lesser extent, masking frequencies. However, if they surveys occur during the winter or spring when areas of open water are restricted or isolated, young ringed or bearded seals may have some difficulty avoiding the on-ice seismic surveying, and if there are ice breakers, some ringed seal pups could be crushed inside of their lairs. If an animal is able to relocate, would likely resume its normal behavioral patterns. During the open water season, displaced or disturbed individuals may return to the area and/or resume normal behavioral patterns after the survey activities have ceased, but this is not necessarily also true for individuals displaced from on-ice seismic surveys.

Among cetaceans, the odontocetes generally demonstrate relatively poor low-frequency hearing sensitivity, and thus might not be expected to experience hearing loss from seismic surveys (unless they are in close proximity to air gun arrays) (MMS 2004a). The odontocetes in the Arctic region (beluga and killer whales and the less frequently encountered harbor porpoise and rare narwhal) may respond behaviorally to seismic surveys by leaving the areas where seismic surveys are being conducted. Unless the surveyed area is further developed, such displacement would be temporary and not expected to result in long-term impacts to either individual animals or populations of these species.

The mysticetes, which include the endangered bowhead, fin, humpback whales, as well as gray and minke whales, are considered to possess good hearing sensitivity at low frequencies down to approximately 10 Hz, and many of their vocalizations occur in the low tens to a few hundred Hz (Richardson et al. 1995; Crane and Lashkari 1996; Ketten 1998; Stafford et al. 1998). Seismic survey air gun arrays output maximal energy in the region of a few tens of Hz, which overlaps with the expected lower end of the hearing sensitivity of mysticetes. Thus, the mysticetes that occur regularly in the Chukchi and Beaufort Seas may be affected by seismic surveys. Exposure of these whales to maximal air gun output during a seismic survey may result in behavioral changes such as area avoidance or short-term or long-term hearing loss, while less than maximal exposure could result in masking effects (Ljungblad et al. 1988b;

Malme et al. 1989). It may also alter or deter migration paths and displacement may then result in fewer feeding opportunities where prey are aggregated.

Bowhead whales can detect sounds produced by seismic pulses from 10 to 100 km (6 to 62 mi) away from the source (MMS 2002a). Bowheads have been rarely observed within 20 km (12 mi) of where air guns are operating. However, occurrences of bowheads within 20 km (12 mi) are similar to those outside this radius about 12 to 24 hours after seismic operations cease (MMS 2002a). At seismic pulses as high as 248 dB re 1 μPa-m, bowhead whales respond by orienting away from the seismic vessels at distances up to 7.5 km (4.7 mi) (Richardson et al. 1986). While high-frequency seismic noises have the potential to permanently harm cetaceans, there is evidence that some cetaceans may habituate to lower-level seismic noises. For example, Richardson et al. (1986) found that bowhead whales initially responded to moderate underwater noise frequencies (110 to 115 dB re 1 μPa-m) by avoiding areas in which seismic exploration activities were occurring, but later became tolerant to prolonged noise exposure. Migrating bowhead whales have also been shown to exhibit avoidance of a 20-km (12-mi) area around seismic surveying where received levels were estimated to be approximately 120 to 130 dB re 1 μPa at 1 m (Richardson et al. 1999). Given their mobility and avoidance reactions to approaching seismic vessels, it is unlikely that whales would occur close to injurious noise levels (MMS 2003e). Some bowhead whales may tolerate noise levels that may reach injury levels when they are engaged or highly motivated during behaviors such as feeding, while others may exhibit more sensitivity, such as females with calves.

Todd et al. (1996) found that humpback whales exhibited little behavioral reaction to underwater anthropogenic noises as high as 153 dB re 1 μPa. However, Richardson et al. (1990) observed that bowhead whales in close proximity to underwater anthropogenic noise sources (<1 km [0.6 mi]) reacted to sound levels as low as 122 dB re 1 μPa by ceasing their feeding behaviors and moving away from the noise source. Watkins and Scheville (1975) observed sperm whales cease vocalization behaviors in the presence of underwater anthropogenic sounds at frequencies between 6 and 13 kHz. Anthropogenic underwater noises as low as 180 dB re 1 μPa can elicit startle reactions and avoidance behaviors in sperm whales and gray whales (Malme et al. 1984; Andre et al. 1997). Malme et al. (1984) also observed behavioral reactions (avoidance) in gray whales in response to received levels of around 164 dB re 1 μPa at 1 m (3 ft); and Richardson et al. (1995) reported that individual gray whales that reacted to noise generally slowed, turned away from the noise source, and increased their respiration rates. Humpback whales off the western coast of Australia changed course at 3 to 6 km (1.9 to 3.7 mi) from an operating seismic survey vessel, with most animals maintaining a distance of 3 to 4 km (1.9 to 2.5 mi) from the vessel. Humpback whale groups containing females involved in resting behavior were more sensitive than migrating animals and showed an avoidance response estimated at 7 to 12 km (4.3 to 7.5 mi) from a large seismic source (McCauley et al. 2000).

As discussed for the GOM (Section 4.4.7.1.1), it is assumed that BOEM will continue to require ramp-up of seismic activities coupled with visual monitoring and clearance within an exclusion zone around a seismic array. These actions would reduce the potential for cetaceans to be exposed to sound levels that could affect hearing or behavior. The avoidance reactions of whales to approaching seismic vessels would normally prevent exposure to potentially injurious noise pulses (NMFS 2001b). The geographic scale of any potential noise effect is probably

relatively small compared to the total habitat used by whales in the Chukchi and Beaufort Seas (MMS 2004c). For example, in the Chukchi Sea, fall migrating bowhead whales are commonly seen from the coast to about 150 km (93 mi) offshore (MMS 2004c), while fall migration in the Beaufort Sea occurs over a 100 km (62 mi) wide corridor (Malme et al. 1989).

Pinnipeds in close proximity to sources of seismic noise may experience intense sound pressure levels that could cause temporary hearing loss by masking ambient noise levels, causing damage to hearing structures and body tissues (Richardson et al. 1995). Generally seals move away from seismic vessels, although some are observed swimming in the bubbles generated by large seismic air gun arrays (MMS 2003e).

Walrus hearing has been reviewed in the Pacific Walrus Status Review (Garlich Miller et al. 2011). If exposed to seismic surveys, some walruses may be temporarily displaced or may even experience temporary threshold shifts in hearing. Seismic surveys occur in open water where walruses may be feeding or passing through but are less likely to be present in large numbers (USFWS 2008; BOEMRE 2010e).

Noises associated with seismic surveys are less likely to harm fissipeds than cetaceans (MMS 2007d). It is unlikely that polar bears are affected by seismic noise in water, as they swim with their heads above water, reducing the risk of hearing damage. In contrast, on-ice seismic work during the winter is more apt to disturb polar bears. Females with cubs will abandon den sites when a seismic crew is operating nearby (Amstrup 1993; Linnell et al. 2000). Premature den abandonment could lead to an increase in cub mortality. Polar bears may not be very sensitive to noise (Richardson 1995 in Richardson et al. 1995), but bears in the vicinity of a seismic survey may leave the area. Female bears excavate dens in snow on drifting pack ice and on land. Pregnant females and females with newborn cubs in maternity dens are sensitive to noise and may be disturbed by seismic exploration, and have been reported to abandon den sites when seismic crews are operating nearby (Amstrup 1993). Such abandonment of a maternity den, even if short-term, could reduce cub survival. In addition, polar bears encountered along seismic survey lines may be killed in defense of life and property, although regulatory agencies and the oil and gas industry have made serious efforts to minimize interactions with polar bears (NRC 2003a). However, companies are required to search for dens prior to the onset of work and are also required to maintain a 1-mile buffer around the dens, which, so far, appears to be an effective mitigation measure.

For more information on potential effects to marine mammals from seismic exploration, see the MMS Programmatic Environmental Assessment for Arctic Ocean Outer Continental Shelf Seismic Surveys (MMS 2006c). In summary, seismic noise can alter ambient noise levels, damage marine mammal hearing structures, and cause direct physical injury to marine mammals. Potential effects caused by these stressors include:

- Temporary increased susceptibility to injury, mortality, or predation due to noise masking (e.g., communication, predator avoidance);

- Temporary disturbance of normal behavior;

- Temporary avoidance of habitat;
- Increased susceptibility to injury, mortality, or predation due to hearing loss; and
- Reduced survival due to physical injury.

Construction of Offshore Platforms and Pipelines. As part of the proposed action, 6 to 16 exploration wells and 40 to 120 production wells will be drilled in the Beaufort Sea, while 1 to 20 exploration wells and 60 to 280 production wells will be drilled in the Chukchi Sea. There will also be 1 to 4 platforms in the Beaufort Sea and 1 to 5 platforms in the Chukchi Sea. Additional offshore activities planned as part of the proposed action include 10 subsea production wells and 48 to 217 km (30 to 135 mi) of new offshore pipeline in the Beaufort Sea, and between 18 and 82 subsea production wells and 40 to 402 km (25 to 250 mi) of new offshore pipeline in the Chukchi Sea (Table 4.4.1-4).

Noise and human activity associated with construction of offshore facilities and pipelines could disturb marine mammals that may be present in the vicinity of the construction site. Construction activities could disturb normal behaviors (e.g., feeding, social interactions), mask calls from conspecifics, disrupt echolocation capabilities, and mask sounds generated by predators or prey. Generally, the immediate response of disturbed individuals is to leave or avoid the construction area. From a behavioral perspective, increased anthropogenic noise could interfere with communication among cetaceans, such as gray, minke, beluga, and killer whales and harbor porpoise, mask important natural and conspecific sounds, or alter natural behaviors (i.e., displacement from migration routes or feeding areas, disruption of feeding or nursing). Behavioral impacts appear to be affected by the animal's sex and reproductive status, age, accumulated hearing damage, type of activity engaged in at the time, group size, and/or whether the animal has heard the sound previously (e.g., Olesiuk et al. 1995; Richardson et al. 1995a; Kraus et al. 1997; National Research Council 2003a, 2005a). Toothed whales can be particularly sensitive to high-frequency sounds given their use of high-frequency sound pulses in echolocation, and moderately high-frequency calls for communication. Baleen whales, a group including gray and minke whales, are similarly sensitive to the low frequency noise that is often characteristic of construction, machinery operation, vessel noise, and aircraft noise. Bowhead whales stop feeding and move from within 0.8 km (0.5 mi) of experimental dredge sounds to more than 2 km (1.2 mi) away (MMS 2002a). In addition, some individuals may habituate to dredging and other construction activities (MMS 2002a). Because some marine mammal species exhibit seasonal changes in distribution and are absent or infrequent in the Beaufort and Chukchi Sea Planning Areas in winter, winter construction of offshore platforms would affect relatively few animals. In spring and summer, species present in construction area would be expected to leave the area to other habitats. Displacement could be of short- or long-term duration and could affect survival of young if adults abandon young or are displaced from important foraging areas as well as adults if they are kept from their feeding areas for a long period of time. The construction of new infrastructure in polar bear habitat has the potential to adversely impact these animals through disturbance and displacement.

To date, documented impacts to polar bears in Alaska by oil and gas development activities are few. The potential for adverse impacts is largely associated with increases in industrial activity or expansion of industrial footprints, as well as related increases in human/polar bear interactions. Minimal impacts could result from the potential increase in human/polar bear interactions associated with expanding the onshore facility, installing the offshore and onshore pipelines, and extending the production timeframe within the action area. The FWS and USGS have predicted that polar bears may be extirpated throughout much of their range within the next 40 to 75 yr if current trends in sea ice reduction continue (73 FR 28212 [15 May 2008]). Nonetheless, impacts to bears as a direct result of routine, OCS-related oil and gas activities appear to be minimal.

Any activity causing noise reaching 160 re 1 μPa would risk level B harassment take of whales, and require a take authorization under the MMPA. Additional mitigation measures required to avoid significant adverse impacts would be required by later BOEM and NMFS review processes. Detailed analysis of potential Exploration Plans and Development & Production Plans, along with mitigation measures incorporated into any necessary Incidental Take Authorizations (ITA), would further reduce the potential for any significant adverse impacts. Overall, while development activities may impact whales through masking and avoidance, significant impacts are not expected. Such effects would likely be limited to individuals or small groups, be limited in duration to the construction period, and be sublethal.

Pipeline trenching may also disrupt mammal species (e.g., Pacific walrus, gray whale, bowhead whale). Despite the long, linear nature of pipelines, their construction is a slow-moving, relatively stationary operation. Thus, pipeline construction represents a temporary and avoidable source of disturbance. The extent to which benthic food sources are affected and the subsequent impact to marine mammals depend on the type and amount of benthic habitat that would be permanently disturbed by trenching, the importance of the specific habitats in providing food resources to marine mammals, and the marine mammal species and numbers of individuals that could be affected.

Pipeline construction could cross barrier island and nearshore coastal habitats. Polar bears may be temporarily displaced, or their behavior modified (e.g., by changing direction or speed of travel), by construction activities. As explained in a recent biological opinion, "disturbance from stationary activities could elicit several different responses in polar bears. Noise may act as a deterrent to bears entering the area, or conversely, it could attract bears. Bears attracted to development facilities may result in human–bear encounters, leading to unintentional harassment, or intentional hazing of the bear" (USFWS 2009). Mitigation measures (such as implementation of a human-bear conflict management plan) generally required under MMPA Incidental Take Authorizations (typically a Letter of Authorization) would reduce the potential for these impacts. Any adverse impacts would be localized and negligible.

Because no more than 13.5 ha (33.4 ac) of bottom area would be disturbed by platform construction and no more than 567 ha (1,401 ac) of bottom area would be disturbed by pipeline construction under the proposed action (Table 4.4.1-4), relatively little benthic habitat would be disturbed compared to that present in the Beaufort and Chukchi Sea Planning Areas. Natural

recovery of the disturbed benthic habitats would occur within 3 to 10 yr of initial disturbance (Section 4.4.6.2.3). Pipeline trenching is expected to have a limited effect on the overall availability of food sources for marine mammals. Impacts to marine mammal food sources would be localized and would not result in population-level impacts. To avoid or minimize adverse impacts, relevant organizations (i.e., project proponents, BOEMRE, NMFS) will need to develop timing guidelines and operational protocols to govern the specifics of this project. This review would take place at a later stage of review, when more site-specific information would be known.

Construction of Onshore Pipelines. Under the proposed action, 16 to 129 km (10 to 80 mi) of new pipelines onshore of the Beaufort Sea will occur, causing up to 584 ha (1,443 ac) of soil disturbance (Table 4.4.1-4). No other onshore construction will occur under the proposed action (Section 4.4.1.3). Onshore construction activities would not affect most of the marine mammals in the Arctic region because these species typically occur in offshore open-water habitats and ice floes and along pack ice away from coastal areas where construction might occur. Individuals that might be present in nearshore waters adjacent to a construction area would leave the area. Onshore pipeline construction has the potential to directly affect pinnipeds and fissipeds and their habitats through impacts associated with direct contact with construction equipment or infrastructure, as well as indirect impacts associated with perceived habitat loss. Most pinnipeds and fissipeds are alert and mobile enough to be able to avoid areas where construction is occurring. Juveniles are smaller and less mobile than adults; therefore, human disturbances associated with construction activities may have a greater effect on younger pinniped and fissiped individuals.

The activities associated with onshore construction may also indirectly affect pinniped and fissiped species by reducing habitat quality, and thereby affecting the distribution of the species. Pinnipeds and fissipeds may avoid certain areas of human disturbance. Polar bears may be affected by oil and gas development by abandoning dens in close proximity to onshore disturbances, which may lead to range conflicts with other polar bears or greater cub mortality (Amstrup 1993; Linnell 2000). However, there is evidence that some species or individuals of pinnipeds and fissipeds may be capable of habituating to moderate levels of oil and gas exploration and development activities (Moulton et al. 2003; Blackwell et al. 2004; Smith et al. 2007).

The spotted seal, Pacific walrus, and polar bear are the three species of marine mammals in the Beaufort and Chukchi Sea Planning Areas likely to occur in coastal habitats, and therefore to be affected by onshore construction. The spotted seal uses coastal habitats such as beaches and river delta sandbars for sunning and resting, while the polar bear forages along shore ice locations, and may have onshore maternity dens located as much as 8 to 10 km (5 to 6 mi) inland of the coast (Section 3.6.4.2.1). Walrus also haul out in large numbers along the Chukchi Sea Coast and beluga use the near shore areas, such as Kaseguluk Lagoon, in the spring. Foraging bears and resting seals would probably leave or avoid areas where onshore construction is occurring. If an active maternity den is present at or near the construction site, construction may cause the female to abandon the den and her cubs, potentially decreasing cub survival (Linnell et al. 2000); however, there is evidence that denning polar bears can become tolerant of low levels of human activity (Amstrup 1993). This was also recently seen (2011) when a sow

with cubs denned on Spy Island next to an offshore facility. As only a small number of individuals of either species might be disturbed, no population-level effects are expected.

Given the small amount of onshore construction that could occur under the proposed action, it is unlikely that onshore construction would have long-term impacts to pinniped and fissiped populations. Onshore construction activities would be sited to avoid areas of known sensitive habitats (e.g., polar bear dens), minimizing the potential for affecting pinniped and fissiped populations.

Operations of Offshore and Onshore Facilities. Noise associated with OCS drilling and production is of relatively low frequency, typically between 4.5 and 30 Hz (Richardson et al. 1995). Potential effects on marine mammals may include disturbance (e.g., changes in behavior, short- or long-term displacement) and masking of calls from conspecifics or other natural sounds (e.g., surf, predators).

Because odontocetes use sounds at frequencies that are generally higher than the dominant sounds generated by offshore drilling and production activities, they may not be sensitive to or affected by these sounds. In contrast, mysticetes (the minke, gray, humpback, fin and bowhead whales) are considered to have good low-frequency hearing and exhibit vocalizations at low frequencies, and thus may be affected by drilling and production noise. Effects would be similar to those identified for exploration and construction activities, namely, behavioral disruption and avoidance of or displacement from the immediate vicinity of the operating facility. For example, bowhead whales have been observed to deflect from their migratory path by 20 km (12 mi) or more in response to drilling noises (MMS 2002a). However, bowhead whales tolerate high levels of continuous drilling noise when necessary to continue with migration (MMS 2002a).

Avoidance or displacement can be of short- or long-term duration, depending on whether or not affected individuals may become acclimated to the operational activities. Because affected individuals would most likely leave the area for other appropriate habitats, neither behavioral disturbance nor the displacement of individuals by normal operations would be expected to result in long-term effects to either individuals or populations. The presence of an operating onshore facility could reduce the suitability of some areas for use by denning female polar bears, while normal operations of offshore facilities could decrease the suitability of offshore areas as pinniped foraging or pup-rearing habitats. Exposure events that elicit a response also may induce stress and further energy expenditure. The frequency that an individual is exposed and reacts to noise levels throughout a given season or lifetime can reach thresholds whereby individual health or reproductive performance could be adversely affected.

Under the Final Rule designating critical habitat for polar bears, terrestrial denning habitat (Critical Habitat Unit 2) was not designated along the U.S. Chukchi Sea coastline (75 FR 76086 [Dec. 7, 2010]). In the Bering and Chukchi Seas, the majority of dens that have been documented occur on Wrangel and Herald islands, and on the Chukotka Peninsula in Russia. In recent years, sea ice formation along the coastline is occurring later in winter, which may preclude access to coastal denning areas along the U.S. Chukchi Sea coastline. While the USFWS has determined that the coastlines of the Chukchi and Bering Seas are not critical

habitat, some dens may occur along the coast. Disturbance at den sites from construction or other human activities could result in a female with cubs abandoning the den site, resulting in death from hypothermia or predation to the cubs. Should construction activities be proposed near an active den, mitigation measures (such as den detection and avoidance) generally required under the Letter of Authorization would reduce the potential for these impacts. The raised onshore pipeline would not pose a physical barrier to polar bear movement, and once away from the coast, would not be in polar bear habitat.

Discharges and Wastes. Table 4.4.1-4 presents information on drilling fluids, drill cuttings, and produced waters discharged offshore as a result of the proposed action in the Beaufort and Chukchi Seas. Figure 4.4.7-4 (Section 4.4.7.1.1) presents a conceptual model for potential effects of operational waste discharges on marine mammals. Produced water, drilling muds, and drill cuttings will be discharged into offshore marine waters in compliance with applicable regulations and permits. Compliance with regulations and permits will limit the exposure of marine mammals to waste discharges. In some cases, drilling muds may be recycled and not discharged and cuttings may be transported offsite.

Up to 500 bbl of drill fluids and 600 tons of drill cuttings will be discharged at each exploration and delineation well (Table 4.4.1-4). Heavier components of these muds and cuttings (such as rock) would settle to the bottom, while lighter components could increase turbidity around the drill site. While this increased turbidity could cause marine mammals to avoid the area, any increase in suspended solids associated with the discharge of drilling wastes would be rapidly diluted and dispersed, and thus not be expected to adversely affect marine mammals in the area. Drilling fluids and cuttings associated with development and production wells would be treated and disposed of in the wells; therefore, negligible impacts to marine mammals from these wastes are expected.

Some marine mammals may be exposed to waste fluids (such as bilge water) generated by and discharged from OCS vessels. Discharges of such wastes from OCS service and construction vessels, if allowed, would be regulated under applicable NPDES permits and would also be rapidly diluted and dispersed. Sanitary and domestic wastes would be processed through shipboard waste treatment facilities before being discharged overboard, and deck drainage would also be processed shipboard to remove oil before being discharged. Thus, permitted waste discharges from OCS service and construction vessels would not affect marine mammals.

Ingestion or entanglement with solid debris can adversely impact marine mammals (Marine Mammal Commission 2004). Mammals that have ingested debris, such as plastic, may experience intestinal blockage which, in turn, may lead to starvation, while toxic substances present in the ingested materials (especially in plastics) could lead to a variety of lethal and sublethal toxic effects. Entanglement in plastic debris can result in reduced mobility, starvation, exhaustion, drowning, and constriction of, and subsequent damage to, limbs caused by tightening of the entangling material. The discharge or disposal of solid debris into offshore waters from OCS structures and vessels is prohibited by the BOEM (30 CFR 250.40) and the USCG (MARPOL, Annex V, Public Law 100-220 [101 Statute 1458]). Thus, entanglement in or ingestion of OCS-related trash and debris by marine mammals would not be expected under the proposed action during normal operations.

Vessel and Aircraft Traffic. There would be up to 12 surface vessels and 12 helicopter trips per week in the Beaufort Sea and up to 15 surface vessels and 15 helicopter trips per week in the Chukchi Sea under the proposed action (Table 4.4.1-4). The majority of vessel traffic in the Beaufort and Chukchi Seas primarily occurs during summer, at which time it could contribute to ambient noise and potential disturbance to marine mammals (MMS 2002a). Which species could be affected by vessel and aircraft traffic, the nature of their response, and the potential consequences of the disturbance, will be a function of a variety of factors, including the specific routes, the number of trips per day, the altitude of the aircraft overflights, the seasonal habitats along the routes, the species using the habitats and the level of their use, and the sensitivity of the mammals to vessel and aircraft traffic. Traffic over heavily used feeding or calving habitats could result in population-level effects for some species, while impacts from traffic over other areas with less sensitive species would likely be limited to a few individuals and not result in population-level effects.

Marine mammals may be affected by this traffic either by disturbance from passing vessels or helicopters or by direct collisions with vessels. Among the cetaceans, the beluga, gray, and bowhead whales are the most abundant in the Beaufort and Chukchi Sea Planning Areas. Thus, these species have the potential to encounter OCS-related vessels. The other cetaceans are present in relatively low numbers (e.g., less than 2,000 throughout the entire planning area), and thus are less likely to encounter OCS-related vessels. During their spring migration (April through June), bowhead whales would likely encounter few, if any, vessels along their migration route, as NMFS (in their IHAs) and FWS (in their LOAs) restrict access to the Chukchi Sea to protect animals in the spring lead system.

Bowheads react to the approach of vessels at greater distances than they react to most other industrial activities. According to Richardson and Malme (1993), most bowheads begin to swim rapidly away when vessels approach rapidly and directly. This avoidance may be related to the historic commercial and continuing subsistence hunting. Avoidance usually begins when a rapidly approaching vessel is 1–4 km (0.62–2.5 mi) away. A few whales may react at distances from 5–7 km (3–4 mi), and a few whales may not react until the vessel is <1 km (<0.62 mi) away. Received noise levels as low as 84 dB re 1 μPa (decibels relative to one micropascal) or 6 dB above ambient may result in strong avoidance of an approaching vessel at a distance of 4 km (2.5 mi) (Richardson and Malme 1993). Vessel disturbance has been known to disrupt activities and social groups. Fleeing from a vessel generally stopped within minutes after the vessel passed, but scattering may persist for a longer period. Parks et al. (2011) note for North Atlantic right whales (a species similar to bowhead whales) and Holt and Noren (2008) note for killer whales that individuals modified calls in response to increased background and vessel noise, respectively, by increasing the amplitude of their calls. McDonald, Hildebrand, and Mesnick (2009), however, noted the decline in blue whale song tonal frequencies was not fully explained by the hypothesis of increasing ocean noise. But these authors suggest that post whaling population increase is altering sexually selected trade-offs for singing males between song intensity (ability to be heard at a greater distance) and song frequency (ability to produce songs of lower pitch).

Where vessels approach slowly or indirectly, bowheads are much more tolerant, and reactions are generally less dramatic. The encounter rate of bowhead, humpback, and fin whales

with vessels associated with natural gas development would depend on the location of the platform in relation to both shipping routes and areas of heavy use. During their spring migration (April through June), bowheads likely would encounter few, if any, vessels along their migration route, because ice at this time of year typically would be too thick for supply vessels to operate in. Bowheads, as with other "right whales" (family Balaenidae), are among the slowest moving of whales, which may make them particularly susceptible to ship strikes. Despite their likely greatest susceptibility to vessel strikes, records of strikes on bowheads are rare compared with records of strikes on some other large whales (Laist et al. 2001). About 1% of the bowhead whales taken by Alaskan Iñupiat bore scars from ship strikes (George et al. 1994). Until recently, few large ships have passed through most of the Western Arctic bowhead's range but this situation is changing and the potential for increasing opportunity for vessel strikes may be increasing as northern sea routes become more navigable with the decline in sea ice. At present, bowheads, humpback, and fin whales probably would adjust their individual swimming paths to avoid approaching within several kilometers of vessels attending the production platform, and would also move away from vessels that approached them within a few kilometers (Richardson et al. 1995).

Worldwide, at least 11 species of cetaceans have been documented as being hit by ships (Laist et al. 2001; Jensen and Silber 2003). In most cases, the whales are not seen beforehand or are seen too late to avoid collision. Most lethal or severe injuries involve ships traveling ≥14 knots (26 km/hr or 16 mph) or faster, and collisions with vessels greater than 80 m (262 ft) in length are usually either lethal or result in severe injuries (Laist et al. 2001). Most seismic vessels typically operate around 4–5 knots. Gray whale use of shallow coastal habitat during migration makes ship strikes a potential source of mortality. Only one ship strike mortality has been reported in Alaska when a killer whale hit the prop during a groundfish trawl in the Bering Sea (MMS 2008b; Allen and Angliss 2011), however, to-date, there have been no vessel strikes reported in the Arctic. Although, harvested bowhead whales have had scarring, indicating they had been hit by the prop of a ship (Rosa 2008). Pinnipeds may also be struck by vessels. There is a possible, but unlikely, potential for polar bears to be struck by vessels (MMS 2009a).

In addition to possible collision-related injuries, cetaceans may be disturbed by the observation of the vessel and the noise it generates. Disturbed individuals would be expected to cease their normal behaviors and likely move away from the vessel. Following passage of the vessel, affected individuals may return and resume normal behaviors. However, if vessel traffic occurs along a consistent route, some species may permanently leave the area. If the abandoned areas represent important feeding or calving areas, physical condition and reproductive success may be adversely affected. Of 236 bowhead whales examined between 1976 and 1992, only three ship-strike injuries were documented, indicating that they do not often encounter vessels, avoid interactions with vessels, or that interactions usually result in the death of the animals (Shelden and Rugh 1995; Rosa 2008). Current rates of vessel strikes of bowheads are low, and there are no known fin or humpback strikes in the Alaskan Arctic (BOEMRE 2010e). Bowhead whales do not seem to react to aircraft overflights at altitudes above 300 m (984 ft). Most bowheads do not deflect more than a few kilometers from a single noise disturbance, and behavioral responses last only a few minutes. Most reactions include a change in migration speed and swimming direction to avoid the sound source (Richardson et al. 1991). Bowhead whales typically avoid vessels at distances ranging from 1 to 4 km (0.6 to 2.5 mi); drilling noise

may deflect individuals 20 km (12.4 mi) or more from their migratory paths. Schick and Urban (2000) suggest that the spatial pattern of bowhead distribution is highly correlated with distance from drilling rigs, and the presence of drilling rigs results in a temporary loss of available habitat. Miles et al. (1987) suggest icebreakers pushing ice would cause half of the bowheads within 4.6 to 20 km (2.9 to 12.4 mi) of the source to demonstrate an avoidance behavior. Beluga whales are also known to avoid ice breakers by long distances (Erbe 1997, 2000; Cosens 2003).

Fixed wing aircraft may serve as whale spotters during pipeline route surveys or pipeline installation activities in the nearshore areas. The use of spotter aircraft could be an important mitigation technique that would reduce the overall potential for gas development to cause adverse impacts to whales. Helicopters are likely to be used to transport crews and supplies in support of modification of the production platform for gas development. Aircraft noise may elicit a response, such as a turn or hasty dive, from a whale or group of whales. But given the altitude at which these aircraft are expected to fly, the potential for adverse reactions is small. Any impacts that did occur would be temporary and minor. To avoid potential disturbance effects on marine mammals, aircraft maintain minimum flight altitudes — human safety will take precedence at all times over this recommendation.

Construction- and operation-related noises that have the greatest potential to impact pinnipeds, including those generated from vessel and aircraft traffic. Noises emitted by shipping vessels range between 140 dB re 1 μPa for smaller vessels to 198 dB re 1 μPa for larger tankers and cargo ships (Heathershaw et al. 2001; Erbe 2002; Hildebrand 2004). Helicopters flying at 150 m (492 ft) altitude are expected to emit noises received at ground level of approximately 80 to 86 dB re 20 μPa (Born et al. 1999). These noises may impact nearby pinniped species, which typically have in-air hearing thresholds between 20 to 80 dB and underwater hearing thresholds between 60 to 120 dB (Kastak and Schusterman 1998; NRC 2005). Noises associated with approaching vessels and helicopters may cause hauled out pinnipeds to flee to aquatic habitats. Fay et al. (1984) observed Pacific walruses diving into the water from pack ice when approached by a helicopter within 400 to 600 m (1,300 to 1,968 ft) upwind and 1,000 to 1,800 m (3,280 to 5,905 ft) downwind. Ringed, spotted, and bearded seals have also been known to avoid approaching vessels by fleeing from haul out sites into the water (Frost et al. 1993; Born et al. 1999; Burns and Frost 1999; COSEWIC 2003). During pinniped flight reactions, young pups could be trampled or become isolated from their mothers, leading to injury or making them more susceptible to predators. Despite this, there is evidence that pinnipeds may habituate to moderate levels of human activity (Moulton et al. 2003; Blackwell et al. 2004); therefore, the impacts to pinnipeds from operational noises are expected to be either negligible or minor depending on the species affected.

Vessel traffic may disturb pinnipeds in the water and hauled out on ice or terrestrial habitats. Hauled out pinnipeds may exhibit behavioral reactions to the physical disturbance of an approaching vessel or aircraft (sometimes >1 km [0.6 mi] away) by exhibiting startle reactions, escaping the immediate area into the water. Project aircraft has the greatest potential to adversely affect pinnipeds haul out and rookery sites (Frost et al. 1993), where disturbed adults may temporarily cease normal behaviors (such as feeding of young), leave the rookery site, and thereby increase predation risks of unattended pups, or risk of trampling while adults are fleeing. However, pinnipeds may habituate to the presence of project vessels (Moulton et al. 2003;

Blackwell et al. 2004), and the escape reactions of hauled out pinnipeds may be minimized over time. At times, many of these species, such as seals, are attracted to moving vessels. Pinnipeds could be injured or killed by ship collisions.

Vessel traffic associated with icebreaking activities in the Alaskan OCS may alter the behaviors of walruses at greater distances (sometimes >2 km [1.2 mi] away) than ordinary ship traffic (Fay et al. 1984). In response to icebreaking vessels, female and young walruses typically react more than males do. Hauled out females and young typically responded to approaching icebreaking vessels by fleeing into the water at distances of 0.5 to 1 km (0.3 to 0.6 mi); males responded by entering the water at distances of 0.1 to 0.3 km (0.06 to 0.2 mi) (Brueggeman et al. 1991; Johnson et al. 1988).

Vessel and aircraft traffic may disturb fissipeds in aquatic and terrestrial habitats. It is unlikely for polar bears to be directly impacted by vessel collisions; instead, impacts to polar bears from vessel and aircraft traffic may occur from the physical disturbance associated with such activities. Fissipeds are generally considered to be more tolerant than other marine mammals to noises associated with the construction of offshore oil and gas platforms (MMS 2007d). However, construction-related noises may still affect fissiped populations. Vessel, terrestrial vehicle, and aircraft activities can affect polar bear behavior. Vessel traffic associated with natural gas development activity is not expected to cause impacts to polar bears, because they show little reaction to vessels and generally do not linger in open water where vessels are more likely to travel. As explained in a Biological Opinion (USFWS 2009), "During the open-water season, most polar bears remain offshore on the pack ice. Barges and vessels transporting materials for construction and on-going operations of facilities usually travel in open-water and avoid large ice floes. Therefore, there is some spatial separation between vessels and polar bears." If there is an encounter between a vessel and a bear, it would most likely result in short-term behavioral disturbance only. Polar bear responses to vessels are brief, and generally include walking toward, stopping and watching, and walking/swimming away from the vessel.

Polar bears typically flee from low flying aircraft that are at an altitude of <200 m (656 ft) and a lateral distance of <400 m (1,312 ft) (Shideler 1993). Extensive or repeated overflights by helicopters travelling to and from offshore facilities could disturb polar bears. Polar bears have been known to run from other sources of noise and the sight of aircraft, especially helicopters. According to a Biological Opinion (USFWS 2009), "Behavioral reactions of polar bears would likely be limited to short-term changes in behavior and have no long-term impact on individuals. In addition, [BOEMRE] requires these types of flights to operate at an altitude of >1,500 ft AGL where possible, which would significantly reduce disturbance." It is expected that flight altitude requirements will minimize disturbances and that adverse impacts from this activity will be temporary and minimal.

The effects of air traffic on pinnipeds in the action area are expected to be localized and transient. Some seals may be disturbed on the ice or at haulouts on land and enter the water, although their responses may be highly variable and brief in nature (Born et al. 1999; Boveng et al. 2008, 2009; Burns and Harbo 1972; Cameron et al. 2010; Kelly et al. 2010). Mitigation measures prohibiting aircraft overflights below 457 m (1,500 ft) will lessen aircraft

impacts to these pinnipeds. Results from studies of an existing facility (specifically, the Northstar development) are roughly analogous to what is contemplated under the present natural gas development scenario and suggest that any adverse impacts to phocids would be minor, short-term, and localized, with no measurable consequences to seal populations.

Pacific walrus are particularly vulnerable to disturbance events given their tendency to aggregate in large groups. Reactions to disturbances when on ice are highly variable (Richardson et al. 1995a). Reactions at group haulouts (on land) are more consistent; walrus will flee haulout locations in response to disturbance from aircraft and ship traffic, though walrus in the water are thought to be more tolerant. Females with dependent young are considered the least tolerant of disturbances. Walrus are particularly sensitive to helicopters and changes in engine noise, and are more likely to stampede when aircraft turn or bank overhead. Disturbances caused by vessel and air traffic may cause walrus groups to abandon land or ice haulouts. Severe disturbance events could result in trampling injuries or cow-calf separations, both of which are potentially fatal. But while adverse impacts can be severe, they are also to a large extent avoidable. The USFWS has concluded that a minimum altitude of 1000 ft ASL is sufficient in sea ice habitats (see p. 24 of the USFWS Chukchi Sea EA, 2008) with a 0.5-mi (80-m) horizontal buffer. BOEMRE has taken the more precautionary approach of a 1-mi horizontal buffer and 1500-ft AGL or ASL based in part on industry data and on unpublished ADFG and USFWS haulout monitoring data. While BOEMRE does not regulate air space within the project area, direct overflights of terrestrial or sea ice walrus haulouts by industry are strongly discouraged. Typical mitigation measures include flight corridors, a minimum of 1 to 2 mi inland and directly from shore to the exploration site, while maintaining a minimum of 1 horizontal mi from groups of walrus hauled out on ice or land. Overall, the potential for adverse impacts to individuals or groups of walrus do exist, but the probability is minimal in light of mitigation techniques, such as minimum altitude requirements for aircraft. Impacts to walrus are expected to be minor.

Decommissioning. Under the proposed action, no platforms will be removed with explosives from the Beaufort and Chukchi Sea Planning Areas. Therefore, potential impacts of decommissioning on marine mammals, as summarized in Figure 4.4.7-4 (Section 4.4.7.1.1), will not occur.

Accidents. Accidental oil spills could occur in the Beaufort and Chukchi Sea Planning Areas under the proposed action (Section 4.4.2). Table 4.4.2-1 presents the oil spill assumptions for the proposed action; while Figure 4.4.7-5 (Section 4.4.7.1.1) presents a conceptual model for potential effects of oil spills on marine mammals. Small oil spills (≤1,000 bbl) break up and dissipate within hours to a day (MMS 2009a). Large spills, particularly those that continue to flow for extended periods (i.e., days, weeks, or months), pose an increased likelihood of impacting marine mammal populations (MMS 2008b). Operational discharges such as tank washing with seawater, oil content in ballast water, and fuel oil sludge are among the sources of small oil spills from tankers (Jernelöv 2010). Large oil spills from tankers have decreased significantly in recent years while spills from ageing, ill-maintained, or sabotaged pipelines have increased.

Oil spills could affect marine mammals in a number of ways, and the magnitude and severity of potential impacts would depend on the location and size of the spill, the type of

product spilled, weather conditions, the water quality and environmental conditions at the time of the spill, and the species and habitats exposed to the spill. Marine mammals may be exposed to spilled oil by direct contact, inhalation, and ingestion (directly, or indirectly through the consumption of contaminated prey species). Such exposures may result in a variety of lethal and sublethal effects (Geraci 1990).

Fresh crude oil releases toxic vapors that when inhaled may irritate or damage respiratory membranes, congest lungs, and cause pneumonia. Following inhalation, volatile hydrocarbons may be absorbed into the bloodstream and accumulate in the brain and liver, leading to neurological disorders and liver damage (Geraci and St. Aubin 1982; Geraci 1990). Toxic vapor concentrations may occur just above the surface of a fresh oil spill, and thus be available for inhalation by surfacing cetaceans. Inhalation would be a threat only during the first few hours after a spill (Hayes et al. 1992; ADNR 1999). Prolonged exposure to freshly spilled oil could kill some whales (including bowheads, pinnipeds, and polar bear), but the numbers would be small due to a low chance of such contact. This would most likely occur if oil spilled into a lead that bowhead whales could not escape (MMS 2001).

Direct contact of oil may irritate, inflame, or damage skin and sensitive tissues (such as eyes and other mucous membranes) (Geraci and St. Aubin 1982). Prolonged contact to petroleum products may reduce food intake; foul baleen on mysticete whales, elicit agitated behavior; alter blood parameters, respiration rates, and gas exchange; and depress nervous functions (Lukina et al. 1996). Under less extreme exposures (lower concentrations or shorter durations), oil does not appear to readily adhere to or be absorbed through cetacean skin, which, due to a thick fat layer, may provide a barrier to the uptake of oil-related aromatic hydrocarbons through the body surface (Geraci and St. Aubin 1982, 1985; Harvey and Dahlheim 1994).

Effects of oil spills would depend on how many whales contacted oil, the duration of contact, and the age/degree of weathering of the spilled oil. The number of whales contacting spilled oil would depend on the size, timing, and duration of the spill; how many whales were near the spill; the whales' inclination or ability to avoid contact; and the effectiveness of cleanup activities (MMS 2001, 2004c). Some displacement of bowhead whales may occur in the event of a large oil spill, and avoidance of the contaminated area may last for several years (MMS 2001; NMFS 2001b). This indicates that bowhead whales may have some ability to detect an oil spill and would avoid surfacing in the oil by detouring away from the spill area (NMFS 2001b). Modeling efforts have indicated that only up to 2% of the Beaufort Sea bowhead whale population would be affected by a large oil spill (NMFS 2001b).

An oil spill into ice leads or polynyas in the spring could have devastating effects, trapping bowhead whales where they may encounter fresh crude oil. Calves would be more vulnerable than adults because they need to surface more often to breathe. Feeding bowhead whales are also sometimes observed aggregating in large numbers during the summer open-water season, when they could also be vulnerable to a spill. Beluga whales, that also use the spring lead system to migrate, would be susceptible to a spill that concentrates in these leads (Nuka Research and Planning Group, LLC and Pearson Consulting, LLC 2010).

Pinnipeds and fissipeds may be exposed while coming ashore onto oiled beaches. In addition, adults and juveniles may also be indirectly affected if an accidental spill reduces the quality or quantity of foraging or breeding habitats. Impacts to calving grounds could result in population-level effects. Fouling of fur of some species (e.g., ringed seal pups, polar bear cubs) could affect thermoregulation and reduce survival of the affected young. Ice seals tend to be solitary and would most likely be exposed to oil at sea or on ice. Walrus and spotted seals would most likely be exposed at sea, on ice, or at coastal haulouts. Polar bears would most likely come into contact with spilled oil at sea, on ice, or on shore.

Oil would affect pinnipeds if it were to directly contact individuals, haulouts, or major prey species. For example, bearded seals and walrus are vulnerable to spilled oil from direct exposure and from the indirect effects through the benthic organisms on which they feed (Cameron and Boveng 2009). Although some adult pinnipeds (e.g., walruses) have thick skin that would protect them from absorption of oil, direct contact with oil would affect sensitive tissue areas, causing irritation to eyes, nasal passages, and lungs. Inhalation of hydrocarbon vapors may damage or irritate lung tissue. These injuries may affect already stressed adults and could lead to some fatalities. While adult ice seals depend on a thick fat layer for insulation, seal pups rely on a dense layer of underfur until they are several weeks old. The fouling of this underfur in young pups could reduce its insulating properties, increasing the potential for hypothermia and increasing pup mortality. While there is no conclusive evidence of past oil spills causing a decline in prey species sufficient to result in a decline in any marine mammal population, there is still the possibility of such an effect occurring. Because pinniped species in the Arctic do not congregate in rookeries, the overall effects of accidental oil spills on pinnipeds will be species-specific.

An oil spill that contacts an aggregation of walruses or displaces them from their haulouts may have a severe impact on the population. Walruses could also be impacted by consuming contaminated molluscs and being exposed to oil residues in sediments. As they have a long life span, they could suffer severe effects from the bioaccumulation of oil-derived contaminants (Nuka Research and Planning Group, LLC and Pearson Consulting, LLC 2010). According to Geraci and St. Aubin (1990), ice seals have the ability to metabolize oil if ingested in low amounts and some researchers believe walrus may share this ability (GarlichMiller, Pers. Comm.).

Accidental oil spills could potentially affect polar bears through contamination of prey or reduction of prey availability, fouling of fur, and oiling of ice. Polar bears are very sensitive to oil contact (Engelhardt 1981). Fouling of fur greatly reduces its ability to insulate, and can result in hypothermia and death. Direct contact with oil or secondary contact with contaminated ice could be fatal. However, in most areas, polar bears occur at low densities; therefore, small numbers of bears would be affected by a single spill. Multiple spills or spills along the ice edge where bear density is greater would potentially increase mortality rate. Ringed seals are the primary prey of polar bears and are, therefore, directly linked to their survival. If seal density is affected by oil spills or cleanup operations, polar bears could experience increased stress and possibly lower survivorship.

Marine mammals may incidentally ingest floating or submerged oil or tar, and may consume oil-contaminated prey (Geraci 1990). Spilled oil may also foul the baleen fibers of mysticete whales, temporarily impairing food-gathering efficiency or resulting in the ingestion of oil or oil-contaminated prey (Geraci and St. Aubin 1987). Ingested oil can remain within the gastrointestinal tract and be absorbed into the bloodstream, thus irritating and/or destroying epithelial cells in the stomach and intestine. Oil ingested during grooming of fouled fur has been reported to result in liver and kidney damage in polar bears and ringed seals (NRC 2003a; Oritsland et al. 1981). It should be noted that ringed seals and likely other ice seals can detoxify their bodies by renal and bilary pathways. Further, seals do not typically orally groom themselves and are therefore less likely to ingest toxins in that way (Kooyman et al. 1976; Geraci and Smith 1976).

An accidental oil spill may result in the localized reduction, extirpation, or contamination of prey species. Invertebrate and vertebrate species (such as zooplankton, crustaceans, mollusks, and fishes) may become contaminated and subsequently expose marine mammals that feed on these species.

Depending on their habitat preferences, feeding styles, and migration patterns, some species may be more vulnerable to exposure than other species. Spills occurring in spring may affect a greater number of individuals due to animals congregating during migration. Spills occurring in or reaching coastal areas, especially sheltered coastal habitats such as bays and estuaries, would be more likely to affect species such as the beluga whale and spotted seal that use coastal habitats for calving and resting. Bowheads are most sensitive to oil contamination during the spring migration when calves are present and their movements are restricted to open leads in the ice (MMS 2002a).

Polar bears may be directly affected by an oil spill, since they spend the majority of their time on ice, through oiling of fur, ingestion of oil from grooming, or by feeding on oiled prey or carcasses. Large oil spills could have a significant impact on polar bear habitat and can result in food chain effects. Spills associated with onshore facilities (and especially any onshore pipelines) would potentially affect polar bears. While it is unlikely that a bear would be directly exposed to an accidental pipeline release, bears could be affected by feeding on contaminated prey. However, because of the relatively low density of bears in the Arctic region, no more than a few individuals would be expected to be affected by an onshore release. Onshore spills that enter a stream system may be carried to coastal areas, where other marine mammals may be exposed.

Because benthic organisms (such as crustaceans and mollusks) accumulate oil compounds more readily and to higher levels than pelagic biota, the potential for ingesting oil-contaminated prey is highest for benthic feeding species, such as the gray whale, less so for zooplankton-feeding cetaceans, and least for fish-eating cetaceans (Würsig 1990). Similar differences in exposure via food ingestion may be expected among benthic and fish-eating pinnipeds (i.e., Pacific walrus, spotted seals). Species with a dependence on or preference for offshore areas or habitats for feeding, shelter, or reproduction would be more likely to be affected by a spill than would other marine mammals (Würsig 1990).

Spills occurring in winter may accumulate and may be incorporated into the ice matrix and move with the ice pack. In spring, this oil may be released into ice leads that are used by migrating whales (such as beluga and bowhead whales) and by pinnipeds that use these areas, resulting in the exposure of relatively large numbers of individuals. Spills under ice or associated with leads may affect haulout sites, causing either abandonment or repeated exposure through use of the contaminated haulout. Because some species are relatively restricted to open-water areas associated with ice, individuals may not be able to disperse from spills in these areas, and thus may incur increased exposures. Because polar bears are closely associated with ice edges, spills accumulating along these areas may expose the greatest number of bears to an offshore spill. An oil spill in areas where polar bears congregate (e.g., leads or polynyas and beachcast marine mammal carcasses) could have negative population effects.

Marine mammals that frequently groom, such as polar bears, would be most likely to ingest oil. Feeding on contaminated prey or carcasses also causes ingestion of oil (Fair and Becker 2000). With the exception of bearded seals who may enter the water within hours of being born, newborn seals are more sensitive to oil than adult seals, as they have little fat and rely on a dense layer of fur (lanugo). Loss of this waterproofing by oil could cause hypothermia and death (Fair and Becker 2000).

The magnitude and extent of any adverse effects will also depend on how quickly a spill is contained and how quickly and effectively cleanup is accomplished (USFWS 2004). Arctic conditions (i.e., sea ice, wind, temperature, limited visibility, and sea state) can potentially impact oil spill responses. Other than high sea state (choppy waves), which can enhance the effectiveness of chemical dispersants, most extremes in arctic conditions hinder spill response activities (Nuka Research and Planning Group 2007). Lessees are required to have contingency plans to prevent, address, and clean up oil spills (ADNR 1999). Spill cleanup operations could result in short-term disturbance of marine mammals in the vicinity of the cleanup activity, while a collision with a cleanup vessel could injure or kill marine mammals. Disturbance of adults with young during cleanup could reduce survival of the young animals. For example, vessel and human activities associated with cleanup efforts may cause pinnipeds to abandon coastal haulout areas and/or rookeries for an extended period of time. Cleanup operations, including helicopter overflights and vessel traffic, could also potentially increase pup mortality if operations were to occur near rookeries. Aircraft readily disturb pinnipeds and walruses, which can cause adults to stampede into the water, trampling pups in the process. Any increased mortality in a pinniped population could impact the population as a whole, especially for sensitive or declining populations (e.g., Pacific walruses).

An approved oil spill response plan would be required for all exploration and production activities. Oil-containment and cleanup activities would be initiated a short time following an oil spill (MMS 2003e). Oil spill response activities may affect marine mammals through exposure to spill response chemicals (e.g., dispersants or coagulants) or through behavioral disturbance by cleanup operations or habitat disturbance. The chemicals used during a spill response are toxic, but are considered much less so than the constituents of spilled oil (Wells 1989), although there is little information regarding their potential effects on marine mammals. The presence of, and noise generated by, oil spill response equipment and support vessels could temporarily disturb marine mammals in the vicinity of the response action, with affected individuals likely leaving

the area. While such displacement may affect only a small number of animals and not result in population-level effects, cleanup operations disturbing adults in pup-rearing areas may decrease pup survival. Oil spill response support vessels may also increase the risk of collisions between these vessels and marine mammals in the vicinity of the spill response. During oil spill cleanup activities, interactions with humans could cause polar bear disturbance, injury, or death. For example, cleanup operations that disturb a den could result in the death of cubs through abandonment and perhaps death of the mother.

Catastrophic Discharge Event. The PEIS analyzes a CDE of 1.4 to 2.2 million bbl for the Chukchi Sea and 1.7 to 3.9 million bbl for the Beaufort Sea (Table 4.4.2-2). If a CDE occurs, there is greater potential for more severe effects compared to the risk of effects from a large oil spill. A CDE would result in sustained degradation of water quality and, to a lesser extent, air quality that would impact marine mammals from direct contact, inhalation, and ingestion (either directly or indirectly through the consumption of oiled forage or prey species). These effects would be significant, causing a multitude of acute and chronic effects. Additional effects on marine mammals would occur from water and air quality degradation associated with response and cleanup vessels, *in situ* burning of oil, dispersant use, discharges and seafloor disturbances from relief well drilling, and activities on shorelines associated with cleanup, booming, beach cleaning, and monitoring. A CDE has the potential to increase the area and duration of an oil spill, thereby increasing the potential for population-level effects, or at a minimum, an increase in the number of individuals killed. For example, a catastrophic discharge event contaminating ice leads or polynyas in the spring could have devastating effects, trapping bowhead whales where they may encounter fresh crude oil. Beluga whales that also use the spring lead system to migrate would also be susceptible to a spill that concentrates in these leads.

Terrestrial Mammals. The terrestrial mammal communities present within the Beaufort and Chukchi Sea Planning Areas include a variety of small mammals (e.g., rodents), big game, and furbearer species. Species of particular concern are the caribou, muskoxen, grizzly bear, and arctic fox. Section 3.6.4.2.1 provides an overview of these species.

Routine Operations. Under routine operations for the proposed action, terrestrial mammals could be affected by the construction and operation of new onshore pipelines and from vehicle traffic and helicopter overflights.

<u>Construction and Operation of Onshore Pipelines.</u> Under the proposed action, 16 to 129 km (10 to 80 mi) of new onshore pipeline would be installed along the Beaufort Sea, which could result in 73 to 584 ha (180 to 1,443 ac) of soil disturbance (Table 4.4.1-4). The areas disturbed represent an extremely small portion of terrestrial wildlife habitat that occurs inshore of the Beaufort and Chukchi Sea Planning Areas.

Caribou. In general, caribou use coastal areas of the North Slope largely in June, July, and August, although a portion of the Western Arctic Herd may overwinter in coastal habitats bordering the Chukchi Sea, and in some years, the Teshekpuk Lake Herd may remain on the Arctic Coastal Plain throughout the winter. Because onshore pipeline construction would likely occur in winter to minimize impacts on the ground surface and vegetation, construction activities

would not affect caribou calving or foraging in summer. Construction could, however, disturb caribou in overwintering areas, causing them to vacate preferred overwintering areas and move into less suitable habitats. Such displacement could affect individuals or local populations as a result of increased energy expenditure associated with movement to, and use of, suboptimal habitat, with subsequent mortality and reduced productivity (NRC 2003a).

If construction were to occur in late spring and summer, calving caribou, females with newborn calves, and older foraging calves could be disturbed. Affected individuals would likely leave or avoid habitats in the vicinity of the construction activities and move into potentially less suitable habitats. During the calving season from late May until late June, which includes the actual calving dates and the following 2 to 3 weeks, cows with calves are particularly susceptible to disturbance by human activities, and such displacement could result in population-level effects if calving success and calf survival are reduced (NRC 2003a).

Overall, caribou may be disturbed during construction or affected by the presence of new onshore pipeline. The response of caribou may include the avoidance or abandonment of preferred habitats in the vicinity of the new pipeline, with subsequent displacement to other potentially suboptimal areas. The magnitude of any such effects would be a function of the specific location of the new pipeline relative to preferred habitats (such as calving and foraging grounds and insect-avoidance areas), the location and length of the pipeline, and the number of individuals affected — the greater the length and distance of the new pipeline from existing pipelines (particularly TAPS), the greater the potential for affecting caribou and the greater the number of caribou and caribou herds that could be affected.

While pipelines built lower than 1.5 m (4.9 ft) above the ground surface may act as physical barriers to movement (NRC 2003a), a pipeline constructed to current clearance standards (with a minimum clearance of 1.5 m [4.9 ft]) would not be expected to physically hinder caribou crossings (Curatolo and Murphy 1986). Caribou have been shown to be reluctant in approaching pipelines and to exhibit reduced crossing success of pipelines located in close proximity to roadways with traffic. Thus, the presence of a new pipeline may affect daily or seasonal movements of some individuals and herds.

Muskoxen. Muskoxen are expected to avoid the area where construction of new pipeline is occurring. It is not known how construction disturbance or the presence of a completed pipeline would affect muskoxen habitat use and reproductive success. However, muskoxen may be particularly vulnerable to disturbance in winter because of limited habitat, the length of the arctic winter, the need to conserve energy throughout the winter, and, for females, the need to maintain good body condition throughout winter and spring for calving (Reynolds et al. 2002). However, because of the small population size of muskoxen, disturbance from pipeline construction could result in population-level effects, especially if this species is disturbed during winter. The limited distribution and small population size of muskoxen in the coastal and inland areas adjacent to the Beaufort and Chukchi Sea Planning Areas would greatly reduce the likelihood for disturbance of this species.

The presence of a completed pipeline may hinder movement by muskoxen if there is insufficient pipeline clearance for this species. However, muskoxen do not exhibit as extensive

seasonal or daily movements as caribou. If undisturbed, muskoxen remain in relatively small areas throughout the winter, while in summer they exhibit longer movements that track the emergence of high-quality forage plants (Reynolds et al. 2002). In summer, most daily movements of radio-tracked individuals in the Arctic National Wildlife Refuge (ANWR) were reported to be less than 5 km (3 mi) in length, and many were typically less than 1 km (0.6 mi) in length (Reynolds et al. 2002). Existing pipelines associated with the North Slope oil fields and TAPS do not appear to have hindered the westward expansion of muskoxen from ANWR. For muskoxen to have expanded their range from ANWR to the Colville River, some individuals had to cross the TAPS ROW or travel through the oil fields on the North Slope (BLM 2002). Thus, the presence of a new pipeline is not expected to adversely affect muskoxen populations in onshore areas adjacent to the Beaufort and Chukchi Sea Planning Areas.

Brown Bear. The brown bear uses the coastal environments and/or terrestrial oil transportation routes onshore of the entire Beaufort and Chukchi Sea Planning Areas. Winter construction of onshore pipeline could disrupt individual bear dens. In summer, some individuals may temporarily leave habitats in the vicinity of active construction. However, because bears often habituate to human activities and facilities (Follmann and Hechtel 1990), the presence of new pipeline is not expected to directly adversely affect the grizzly bear.

Arctic Fox. Arctic foxes occur throughout the Beaufort and Chukchi Sea Planning Areas, using the coastal and shore-fast ice habitats. The arctic fox would not be adversely affected by the construction or operation of new pipeline. Individuals would likely abandon habitats temporarily in the vicinity of construction activities. Because the completed pipeline could provide increased shelter and den habitat, populations of arctic fox could increase along the pipeline corridor. An increase in fox abundance could lead to increased outbreak of disease (rabies, canine distemper) among foxes living along the pipeline corridor, as well as increased predation pressures on populations of prey species.

Foxes are highly mobile, and in late autumn and winter, they disperse out onto the sea ice in search of food. Because of this mobility, foxes may visit new offshore facilities (e.g., drilling platforms, ice roads, exploratory seismic trains) in search of food when sea ice is present. Arctic foxes were regularly observed near Seal Island in the Northstar development during the ice-covered season (MMS 2002a). Thus, depending on their number and distance from shore, new offshore platforms may provide additional winter food supplies and increase winter survival of some individuals.

<u>Vehicle Traffic and Helicopter Overflights.</u> Vehicle traffic associated with operations of a pipeline (e.g., pipeline monitoring) could affect wildlife along the new pipeline and any associated access roads. In addition, new access roads may also increase the incidence of vehicles associated with recreation, subsistence hunting, and other activities. Vehicle traffic could disturb wildlife foraging along roadways, causing affected wildlife to temporarily stop normal activities (e.g., foraging, resting) or leave the area. Collision with vehicles could result in mortality, especially in areas with concentrations of wildlife or along migration corridors. Vehicle traffic along any access road associated with the proposed action would likely be light. Thus, the incidence of such collisions would be very low and not expected to result in population-level impacts on wildlife.

Helicopter overflights associated with pipeline monitoring and transport of personnel and supplies may disturb wildlife. The effects of helicopters on wildlife vary by species, populations, habitat type, and environmental variables. Some species may become habituated and experience no adverse effects (e.g., see Harting 1987). Routine overflights by surveillance helicopters would result in a short-term disturbance to animals along the pipeline route, causing them to temporarily alter behaviors, and would not be expected to result in long-term population-level effects.

Caribou. Responses to vehicle and helicopter traffic by caribou can vary from no response to panic behavior. Cow and calf groups appear to be most sensitive (Valkenburg and Davis 1984; MMS 1998). Because caribou tend to avoid transportation corridors (Dau and Cameron 1986; Griffith et al. 2002; Cameron et al. 2002; NRC 2003a), disturbance of caribou by vehicle traffic associated with normal operations of an onshore pipeline would be infrequent. Single passes by helicopters may result in short-term disturbances that should not adversely affect caribou (MMS 1998). Low-flying helicopters are more likely to produce negative responses from caribou than are light, fixed-wing aircraft (Maier et al. 1998). McKechnie and Gladwin (1993) evaluated altitude tolerance thresholds below which aircraft overflights elicit panic and escape responses and determined that the tolerance threshold for a fixed-wing aircraft was 61 m (200 ft), with few or no response reactions observed above 153 m (500 ft). In contrast, the tolerance threshold for helicopters was determined to be 306 m (1,000 ft) in altitude (Miller and Gunn 1979).

Muskoxen. Vehicle traffic along a pipeline access road would likely result in temporary disturbance of muskoxen in the immediate vicinity of the roadway. The response of muskoxen to aircraft overflights has been reported to range from calm to excitable, and the nature of the response depends in part on the altitude of the overflight, terrain, climate, sex, group size, number of calves present in a group, and habituation (Miller and Gunn 1979, 1980). Helicopter and low-flying aircraft overflights can cause muskoxen to stampede and abandon their calves (NRC 2003a). While responses of muskoxen to vehicle traffic and aircraft overflights associated with the proposed action are not expected to adversely affect muskoxen populations, energetic costs associated with forced movements (especially if frequent) in winter could adversely affect spring calving and could result in population-level effects.

Brown Bear. Some brown bears may be injured or killed by collisions with vehicles along access roads, while bears in the vicinity of vehicle traffic may be disturbed and temporarily cease normal behavior or leave the area until the vehicle has passed. Aircraft overflights have been reported to elicit a variety of responses in brown bears, including escape behavior and hiding (Larkin 1996). While vehicle traffic and aircraft overflights associated with the proposed action may on occasion temporarily disturb individual bears, long-term population-level effects would not be expected from normal operations.

Arctic Fox. The Arctic fox may experience temporary disturbance from vehicle traffic and aircraft overflights, resulting in hiding, departure from the immediate area, or cessation of normal behaviors. Some individuals crossing or traveling along access roads may be injured or killed by vehicle traffic. Relatively few individuals are expected to be affected, and population-level impacts would not be expected under normal operations.

Accidents. Accidents under the proposed action that could affect terrestrial wildlife would be largely limited to an oil spill from a new pipeline. The impacts on wildlife from an oil spill would depend on such factors as the time of year and volume of the spill, type and extent of habitat affected, and home range or density of the wildlife species. The potential effects on wildlife from oil spills could occur from direct contamination of individual animals, contamination of habitats, and contamination of food resources. Acute (short-term) effects usually occur from direct oiling of animals (e.g., exposure to toxic hydrocarbons via inhalation and/or by ingestion of oil while grooming contaminated fur), while chronic (long-term) effects generally result from such factors as accumulation of contaminants from food items and environmental media (e.g., water).

Up to two large pipeline spills are expected to occur over the lifetime of the proposed action (Table 4.4.2-1). For the most part, expected spills would occur at offshore facilities rather than from the onshore pipeline. Wildlife may be exposed to spilled oil by eating a variety of oiled vegetation, wildlife, and/or contaminated carrion. In addition, animals occurring within a spill area may also be exposed via inhalation of aromatic hydrocarbons. Such exposure would likely result in sublethal or lethal effects. The magnitude of the effect will depend on the level of exposure, the life stage of the exposed bear (i.e., adult, cub), and the condition of the exposed animal (i.e., healthy, injured).

Oil spills could potentially affect arctic foxes through contamination of prey, reduction of prey availability, and fouling of fur, causing loss of its insulating capacity. Arctic foxes would be vulnerable to oil ingestion from grooming their fur (Nuka Research and Planning Group, LLC and Pearson Consulting, LLC 2010). Although arctic foxes are abundant predators on the North Slope, their mobility allows them to disperse from oiled areas, if necessary. Because arctic foxes are opportunistic carnivores, they may prey on oiled birds and small mammals and consume oiled carcasses, thereby increasing their potential for incurring lethal and sublethal exposure to the spilled oil and its breakdown products. While some loss of arctic foxes may occur as a result of this exposure, this loss would be limited to animals in the vicinity of the spill. While a local population-level effect may result, recruitment from other areas would likely quickly replace the lost individuals.

Staging and support activities for cleanup of a large offshore spill could temporarily displace terrestrial mammals. Oil spill cleanup activities on land may displace these animals from not only contaminated habitats but also nearby uncontaminated habitats. This displacement could reduce energy reserves (especially in winter), which in turn could affect body condition and calving success.

Catastrophic Discharge Event. The PEIS analyzes a CDE of 1.4–2.2 million bbl in the Chukchi Sea and 1.7-3.9 million bbl in the Beaufort Sea (Table 4.4.2-2). If a CDE occurs, there is greater potential for more severe effects compared to the risk of effects from a large oil spill. A CDE would result in sustained degradation of water quality, shoreline terrestrial habitats, and, to a lesser extent, air quality that could impact terrestrial mammals from direct contact, inhalation, and ingestion (either directly or indirectly through the consumption of oiled forage or prey species). These effects could be severe where persistent, heavy oil makes contact with important habitat and prey base, causing a multitude of acute and chronic effects. Additional

effects on terrestrial mammals would occur from land and air quality degradation associated with response and cleanup vessels, *in situ* burning of oil, dispersant use, and activities on shorelines associated with cleanup, booming, beach cleaning, and monitoring. A CDE has the potential to alter terrestrial mammal habitats and populations. The potential for a population-level impact would occur in the unlikely event that a spill occurred in an area where a large number of individual animals are concentrated. For instance, population-level effects to caribou would be most likely from spills occurring in calving areas and along migration corridors. For the muskoxen, the potential for population-level effects would be greatest for a spill occurring in winter when this species remains in small areas, restricted by the availability of forage (Reynolds et al. 2002).

4.4.7.1.4 Conclusion.

Routine Operations.

Marine Mammals.

Under the proposed action, routine operations could affect marine mammals in the northern GOM. The levels of impacts to marine mammals for each of the planning areas are:

- GOM: Impacts on cetaceans could range from negligible to moderate, while impacts on the West Indian manatee would be negligible. Rare or extralimital species are not likely to be affected by routine operations.

- Cook Inlet: Impacts to marine mammals could range from negligible to moderate. Many of the listed cetacean species occur infrequently, if at all, within the Cook Inlet Planning Area and thus would not be expected to be affected by normal operations. Cook Inlet belugas primarily occur in the upper portion of Cook Inlet that is not in the Cook Inlet Planning Area.

- Arctic: Impacts to marine mammals could range from negligible to moderate.

Noise generated during seismic surveys, exploration and production activities, platform removal, and by OCS-related vessels and helicopters may temporarily disturb some individuals. Contaminants in waste discharges and drilling muds might indirectly affect marine mammals through food-chain biomagnification, although the scope of effects and their magnitude are not known. However, this information is not essential to the determination of a reasoned choice among alternatives. Small numbers of marine mammals could be killed or injured by chance collision with service vessels and by eating indigestible debris, particularly plastic items, lost from service vessels, drilling rigs, and platforms (including FPSO facilities for the GOM). While vessels may collide with marine mammals, the most likely impact on marine mammals would be changes in behavior (e.g., avoidance responses). Normal behavior is expected to return once a vessel or helicopter has passed. It is expected that structure removal would cause only minor behavioral changes and non-injurious physiological effects on cetaceans as a result of the

implementation of BOEM guidelines and the NOAA Fisheries Observer Program for explosive removals.

Terrestrial Mammals.

Gulf of Mexico. The four federally endangered GOM coast beach mice subspecies and the federally endangered Florida salt marsh vole and their habitats would not be affected by normal operations under the proposed action.

Cook Inlet. Overall, routine activities associated with the proposed action will have negligible to minor impacts on the size and productivity of terrestrial mammal species along the shorelines of Cook Inlet. Up to 120 km (75 mi) of onshore pipeline would be constructed and operated as part of the proposed project; thus, impacts to terrestrial mammals would include a minor loss or modification of habitat and behavioral responses associated with occasional helicopter traffic to and from new platforms. Loss or modification of habitat for the pipeline would affect a very minor amount of wildlife habitat within the Cook Inlet area. The disturbance of wildlife by helicopter flights would be short-term in nature and not expected to result in population-level effects.

Arctic. Impacts to terrestrial mammals could range from negligible to moderate. The construction and normal operations of up to 129 km (80 mi) of new pipeline could result in a variety of short-term and long-term impacts to terrestrial mammals. Short-term impacts would largely be behavioral in nature, with affected animals avoiding or vacating the construction areas. Similarly, vehicle and aircraft traffic associated with the proposed action could temporarily disturb mammals near access roads or under flight paths. While the disturbance of these animals would be short-term in nature, the energetic costs incurred by some of the disturbed biota (especially overwintering muskoxen and pre-calving female caribou) could affect reproductive success. Therefore, disturbances could result in longer term impacts to animal populations. The presence of a new onshore pipeline may result in the displacement from preferred habitats to less suitable habitats for overwintering muskoxen, calving female caribou, and female caribou and their calves. Such displacement may reduce overwinter conditioning or survival as well as calving success. While population-level effects may not be likely for caribou, local population-level effects may occur for muskoxen because of the small population size in Alaska. While vehicle traffic and aircraft overflights associated with the proposed action may on occasion temporarily disturb brown bears and arctic foxes, long-term population-level effects would not be expected from normal operations. Overall, routine activities associated with the proposed action are not expected to have long-term major impacts on the size and productivity of terrestrial mammal species of the North Slope of Alaska.

Accidents.

Marine Mammals. Any of the oil spill scenarios developed for the proposed action (Section 4.4.2) may expose marine mammals to oil or its weathering products. Overall, oil spills are expected to have small to medium impacts to marine mammals, while impacts from oil spill response activities are expected to be small. In the case of a low probability CDE, there is greater potential for more severe and population-level effects compared to a large oil spill. The

magnitude of effects from accidental spills would depend on the location, timing, and volume of the spills; the environmental settings of the spills (e.g., restricted coastal waterway, deepwater pelagic location); and the species (and its ecology) exposed to the spills. Spill cleanup operations could result in short-term disturbance of marine mammals in the vicinity of the cleanup activity, while a collision with a cleanup vessel could injure or kill the affected individual. In general, oil spill impacts on species that are extralimital to rare are expected to be small, but could be larger depending on the number of individuals contacted by a spill.

Terrestrial Mammals.

GOM. Because of their locations on inner dunes, the habitats of the beach mice are unlikely to be affected by an accidental offshore oil spill. While the habitat of the Florida salt marsh vole could be affected by an oil spill, this species and its habitat are located far from areas where oil leasing and development may occur under the proposed action. Thus, it is highly unlikely that this habitat would be contacted by an accidental oil spill from OCS oil and gas activities. Potential impacts of accidents on terrestrial mammals are not expected.

Cook Inlet and Arctic. Overall, oil spills are expected to have minimal to small impacts to terrestrial mammals, while impacts from oil spill response activities are expected to be very small. In the event of an accidental spill, terrestrial mammals may be exposed via ingestion of contaminated food, inhalation of airborne oil droplets, and direct ingestion of oil during grooming, which may result in a variety of lethal and sublethal effects. However, because most spills would be relatively small (≤ 1,000 bbl), relatively few individuals would likely be exposed. While some individuals may incur lethal effects, population-level impacts would not be expected for most species. Cleanup activities could temporarily disturb terrestrial mammals in the vicinity of the cleanup operation, causing those animals to move from preferred to less optimal habitats, which, in turn, could affect overall condition. Such displacement would be limited to those relatively few animals in the vicinity of the cleanup activity, and thus would not be expected to result in population-level effects.

4.4.7.2 Marine and Coastal Birds

Each of the four phases of OCS oil and gas development have associated impact-producing factors (Table 4.1.1-1), some of which may affect marine and coastal birds in the Planning Areas included in the proposed action. Oil and gas development activities that may occur following lease sales under the proposed action and that may affect marine and coastal birds include (1) offshore structure placement and pipeline trenching; (2) offshore structure removal; (3) operational discharges and wastes; (4) OCS vessel and aircraft traffic; (5) construction and operation of onshore infrastructure (including new pipeline landfalls); and (6) noise. Table 4.4.7-2 identifies the impacting factors associated with routine operations that could affect birds and the aspects of marine and coastal birds that could be affected by those factors.

In general, routine operations associated with oil and gas development are not expected to result in population-level effects on marine and coastal birds. Most impacts from routine

TABLE 4.4.7-2 Impacting Factors and the Marine and Coastal Bird Resource Components That Could Be Affected with Oil and Gas Development under the Proposed Action

	Resource Component Potentially Affected								
	Habitat[a]			Life Stage[b]			Behavior		
Development Phase and Impacting Factors That May Affect Marine and Coastal Birds	Nesting	Foraging	Overwintering	Nestlings	Juveniles	Adults	Foraging	Courtship/ Nesting	Migration/ Staging
Impacting Factors Common to All Phases									
Helicopter noise	-[c]	-	-	+	+	+	+	+	-
Helicopter traffic	-	-	-	+	+	+	+	+	-
Ship noise	-	-	-	-	-	-	-	-	-
Ship traffic	-	-	-	+	+	+	+	+	+
Hazardous materials	-	-	-	+	+	+	-	-	-
Solid wastes	-	-	-	+	+	+	-	-	-
Offshore lighting	-	-	-	-	+	+	-	-	+
Offshore air emissions	-	-	-	-	-	-	-	-	-
Exploration – Exploratory Drilling									
Seismic noise	-	-	-	-	+	+	+	-	-
Drilling noise	-	-	-	-	+	+	-	-	-
Drilling mud/debris	-	-	-	-	+	+	-	-	-
Offshore Development									
Drilling noise	-	-	-	-	+	+	+	-	-
Trenching noise	-	-	-	+	+	+	+	+	-
Drilling mud/debris	-	-	-	-	+	+	+	-	-
Pipeline trenching	-	+	+	+	+	+	+	-	-
Wellhead and platform placement	-	-	-	-	+	+	+	-	-
Onshore Development									
Site clearing	++	++	-	++	+	+	++	++	+
Construction activity	-	-	-	+	+	+	+	+	+
Construction noise	-	-	-	+	+	+	+	+	+
Production									
Platform collisions	-	-	-	-	+	+	-	-	-
Production noise	-	-	-	-	+	+	-	-	-
Produced water	-	-	-	-	+	+	-	-	-
Drill mud/debris	-	-	-	-	-	-	-	-	-
Decommissioning									
Explosive platform removal	-	-	-	-	+	+	+	-	-
Non-explosive platform removal	-	-	-	-	+	+	+	-	-

[a] Reflects only direct loss or physical degradation of the habitat and not habitat use.

[b] Reflects only injury or mortality of affected life stage.

[c] A dash (-) indicates no or negligible effect anticipated; "+" indicates potentially minor impacts, "++" indicates potentially moderate impacts, and "+++" indicates possible major impacts and possible population-level effects. See Section 4.1.4 for impact level definitions.

operations would be localized to the site of the project infrastructure or along support vehicle routes, would for most operations be short term or transient, and would likely affect relatively few individuals or habitats. The greatest potential for longer term and possibly population-level impacts would be associated with very large accidental oil spills. In most areas, small spills would likely affect relatively small numbers of birds and habitats. In contrast, very large spills could affect habitats along extensive areas of coastline and large numbers of birds and important habitats (such as nesting colonies or wintering grounds). Depending on the timing, duration, size, and location of a very large spill, population-level impacts could be incurred by some species.

4.4.7.2.1 Gulf of Mexico.

Routine Operations. Routine activities associated with the proposed action that may affect marine and coastal birds in the northern GOM include (1) offshore structure placement and pipeline trenching, (2) offshore structure removal, (3) operational discharges and wastes, (4) OCS vessel and aircraft traffic, (5) construction and operation of onshore infrastructure (including new pipeline landfalls), and (6) noise. Potential impacts associated with these activities may include injury or mortality of birds from collisions with platforms, vessels, and aircraft; exposure to operational discharges; ingestion of trash or debris; loss or degradation of habitat due to construction; and behavioral disturbance due to the presence of, and noise generated by, equipment and human activity (Russell 2005). The nature and magnitude of effects on birds will depend on the specific location of an activity or completed structure (e.g., with greater impacts if a pipeline landfall construction would occur adjacent to a heron rookery), the timing of the activity (e.g., construction that occurs during nesting), and the nature and magnitude of the activity (e.g., the number of miles of trenching through nearshore coastal habitats, the quantity and concentrations of the production water discharges).

Offshore Structure Placement and Pipeline Trenching. The construction of new offshore infrastructure is not expected to adversely affect marine and coastal birds. Pipeline trenching may affect birds in nearshore coastal areas if trenching occurs in or near foraging or nesting areas. For many species, the effects would be primarily behavioral, namely, the short-term avoidance or abandonment of habitats in the immediate area of trenching. Pipeline trenching near nesting colonies (such as heron rookeries) may disturb adults that are incubating eggs or feeding young, potentially affecting nesting success. Because trenching could result in some long-term loss of coastal habitat (see Section 4.4.6.1.1), habitat loss for some species may also occur. Such impacts could be avoided or minimized by locating pipeline corridors away from nesting aggregations and/or by scheduling trenching activities to avoid the nesting period.

Seabirds such as the brown pelican often use offshore oil and gas production platforms as rest areas or as temporary shelters during inclement weather. In addition, offshore platforms are also used in spring and fall for resting and feeding stopovers by birds migrating to and from more southern wintering areas (Baust et al. 1981; Russell 2005). For example, in the fall, many migratory species (including waterfowl, shorebirds, and passerines) arrive at the GOM coast and then fly several hundred miles across the open GOM waters directly for to Central and South America (Lincoln et al. 1998). This route appears to be preferred over the safer but more

circuitous land or island routes by way of Texas or Florida. The use of offshore platforms may increase the survivability of individuals using these structures to rest or as shelter during bad weather conditions in the open waters of the GOM (Russell 2005).

Migrating birds may collide with offshore platforms. Annual bird mortality from collisions with offshore platforms has been estimated at 200,000 birds in the northern GOM, with an average of 50 collision deaths per platform per year (Russell 2005). This is probably an underestimate of actual collision mortality incurred by migrating birds, because it is based only on birds recovered from the platforms; birds falling into the water are not reflected in these mortality estimates (Russell 2005). Applying the 50 collision deaths per platform per year estimate, new platforms that could be constructed following lease sales held under the proposed action may result in a total incremental increase of about 10,000 to 22,500 bird collision mortalities. By comparison, hundreds of millions of birds are killed each year colliding with communication towers, windows, electric transmission lines, and other structures (e.g., see Klem 1989, 1990; Dunn 1993). Migrating birds may also be drawn to a lighted platform and circle the platform before moving on or stopping on the platform (Russel 2005). Such circling behavior could increase the potential for a platform collision and use up valuable energy reserves needed for completing the trans-GOM migration.

Offshore Structure Removal. Under the proposed action, up to 275 existing platforms could be removed from the GOM planning areas. Because many marine birds, as well as migratory birds, are attracted to platforms, there is a potential for some individuals to be affected if they are present during platform removal activities. Typical platform decommissioning involves dismantling many of the above-platform structures, followed by the use of underwater explosives to collapse the platform proper. Birds using a platform undergoing decommissioning would likely leave the platform during dismantling activities. Any remaining birds would be startled by the underwater detonations and quickly leave the collapsing structure. Thus, only negligible minor impacts on relatively few individual birds would be expected from decommissioning activities under the proposed action.

The explosive removal of offshore structures is not expected to affect any of the birds listed under the ESA that occur in the three planning areas. Only two species, the roseate tern and the red knot (a candidate species), are likely to visit offshore platforms either during migration (red knot) or during normal foraging activities (roseate tern). The NMFS has previously evaluated the explosive removal of offshore platforms in the GOM and issued a Biological Opinion that concluded that such structure removal would not jeopardize birds listed under the ESA (NMFS 1988). In addition, the BOEMRE has established guidelines for explosive platform removals (30 CFR 250). These guidelines require structure removal–specific plans to protect marine life and the environment and specify procedures and mitigation measures to be taken to minimize potential impacts. BOEMRE conducts detailed technical and environmental reviews of proposed removal projects to ensure that listed species would not be affected; these reviews include consultation with NMFS and USFWS. Thus, compliance with the BOEMRE guidelines should further reduce the likelihood that offshore structure removal would affect either the red knot or the roseate tern.

Operational Discharges and Wastes. Normal operational wastes may include produced water, drilling muds, and drill cuttings discharged from offshore platforms, waste fluids produced on OCS vessels, and trash and debris generated on platforms and vessels. A number of normal operational discharges and wastes have the potential to affect marine and coastal birds.

The discharge of production wastes into open water is prohibited in coastal waters but permitted in marine waters under the NPDES program (see Section 4.4.3.1). Produced water, drilling muds, and drill cuttings are routinely discharged from production platforms in the GOM into offshore marine waters in compliance with applicable regulations and permits, and would continue to be so discharged with any development following lease sales under the proposed action. The discharged materials may contain a variety of constituents (e.g., trace metals, hydrocarbons) that may be toxic to birds. In marine waters, birds could be exposed to these materials by direct contact or through the ingestion of contaminated food items. Birds most likely to be present at offshore production locations where operational discharges are occurring are those that forage on fish in offshore waters and may frequent offshore facilities; these include pelicans, frigatebirds, gannets, and terns.

Upon discharge in accordance with permit specifications, production wastes would be rapidly diluted in the water column (i.e., to ambient levels within several thousand meters of discharge [see Section 4.4.3.1.1]) and dispersed by currents, thus greatly reducing the magnitude of exposure that a bird might incur. If constituents of the discharged materials bioaccumulate or biomagnify, there is a potential that some birds may be exposed through their food. Field studies have shown that the concentrations of trace metals, hydrocarbons, or NORM in the tissues of fishes collected around production platforms are within background levels (Neff 1997a). Thus, food chain uptake is likely not a major exposure pathway for fish-eating birds at offshore facilities.

Among the threatened and endangered species present in the northern GOM planning areas (see Section 3.8.2.1.2), only the roseate tern and the candidate red knot may be expected at offshore platforms. The roseate tern, which is known to occur in oceanic waters, occurs within the Florida Keys and southeastern Florida (USFWS 1999; FFWCC 2003). Because these areas are hundreds of kilometers away from the portion of the EPA where oil and gas leasing and development might occur under the proposed action, the roseate tern would not be expected to be exposed to production wastes generated at offshore facilities. The red knot is a shorebird that would occur only at a platform during spring and fall migrations, and then only if stopping to rest on a platform while crossing the GOM. As this species is not an open-water feeder or swimmer, no exposure to operational discharges would be expected for the red knot.

Some bird species may also be affected indirectly if the discharges reduce the abundance of prey species (NRC 1983; API 1989; Kennicutt 1995). However, because of the rapid dilution that would occur, potential impacts on prey populations inhabiting the water column (e.g., fish, plankton) would likely be limited in extent and not be expected to significantly affect overall prey abundance (see Sections 4.4.7.3.1 and 4.4.7.5.1). While some production-related contaminants may reach sediments and reduce macroinfaunal abundance (Rabalais et al. 1998), the potentially affected macroinvertebrate biota would be at depths beyond the diving limits of birds. Sediment impacts can last for years after the discharge period has ended (Rye et al. 2008)

and can cause an overall impoverishment of the benthic community (Daan and Mulder 1996). These sediment changes may affect benthic larval or juvenile stages of species which would eventually become prey for seabirds.

Many species of marine birds (especially gulls) often follow ships and forage in their wake on fish and other prey injured or disoriented by the passing vessel. In doing so, these birds may be affected by discharges of waste fluids (such as bilge water) generated by OCS vessels. Discharges of such wastes from OCS service and construction vessels, when allowed, would be regulated under applicable NPDES permits (see Section 4.4.3.1); any discharged wastes would be quickly diluted and dispersed and thus not be expected to affect marine birds.

Marine and coastal birds may become entangled in or ingest floating, submerged, and beached debris (Heneman and the Center for Environmental Education 1988; Ryan 1987, 1990). Entanglement may result in strangulation, the injury or loss of limbs, entrapment, or the prevention or hindrance of the ability to fly or swim, and all these effects may be considered lethal. Ingestion of debris may irritate, block, or perforate the digestive tract, suppress appetite, impair digestion of food, reduce growth, or release toxic chemicals (Fry et al. 1985; Dickerman and Goelet 1987; Ryan 1988; Derraik 2002). Because the discharge or disposal of solid debris into offshore waters from OCS structures and vessels is prohibited by the BOEMRE (30 CFR 250.40) and the USCG (MARPOL, Annex V, Public Law 100-220 [101 Statute 1458]), entanglement in or ingestion of OCS-related trash and debris by marine and coastal birds would not be expected under normal operations.

Vessel and Aircraft Traffic. Under the proposed action, up to 600 vessel and 5,500 helicopter trips may take place weekly within the northern GOM planning areas. Birds may be affected in the following ways by this traffic: (1) they may be induced by vehicle noise to cease a particular activity (such as nesting or feeding) and leave the area, (2) they may incur injury or mortality through collision with a ship or helicopter, or (3) nests may be disturbed by excessive boat wakes.

Disturbance from noise is addressed later in this section. Birds disturbed by the presence of an OCS vessel may flee an area. Displaced birds would move to other habitats and may or may not return. In most cases, such displacement would be short term and transient and would not be expected to result in any lasting effects. However, if the displaced birds were occupying active nests, incubating eggs, or feeding and protecting hatchlings, even a short-term absence of the adult birds could increase predation of eggs or unfledged young, or reduce hatching success. However, because of the heavy commercial and recreational boat traffic in the northern GOM, most birds of the area are likely habituated to ship traffic and may only minimally react to passing OCS support vessels. In addition, OCS vessel traffic would likely occur within designated traffic lanes and not in waterways where birds may be nesting on beaches or other shoreline habitats. For this same reason, wakes from OCS-related vessels are also not expected to affect coastal birds and their nests. In addition, low-wake or wake-free vessel speeds are required while transiting across waterways that have sensitive shoreline resources (such as shorebird nesting colonies). Thus, compliance with such requirements would further minimize potential wake-induced impacts on birds.

A number of studies have examined the responses of birds to low-flying aircraft and atypical noise (see *Noise* discussion below). The results of many of these studies have indicated that although habituation may vary among species (Conomy et al. 1998), many species of birds will habituate to low-flying aircraft and noise and exhibit no effects on reproductive success (Black et al. 1984; Andersen et al. 1989; Delaney et al. 1999).

FAA guidelines for helicopter operations in the GOM request that pilots maintain a minimum altitude of 213 m (600 ft) while in transit offshore, 305 m (1,000 ft) over unpopulated areas or across coastlines, and 610 m (2,000 ft) over populated areas and sensitive habitats such as wildlife refuges and park properties (FAA 2010). Compliance with these guidelines regarding service altitudes for OCS helicopters would minimize disturbance of nesting or roosting birds within coastal areas.

Construction and Operation of Onshore Infrastructure. Loss or alteration of preferred habitat due to new OCS pipeline landfalls could result in the displacement of individuals or groups of birds from the affected area(s), including a possible decrease in nesting activities. Some pipelines in the central and western GOM have been brought to shore using a directional drilling process (MMS 2006a, 2008a) in which pipelines pass beneath coastal habitats to emerge inland at an onshore receiving facility, away from coastal habitats. Where used, this process could greatly reduce or avoid impacts on coastal habitats that are important to listed and non-listed marine and coastal birds.

Under the proposed action, up to 12 landfalls would be expected in the Western and Central GOM Planning Areas, with none occurring in the EPA. The location and small number of landfalls that could occur with development associated with the proposed action would greatly limit the amount of coastal bird habitat that might be disturbed. In addition, siting of pipeline landfalls would consider the presence of sensitive habitats and areas, and avoid such areas to the maximum extent possible, further reducing the likelihood of affecting coastal bird habitats and the magnitude and extent of impacts on such habitats.

Noise. Noise generated during facility and pipeline construction, production operations, and platform removal activities, and by OCS ships and helicopters, may affect birds in a variety of ways. Unexpected noise can startle birds and potentially affect feeding, resting, or nesting behavior, and often causes flocks of birds to abandon the immediate area.

Much of the wildlife-related noise effects research has shown that noise may affect territory selection, territorial defense, dispersal, foraging success, fledging success, and song learning (e.g., Anderson et al. 1986; Gladwin et al. 1988; Larkin 1996). In many cases, the effects are temporary, with the birds becoming habituated to the noise. For example, weapons testing noise has been reported to have no significant effect on bald eagle activity or reproductive success, suggesting habituation of the birds to the noise (e.g., Brown et al. 1999). Studies of birds exposed to frequent low-level military jet aircraft overflights and simulated (with mortars, shotguns, and propane cannons) mid- to high-altitude sonic booms have shown aircraft and detonation noise to elicit some short-term behavioral responses but to have little effect on reproductive success (Ellis et al. 1991). Birds of prey have been reported to habituate to low-level helicopter flights and exhibit no effects on their reproductive success (Delaney et al. 1999;

Andersen et al. 1989), and low-level (<500 ft AGL) military training flights have been shown to have no effects on the establishment, size, and reproductive success of wading bird colonies in Florida (Black et al. 1984). On the basis of these studies, noise generated during normal operations is expected to have only short-term and transient effects on birds, and would not be expected to result in long-term disturbance or population-level effects.

Accidents. The accidental oil spill scenario for the GOM under the proposed action identifies as many as 8 large (≥1,000 bbl) and as many as 470 small (<1,000 bbl) oil spills potentially occurring with development that could result through the lease sales of the proposed action (Table 4.4.2-1). In the event of an accidental oil spill, birds may be adversely affected through direct contact with the spilled oil, by the fouling of their habitats and contamination of their food by the oil, and as a result of oil spill-response activities. Exposure of eggs, young, and adult birds to oil may result in a variety of lethal and sublethal effects. Fouling of habitats can reduce habitat quality, while contamination of foods may lead to a variety of lethal and sublethal toxic and physiological effects. Finally, oil spill-response activities may disturb birds in nearby habitats that are unaffected by an oil spill.

Adult and young birds may come in direct contact with oil on the water's surface or on oiled beaches, mudflats, and other shore features. Oil may also be physically transferred by nesting adults to eggs or young. Direct contact with oil by young and adult birds may result in the fouling or matting of feathers, which would affect flight and/or diving capabilities, affecting such activities as foraging and fleeing predators. Birds that have been fouled by oil also experience a loss in the insulating properties of their feathers, making them susceptible to hypothermia during cold weather periods. Oil making contact with skin, eyes, or other sensitive tissues may result in an irritation or inflammation of skin or sensitive tissues (Fry and Lowenstine 1985), while oiled eggs would incur reduced gas exchange.

Birds may ingest oil incidentally while foraging and while preening oiled feathers. Ingested oil may depress egg-laying activity or may result in the death or deformities of young (Fry et al. 1985; Leighton 1990). Direct effects of oil contact may be amplified under conditions of environmental stress such as low temperatures, migration movements, and molting. Indirect effects of oil contact include toxic effects from the consumption of contaminated food or starvation from the reduction of food resources (Lee and Socci 1989). The latter effects may hinder the recovery of impacted bird populations after a spill (Hartung 1995; Piatt and Anderson 1996; Piatt and Ford 1996).

Certain species of marine and coastal birds may be more susceptible to contact with spilled oil than others, based on their life histories. For example, diving birds and underwater swimmers such as loons, cormorants, and diving ducks may be the most susceptible to spilled oil because of their relatively long exposure time within the water and at the sea surface (Camphuysen 2007; Williams et al. 1995). Shorebirds and wetland birds may also be susceptible to direct oiling if a spill were to reach the beach intertidal zone or inshore wetland habitats, respectively, where these species forage and raise young (King and Sanger 1979). Oiled birds collected during response actions to the DWH event included seabirds, shorebirds, wetland birds, waterfowl, passerines, and raptors, with the majority of oiled birds being seabirds (see Section 3.8.2.1.5 and Table 3.8.2-6).

The magnitude of the impact would depend on the size, location, and timing of the spill; the species and life stage when exposed; and the size of the local bird population.

Spills in deep water are not likely to affect the listed and candidate bird species identified for the northern GOM (Table 3.8.2-3). Only the roseate tern and the red knot would be expected in areas of the outer inner continental shelf where deepwater spills could occur, and these occurrences would be transient and not expected to result in direct exposure to spilled oil. In contrast, all the listed and candidate species with the exception of the roseate tern could be exposed if a deepwater spill were to move into coastal waters and reach coastal habitats utilized by these species. Even if a deepwater spill were to reach coastal habitats, because of the great distance from shore at which a deepwater spill would originate, the oil would be greatly weathered, and therefore reduced in toxicity, by the time it reached the shore (see Section 4.4.3.1.2).

In contrast, a number of non-listed seabird species (e.g., terns, gulls, shearwaters, boobies, frigatebirds) could be exposed to deepwater spills. Some of these species are found only in pelagic areas of the GOM, while others inhabit waters of the continental shelf (see Section 3.1.2.3.2) (Duncan and Havard 1980; Davis et al. 2000). A number of these species forage in deepwater areas, are attracted to offshore platforms, and often follow vessels. These birds may be directly exposed while feeding or resting in spills originating from deepwater platforms or transport tankers and could incur lethal or sublethal effects. Depending on its size, location, and timing, a deepwater spill may affect only a few individuals or, as in the case of aggregations of overwintering gannets, a relatively large number of birds.

A shallow water spill in an offshore or nearshore area has the potential to affect a greater number of bird species than a deepwater spill of comparable size. Most threatened or endangered avian species are not likely to be affected by a spill unless a hurricane were to occur and spread oil inland to freshwater and terrestrial habitats. The piping plover and red knot could be exposed if their beach habitats become fouled by a spill. Because shorebirds tend to be flocking species, spills reaching habitats used by these species could result in the exposure of a relatively large number of individuals. While the sandhill crane, wood stork, and whooping crane could be exposed if a spill were to foul their coastal wetland habitats. Because of the very specific and limited winter habitat that supports the majority of whooping cranes, a spill affecting this habitat could result in a major impact on this species. Audubon's crested caracara, while reported to use coastal dune habitats, is generally more of a terrestrial species and would not be expected to occur along beach and wetland habitats. The roseate tern breeds in scattered colonies along the Florida Keys (see Section 3.8.2.1.2) and could be exposed if a spill were to occur in the extreme southeastern portion of the EPA. Under the proposed action, however, lease sales would be limited to the extreme western portion of this planning area, hundreds of miles from the nearest nesting colony of this tern. Thus, this species would not be expected to be exposed to any accidental spills that might occur in association with a lease sale under the proposed action.

Accidental spills in shallow water could affect a wide variety of non-listed species. In offshore locations, shallow water spills could expose any of a large number of ducks, cormorants, terns, grebes, and gulls. Spills reaching shoreline habitats such as beaches,

mudflats, and wetlands could affect shorebirds (e.g., sandpipers, plovers), wading birds (e.g., herons, bitterns), wetland birds (e.g., rails, coots, blackbirds), and a wide variety of migratory birds. Spills occurring during the fall or spring migrations have the potential to expose large numbers of birds in both nearshore coastal waters and in coastal habitats such as beaches, flats, and wetlands. The magnitude of impacts that could result from an accidental spill in shallow water would depend on the timing, duration, location, and size of the spill; the habitats that came in contact with the spill; and the species and numbers of birds exposed to the spill.

Besides being affected by the spill itself, marine and coastal birds may be affected during spill containment and cleanup activities. During cleanup, some oiled birds could be successfully cleaned, and cleanup of the affected habitat could be necessary to avoid chronic exposure. Nesting or roosting birds in nearby habitats unaffected by the spill could be disturbed by cleanup of contaminated habitats. Coastal cleanup and remediation activities in coastal habitats may impact local populations of coastal birds, resulting in their temporary displacement from these areas. If the abandoned area is an important nesting habitat (especially during the breeding season), local population-level impacts may be incurred. The application of dispersant chemicals to spilled surface oil could also affect birds. While dispersant chemicals contain constituents that are considered to have low levels of toxicity when compared to toxic constituents of spilled oil (Wells 1989), the effects of these dispersants on seabirds are poorly understood. Because the use of these chemicals and spill cleanup activities would be localized and infrequent, potential impacts from spill response activities would largely be short term (e.g., avoidance of the cleanup area).

The specific nature and magnitude of effects of an oil spill on marine and coastal birds of the GOM will depend on the size, location, timing, and duration of the spill and the birds and habitats exposed to the spill. Small spills may be expected to affect relatively small numbers of birds and habitats and would not be expected to cause population-level impacts.

Catastrophic Discharge Event. The PEIS analyzes a CDE with a volume ranging from 900,000 to 7,200,000 bbl (Table 4.4.2-2). A low probability CDE would have similar impacts on bird populations as spills of other magnitudes; however, the area affected would increase and the degree of impact would be more severe. A much greater number of birds and habitats could be affected, and population-level impacts for some species could be incurred as CDEs can affect extensive areas of shoreline. For example, the Gulf Coast Least Tern Colony (see Section 3.8.2.1.4) on the Mississippi coast has one of the world's largest colonies of least tern. A catastrophic discharge event reaching this colony site during the nesting season could foul several thousand nests and result in the loss of an entire reproductive season, the effects of which may cause long-term population effects.

4.4.7.2.2 Alaska – Cook Inlet.

Routine Operations. Oil and gas development that could occur in the Cook Inlet Planning Area following a lease sale under the proposed action would include (1) offshore exploration; (2) construction of offshore platforms and pipelines; (3) construction of onshore pipeline landfalls and pipelines; (4) operations of offshore and onshore facilities; and (5) OCS-

related vessel and aircraft traffic (Table 4.4.1-3). While activities supporting this development may be expected to affect marine and coastal birds in the vicinity of the development activities, these impacts would largely be short term, generally affect only a relatively small number of birds at any one time, and not be expected to result in population-level impacts on any species.

Offshore Exploration. Under the proposed action, oil and gas exploration could include the placement of up to 12 exploration and development wells in the Cook Inlet Planning Area. Seismic surveys and placement and operation of the wells could affect some birds. Disturbance of birds during seismic surveys would be limited to the immediate area around survey vessels, be short term, and be largely behavioral (MMS 2005e). For example, noise from air guns and disturbance from survey vessel traffic could displace foraging seabirds in offshore waters, especially if exploration were to occur in areas with high seabird density (such as the open waters adjacent to the Stevenson and Kennedy Entrances to Cook Inlet and off the northwestern coast of Kodiak Island [see Section 3.8.2.2.4]) where seabirds are likely to be encountered. If disturbed, affected birds would likely cease foraging activities and leave the vicinity to feed in other areas. Because the lease sale would occur no closer than 3 NM from shore, offshore exploration activities (including the placement of exploration and development wells) would not be expected to disturb marine or coastal birds or their habitats (such as seabird colonies or wintering grounds) in coastal areas. Thus, normal offshore exploration activities are expected to have negligible or minor effects on marine and coastal birds, and are not expected to result in any population-level effects for local bird populations.

Construction of Offshore Platforms and Pipelines. Under this proposed action, up to three offshore platforms could be constructed in the Cook Inlet Planning Area. These platforms would likely be constructed outside of the planning area and towed to their final location, and marine and coastal birds could be temporarily disturbed during the transportation and placement of the platforms. Disturbance would likely result in affected birds leaving the immediate area of activity (either the platform location or the transportation route). Because of the small number of platforms, the transient nature of their transport and construction, and their offshore locations being well away from coastal habitats and seabird colonies, any impacts on marine and coastal birds may be expected to be short term, affect relatively few birds, and not result in long-term population-level effects for any species.

In addition to the new platforms, up to 241 km (150 mi) of new offshore pipeline could be constructed following leasing under the proposed action. Pipeline trenching could affect birds in nearshore coastal habitats if trenching occurs in or near foraging, overwintering, or staging areas or near seabird colonies. Trenching may also disturb marine species foraging in offshore waters. For many species, disturbance from pipeline trenching would result primarily in a behavioral response, namely, the short-term abandonment or avoidance of habitats in the immediate area of trenching. Pipeline trenching near seabird colonies could cause adults to abandon nests (at least temporarily) and cease incubating eggs or feeding young, and thereby potentially affecting nesting success. If nests are permanently abandoned, some population-level effects may be incurred by the affected species. Potential impacts could be avoided or minimized by locating pipeline corridors and the landfall away from nesting aggregations (seabird colonies), and by scheduling trenching activities to avoid staging, overwintering, and nesting periods.

Construction of up to 241 km (150 mi) of new offshore pipeline could affect as much as 210 ha (519 ac) of benthic habitat within the Cook Inlet Planning Area and locally affect the availability of foraging habitat for some marine and coastal birds. Because portions of the new pipelines would be in water depths potentially unavailable for most marine and coastal birds, pipeline construction may be expected to have limited effect on the overall availability of foraging habitat for marine and coastal birds. Any impacts on food sources would be localized to the pipeline footprint and are expected to have negligible or minor impacts on local marine and coastal bird populations.

Construction of Onshore Pipelines and Landfalls. Under the proposed action, up to 169 km (105 mi) of new pipeline and possibly one new pipeline landfall could be constructed in onshore areas adjacent to the Cook Inlet Planning Area. Construction of new pipelines would likely be located in the general vicinity of existing oil and gas infrastructure, delivering oil to existing refineries in Nikiski and natural gas to existing transmission facilities in the Kenai area (Table 4.4.1-3). Depending on the proximity of the new onshore pipelines or a new pipeline landfall to existing roads, one or more new access roads could be needed to bring in construction equipment and supplies to the construction areas. The construction of new pipelines would permanently eliminate a relatively small amount of habitat (about 4.9 ha [12 ac], assuming a 30.5-m [100-ft] construction ROW) along the pipeline routes, while construction camps to support onshore construction activities would affect an additional very small amount of terrestrial habitat. Siting new pipelines and facilities away from coastal areas would reduce the amount of marine or coastal bird habitat that could be affected. Potential habitat impacts could be reduced by locating the new pipelines within existing utility or transportation ROWs. Because there are relatively few nesting colonies along the Kenai Peninsula north of Anchor Point (USGS undated), only a few seabird colonies could be affected by onshore construction activities. The disturbance of birds in these colonies could be reduced or avoided by siting any new onshore infrastructure away from colony sites and by scheduling construction activities to avoid nesting periods. Overall, onshore construction activities are expected to affect only a relatively small number of birds and not to result in population-level effects for any affected species.

Operations of Offshore Facilities. During normal operations, birds may be affected by noise and human activities at onshore and offshore facilities and by the presence of the facilities themselves. Noise and human activities (such as normal maintenance) could affect birds moving through Cook Inlet during spring and fall migration, as well as birds moving into nesting, fall molting, or overwintering habitats in the planning area. Affected birds would likely avoid the platforms and nearby habitats. Although operational noise and human activity may cause birds to avoid areas where platforms are located, affected birds would likely select other suitable areas of the planning area. Because of the small number of new platforms (no more than three), the disturbance of birds in offshore waters by operational noise and human activity would be limited to only a few areas around the platforms and is not expected to adversely affect marine or coastal bird populations.

Offshore platforms may pose a collision hazard to birds, especially during migration and/or periods of low visibility. No information is available regarding bird collisions with platforms and other structures in Cook Inlet or elsewhere in Alaskan waters. However, a

reasoned estimate of the potential number of such collisions can be made from information available about potential collisions in the GOM. Annual bird mortality in the northern GOM (a major migratory area with several hundred million migrants estimated to pass through annually) from collisions with offshore platforms has been estimated to average 50 collision deaths per platform per year (Russell 2005). Applying a similar collision mortality rate to development that could occur under the proposed action, about 150 bird collision mortalities might be expected annually for the three new platforms.

Operational Discharges and Wastes. Oil and gas development occurring following a lease sale under the proposed action would result in the generation of drilling fluids and debris (Table 4.4.1-3). Produced water, drilling muds, and drill cuttings generated by development and production wells would be disposed of through down-hole injection. Thus, no impacts on marine and coastal birds from these wastes would be expected under normal operations. In contrast, produced water, drilling muds, and drill cuttings generated by exploration and delineation wells would be discharged at the well sites in compliance with applicable regulations and permits. The discharged materials may contain a variety of constituents (e.g., trace metals, hydrocarbons) that may be toxic to birds. In marine waters, birds could be exposed to these materials by direct contact or through the ingestion of contaminated food items. Birds most likely to be present at well sites are those that forage on invertebrates and fish in offshore waters; these include seabirds such as the alcids (such as the common murre, pidgeon guillemot, and ancient murrelet), gulls and terns (such as the mew gull and Arctic tern), and others.

Upon discharge in accordance with permit specifications, production wastes would be rapidly diluted in the water column (i.e., to ambient levels within several thousand meters of discharge [see Section 4.4.3.2.1]) and dispersed by currents, thus greatly reducing the potential for, and the magnitude of, exposure. If constituents of the discharged materials bioaccumulate or biomagnify, there is a potential for some birds to be exposed through their food. Field studies have shown that the concentrations of trace metals, hydrocarbons, or NORM in the tissues of fishes collected around production platforms are within background levels (Neff 1997a).

Normal operations may be expected to generate a variety of operational wastes, such as waste oils, bilge water on support ships, and sanitary wastes. Hazardous waste materials such as lubricating oils, paint, and industrial cleaners would be controlled and disposed of at licensed onshore facilities. Domestic wastewater and sanitary wastes generated on platforms or support vessels would be treated and then discharged to surrounding waters, where they would be quickly diluted (Section 4.4.3.2.1). Many species of marine birds (such as gulls) often follow ships and forage in their wake on fish and other prey injured or disoriented by the passing vessel. Because there would be up to 3 platforms and no more than three weekly vessel trips, only a relatively small volume of operational wastes would be discharged. Any such discharges would be quickly diluted and dispersed and thus not expected to affect marine or coastal birds that could be following the vessels or visiting waters immediately around the production platform.

Marine and coastal birds may become entangled in or ingest floating, submerged, and beached debris (Ryan 1987, 1990). Because the discharge or disposal of solid debris into offshore waters from OCS structures and vessels is prohibited by the BOEMRE (30 CFR 250.40) and the USCG (MARPOL, Annex V, Public Law 100-220 [101 Statute 1458]), entanglement in

or ingestion of OCS-related trash and debris by marine and coastal birds would not be expected under normal operations.

Vessel and Helicopter Traffic. There could be up to three helicopter trips and three vessel trips each week supporting up to three offshore platforms that could be installed following leasing under the proposed action. Vessel and helicopter traffic could disturb birds in foraging, molting, and staging area habitats as well as in nesting areas (such as seabird colonies) that may occur along the traffic routes. Birds may also be injured as a result of collisions with aircraft. Birds responding to approaching support vessels may be expected to cease normal behaviors and move away from the oncoming vessel; this would have little overall impact on affected birds.

In contrast to ship traffic, helicopter overflights likely have a greater potential for disturbing birds. Both the relatively sudden appearance (compared to an approaching ship) and the noise of helicopter overflights may startle birds, causing them to cease their normal behaviors and flee. The reactions of birds to aircraft overflights will depend on a variety of factors, including the species present, the altitude of the flights, and the frequency of the flights (e.g., see Gladwin et al. 1988; Ellis et al. 1991; Derksen et al. 1992; Miller et al. 1994; Larkin 1996; Delany et al. 1999). Helicopter overflights of open water may startle birds that are resting or foraging on the water surface, causing them to cease normal behavior and possibly try to flee the area. Should birds be disturbed while nesting, nesting success may be affected, especially if the disturbance results in nest abandonment and/or increased nest predation. Alternately, some birds may become habituated to aircraft disturbance. For example, no significant decrease in reproductive success was reported in a thick-billed murre colony located near an airport compared to other thick-billed murres that nested away from the airport (Curry and Murphy 1995). FAA guidelines for helicopter oceanic operations request that pilots maintain a minimum altitude of 213 m (600 ft) while in transit offshore, 305 m (1,000 ft) over unpopulated areas or across coastlines, and 610 m (2,000 ft) over populated areas and sensitive habitats such as wildlife refuges and park properties (FAA 2010).

It is assumed that helicopter support for the new platform would originate from the municipal airport in the Kenai-Nikiski area, north of the Cook Inlet Planning Area, and potential for disturbance of marine and coastal birds would be greatest along the east coast of Cook Inlet in this area and southward into the planning area. This area has several areas that provide important habitat for migrating shorebirds and waterfowl in spring, and some of which provide important overwintering habitat for Steller's eider (Table 3.8.2-2). Although there are no large seabird colonies in this area, small numbers of nesting seabirds could be affected by the overflights. Because of the low amount and transient nature of daily support traffic that might occur under the proposed action, relatively few birds may be expected to be affected by vessel or aircraft traffic, with negligible or minor impacts on affected birds. While disturbance of nesting birds has the potential for moderate impacts, the number of affected birds would likely be very limited, and if seabird colonies are present, the disturbance of nesting birds could be avoided by using flight paths and vessel routes that avoid the colonies.

Potential Effects on ESA-listed Species in the Cook Inlet Planning Area. Normal operations may affect listed bird species in the same manner as non-listed species (i.e., primarily behavioral disturbance). Compliance with ESA regulations and coordination with the NMFS

and USFWS would ensure that lease-specific operations would be conducted in a manner that avoids or greatly minimizes the potential for affecting these species.

The endangered short-tailed albatross, the threatened Steller's eider, and the candidate Kittlitz's murrelet occur in or near the Cook Inlet Planning Area and thus could be affected by oil and gas development in the area. The short-tailed albatross does not breed in or near the Cook Inlet Planning Area, occurring only as an occasional visitor that forages on the continental shelf edge beyond the southern boundary of the planning area (see Section 3.8.2.2.2). The Steller's eider also does not nest in the Cook Inlet Planning Area, but does overwinter in lower Cook Inlet and in the Shelikof Strait. Thus, normal operations would not be expected to affect nesting habitats or reproductive success of either of these species.

Because of its uncommon occurrence in marine waters in and around the Cook Inlet Planning Area, relatively few short-tailed albatross would be expected to be present in areas where seismic exploration, offshore platform and pipeline construction, or OCS vessel and aircraft traffic is occurring. If present, disturbed individuals would likely move to areas away from the OCS activity and not be adversely affected. While it is possible for a bird to collide with an OCS-related aircraft, the combination of the very low number of short-tailed albatrosses that could be present around platforms or along associated flight lines with the very small amount of aircraft traffic supporting only new platforms means that few, if any, birds would be expected to incur collisions with support aircraft or with a platform. While such collisions would likely result in the mortality of the affected individual, population-level effects would not be expected to result from such collisions.

Overwintering flocks of Steller's eider could be temporarily disturbed by seismic exploration and by the construction of offshore platforms and pipelines, if those activities were to occur in or near areas where the birds are overwintering. Overwintering birds may also be disturbed by OCS-related vessel and aircraft traffic. If affected, birds would be expected to move away from oncoming vessels and would not be adversely affected. Overwintering birds may be startled by helicopter overflights and may or may not take flight and flee the immediate vicinity. Some birds could be killed or injured as a result of collisions with platforms or OCS-related aircraft. Because there would only be no more than three new platforms and three flights per week to the platforms by support aircraft, such collisions are not expected, few if any individuals would be affected, and no population-level effects would be expected.

While Kittlitz's murrelet can be found in the Cook Inlet Planning Area, it is present in a very patchy and clumped distribution, preferring areas of heavy glaciation, high turbidity, and partial ice cover (Day et al. 2000b; Van Pelt and Piatt 2003). This species has been reported to be sensitive to excessive noise and human activity (Day and Nigro 1999). Offshore platform or pipeline construction activities occurring near concentrations of this species could result in the short- or long-term displacement of birds from the construction areas. Construction of onshore pipelines and facilities could disturb nesting birds and affect nest sites, although it is unlikely that more than a few individuals would be affected. This species nests on cliffs and scree slopes, in a terrain typically avoided when pipelines are being sited. Long-term platform operations and daily vessel and aircraft traffic may also result in the long-term displacement of birds from platform locations and along frequently used flight line locations. In addition, some individuals

could collide with OCS-related aircraft. Because of the disjunct distribution of this species, exposure to routine operations would be expected to be infrequent and localized.

Accidents. Under the proposed action, no more than one large spill (between 1,700 and 5,000 bbl from either a platform or a pipeline), and as many as 18 small spills (<1,000 bbl) may be expected over the lifetime of the lease. The magnitude and extent of impacts on marine and coastal birds from such spills will be a function of a variety of factors, including (1) the time of year of the spill, (2) the volume of the spill, (3) the habitats exposed to the spill, and (4) the species exposed to the spill or that utilize the impacted habitats. Oil spills from onshore pipelines may affect terrestrial habitats and birds. Because of the lower number of birds that would be present in winter, as well as their more limited winter distribution, a greater number of birds may be expected to be affected by an accidental oil spill in summer than in winter. Birds in areas near habitats that have been affected by oil may also be disturbed during spill cleanup operations. Spill cleanup activities may displace birds from nearby habitats, which, depending on the nature of those habitats (e.g., nesting, molting, staging), could result in reduced reproductive success or survival. In addition, the duration of cleanup activities may preclude birds from using the area for quite some time.

Exposure of eggs and young and adult birds to oil may result in a variety of lethal and sublethal effects, while oil may foul habitats, reducing habitat quality and contaminating foods; these potential effects apply to both non-listed and listed bird species of the Cook Inlet Planning Area. The short-tailed albatross, Steller's eider, and Kittlitz's murrelet may be directly affected by an accidental oil release in the same manner as described for non-listed birds, namely, via direct contact and through the ingestion of contaminated foods. These three species may also be indirectly affected as a result of spill-related impacts on their habitats, which may also be affected during oil spill cleanup activities. Direct exposure of birds or their habitats could result in a variety of lethal and nonlethal effects that may affect survival and reproductive success, potentially resulting in population-level effects on the exposed species (e.g., see Hartung 1995; Piatt and Anderson 1996; Day et al. 1997; Esler et al. 2000; Lance et al. 2001; Golet et al. 2002; Esler et al. 2002). The types of effects that exposed birds could incur are discussed in Section 4.4.7.1.

During ice-free conditions (i.e., summer), accidental spills (especially small ones) may be expected to be quickly diluted (see Section 4.4.3.2.2). In contrast, spills occurring under ice may persist for a longer period of time and be transported by currents to areas much more distant from the site of the accidental spill. Previous modeling of similar size oil spills in Cook Inlet indicate that land segments with the highest chance of contact with an offshore platform or pipeline spill are generally along the western shore of lower Cook Inlet in Kamishak Bay and Shelikof Strait (MMS 2003a). Several areas that provide important habitat to migrating and overwintering birds (see Figure 3.8.2-8 and Table 3.8.2-8), as well as a number of seabird colonies, occur in these areas (USGS undated).

Offshore spills that reach coastal areas may expose species that forage or nest in coastal habitats along Cook Inlet and Shelikof Strait. As discussed in Section 3.8.2.2, these areas support thousands of migrating shorebirds and waterfowl, provide important wintering habitat for Steller's eider, and include numerous seabird colonies. Spills reaching these areas could

directly or indirectly expose adults, eggs, young, and food resources. Because of the large number of Steller's eider that overwinter in coastal areas of Cook Inlet (in the vicinity of Homer Spit and Kamishak Bay) (Larned 2005), an accidental spill reaching wintering areas could expose a large number of birds. This species concentrates in shallow, vegetated nearshore habitats, and spills contacting such areas could locally reduce foraging habitat and food resources and contaminate potential prey. The number of birds affected would depend on the size and location of the spill, the number of birds directly exposed to the spill, and the amount of habitat affected.

Offshore spills in marine waters may also expose migrating seabirds and waterfowl, as well as pelagic seabirds that forage in areas such as the offshore marine waters of Cook Inlet near the Barren Islands (Figure 3.8.2.2-1). The short-tailed albatross is considered to be highly vulnerable to the impacts of oil pollution (King and Sanger 1979). Because this species does not breed in the planning area, accidental spills would not be expected to affect nesting colonies. Because this species is widely dispersed and is only a regular visitor to the marine waters of the planning area, few individuals would be expected to be exposed to an accidental spill, and few individuals would be expected to be disturbed during spill cleanup activities. The exposure of a very small number of short-tailed albatross would not be expected to result in population-level impacts on the species. This species forages in open marine waters, and no specific foraging habitat type or location has been identified as being of prime importance for this species. In the event of an accidental spill, members of this species would likely relocate their foraging activities, with no resulting significant impacts expected. Thus, accidental spills would not be expected to adversely affect foraging habitats and associated prey items available to the short-tailed albatross in the Cook Inlet Planning Area.

Spills may also indirectly affect bird populations by reducing food resources and prey availability in affected habitats. These indirect effects could reduce foraging success and energy assimilation, which may affect growth, survival, and reproductive success. Depending on the species affected, these effects could result in population-level effects. Because of the small number and size of spills assumed for development that might occur under the proposed action (Table 4.4.2-1), widespread exposure and impacts such as those observed for the *Exxon Valdez* oil spill in Prince William Sound are not expected for this alternative.

Because of the preference of Kittlitz's murrelet for glacially influenced habitats and its patchy and disjunct distribution among coastal areas, accidental oil spills would generally not be expected to affect more than a few individuals. A moderate to large spill in a high-use area could, however, result in the oiling of a relatively large number of birds. While the chronic effects of long-term exposure of this species are not known, studies on the effects of the *Exxon Valdez* oil spill on marine birds indicate that while murrelets as a whole are especially vulnerable to and adversely affected by large oil spills, this group recovers within a relatively short time following the initial spill and exposure (Day et al. 1997a,b; Murphy et al. 1997). The greatest potential for population-level impacts would be associated with offshore spills occurring in spring and summer and affecting breeding adults. Because this species nests in terrestrial habitats up to 129 km (80 mi) inland (see Section 3.8.2.2.2), nest sites would not be expected to be affected by offshore spills but could be affected by spills from onshore pipelines. However, because this species nests in habitats such as coastal cliffs, scree slopes, and talus above

timberline, which are typically considered unsuitable and thus are avoided when a pipeline is being sited, nest sites are unlikely to be affected by an onshore oil spill.

Catastrophic Discharge Event. The PEIS analyzes a CDE with a volume ranging from 75,000 to 125,000 bbl (Table 4.4.2-2). A low-probability CDE would have similar impacts on bird populations as spills of other magnitudes; however, the area affected would increase and the degree of impact would be more severe. A much greater number of birds and habitats could be affected, and population-level impacts for some species could be incurred as CDEs can affect extensive areas of shoreline. Such a spill contacting important migratory staging areas for waterfowl and shorebirds could have major adverse effects on a variety of species. Similarly, a catastrophic discharge event reaching wintering areas for waterfowl could have serious population-level effects, especially with the increased difficulty in addressing spills under winter conditions.

4.4.7.2.3 Alaska – Arctic.

Routine Operations. Under the proposed action, a number of facilities could be constructed and operated in offshore and onshore portions of the Beaufort Sea and Chukchi Sea Planning Areas (Table 4.4.1-4). Under the exploration and development scenarios for these two planning areas, it is assumed that development would be limited to the shelf areas of both planning areas and to water depths less than 91 m (300 ft). Because the shelf is relatively narrow in the Beaufort Sea, ranging from 90 km (about 60 mi) in the west to 50 km (30 mi) in the east, oil and gas activities would occur within 200 km (100 mi) of shore. In contrast, the Chukchi Sea Planning Area has a very wide shelf area with water depths less than 91 m (300 ft), and oil and gas activities may occur in areas 200 km (120 mi) or more from shore. Figure 4.4.1-2 shows the locations of historic lease sales in the Beaufort Sea and Chukchi Sea Planning Areas; future lease sales and development may be expected to occur in similar areas. Thus, coastal birds are more likely to be affected by development in the Beaufort Sea Planning Area than in the Chukchi Sea Planning Area following lease sales under the proposed action. Marine and coastal birds could be affected during routine operations at these locations by (1) offshore exploration, (2) construction of offshore platforms and pipelines, (3) construction of onshore pipelines, (4) operation of offshore platforms, (5) operational discharges and wastes, and (6) vessel and aircraft traffic.

Offshore Exploration. During offshore exploration, seismic surveys conducted in offshore areas could affect primarily seabirds, because these are the species most likely to be foraging or otherwise using pelagic open waters areas of the two planning areas. Potentially affected birds may include puffins, murres, auklets, gulls and terns. Noise from air guns and disturbance from survey vessel traffic could displace birds from nearby habitats. These disturbances would be limited to the immediate area around survey vessels, would be short term, and would not be expected to result in adverse impacts on local bird populations.

Construction of Offshore Platforms and Pipelines. Under the proposed action, one to four offshore platforms could be constructed in the Beaufort Sea Planning Area, and one to five in the Chukchi Sea Planning Area (Table 4.4.1-4). Construction of offshore platforms would

likely involve the construction of gravel islands to support drilling operations, and seabirds and waterfowl that utilize offshore waters could be affected by construction of these islands. However, construction of these offshore islands would occur in winter when most species are absent. Thus, construction of offshore platforms would not be expected to affect seabirds or waterfowl.

The exploration and development scenario for the proposed action identifies the construction of many miles of new offshore pipeline in the two planning areas: 48 to 2,422 km (30 to 1,505 mi) for the Beaufort Sea and 40 to 402 km (25 to 250 mi) for the Chukchi Sea. Because pipeline construction would also occur in winter when most species have left the area, few birds would be affected by this construction.

Construction of the offshore gravel islands to support drilling operations would likely use gravel mined from the vicinity of the offshore islands. On the North Slope, gravel is generally extracted from the floodplains of large rivers (Pamplin 1979; BLM 2002). Because the mining of gravel would occur in winter along with other construction activities, gravel mining would not be expected to disturb seabirds, waterfowl, or shorebirds, because these would normally be absent during that time. The winter excavation of gravel could result in the conversion of some riverine floodplain habitats into open water habitats, potentially affecting the distribution and availability of nesting and foraging habitats for some species arriving the following spring after gravel excavation has occurred.

A variety of waterfowl and shorebird species nest in floodplain habitats along the Arctic coast. The extent to which some of these species could be affected by gravel excavation will depend on the specific habitats excavated, the extent of habitat disturbance, and the level of nesting use that the affected habitat typically supported. Because gravel excavation would occur in winter, active nests would not be disturbed. Instead, birds arriving in spring searching for suitable nesting habitat would simply search for other nesting locations. Because the relatively small number of offshore facilities that could be constructed under the proposed action (no more than nine platforms total for the two planning areas) would require a relatively limited amount of gravel, excavation activities (and associated habitat impacts) would likely be limited to a few locations.

Although pipeline trenching would also be carried out in winter when most seabird and waterfowl species are not present, seafloor trenching could locally disrupt benthic invertebrate communities that may serve as food sources for waterfowl during other seasons. The extent to which benthic food sources could be affected and the subsequent impact on waterfowl will depend on the type and amount of benthic habitat that would be permanently disturbed by trenching, the importance of the specific habitats in providing food resources to waterfowl, and the number of waterfowl that could be affected.

Pipeline trenching could disturb as much as 13.5 ha (33 ac) and 567 ha (1,400 ac) of benthic habitat in the Beaufort Sea and Chukchi Sea Planning Areas, respectively. Much of this disturbance would occur in water depths of 30 m (100 ft) or more and thus affect benthic habitats that are largely inaccessible by seabirds and diving ducks. Trenching could, however, affect the egg or larval survival/development (through direct mortality and increased turbidity) of fish

species that will eventually become prey for seabirds (SAFMC 2005). The environmental changes caused by trenching would be temporary and would only affect more sensitive prey species. Thus, pipeline trenching is expected to have limited effects on the overall availability of waterfowl food sources, and any impacts on food sources would be very localized and would not be expected to result in population-level impacts on local seabird and waterfowl populations.

The winter construction would also utilize ice roads to build and access gravel island construction sites during the winter. Ice roads may be constructed over both tundra habitats and frozen ocean habitats. During the construction of ice roads, water from local rivers and lakes would be pumped onto the desired area to build up a rigid surface. Ice roads over frozen ocean habitats would have little effect on most bird species because few species would be present in this season. However, species that do overwinter (such as ptarmigan and snowy owl) may temporarily leave the construction area and move to similar habitats in nearby locations.

Construction of Onshore Pipelines. Under the proposed action, up to 129 km (80 mi) of new onshore pipeline could be constructed in onshore areas adjacent to the Beaufort Sea Planning Area; no onshore pipelines would be constructed in support of new development in the Chukchi Sea Planning Area (Table 4.4.1-4). The construction and operation of up to 129 km (80 mi) of new overland pipelines could disturb coastal and tundra species; it could degrade or eliminate as much as 390 ha (970 acres; assumes 30.5-m [100-ft] pipeline ROW) of potential nesting or post-molting habitat that would be permanently lost within the footprint of the new pipelines, causing birds to select habitats in other locations. Construction camps to support onshore construction activities would temporarily disturb some areas and limit use by birds; this disturbance would be short or long term, depending on the nature and effectiveness of camp abandonment and restoration activities following completion of construction activities. The impacts on potential habitat would be temporary and localized, and birds would likely respond by selecting other areas for nesting or post-molting. Regardless of the duration of the effect, the amount of habitat that would be disturbed would be relatively small and not be expected to affect more than a few birds. Careful pipeline ROW siting to avoid important nesting or post-molting habitats, and avoiding construction during post-molting and staging periods near such habitats, would further reduce the magnitude of any potential effects on local bird populations.

Operations of Offshore Platforms. During normal operations, birds may be affected by noise and human activities at the platforms, as well as by the presence of the platforms themselves. Noise generated during drilling and production activities could affect the use of surrounding waters by birds arriving during spring migration, foraging in surrounding waters during nesting season, and later in the year during fall molting and staging periods. Some species may react by avoiding areas immediately in the vicinity of the platforms, other species may show little avoidance or become acclimated, and still others may be attracted to the offshore platforms. Because of the small number of offshore platforms (no more than nine for both planning areas), the disturbance of birds by operational noise and activity would likely be limited to relatively few individuals and would not be expected to result in population-level effects for any species.

Operational platforms may pose collision threats to migrating and nesting birds alike. Many coastal nesting species travel out to open waters of the shelf to forage, while many species

of waterfowl and seabirds migrate along the shelf in spring and summer (Section 3.8.2.3). While little information is available regarding bird collisions with platforms in the Arctic, annual bird mortality from collisions with offshore platforms in the northern GOM has been estimated to average 50 collision deaths per platform per year (Russell 2005). By applying a similar collision mortality rate to the platforms that would be developed in the Beaufort Sea and Chukchi Sea Planning Areas, a total of 200 annual bird collision mortalities might be expected for the four new platforms in the Beaufort Sea Planning Area, and 250 total annual collision mortalities for the five new platforms in the Chukchi Sea Planning Area. The incidence of bird collisions in the GOM may be much greater than the incidence that could occur in the two Arctic planning areas because of the much greater number of migrants in the GOM. However, some Arctic species such as the murres and puffins) are present in very large numbers (Section 3.8.2.3.1) in some locations along the Arctic coast and exhibit daily migrations between coastal nesting areas and foraging areas as far as 80 km (50 mi) or more offshore, which could increase the potential for encountering offshore platforms.

Operational Discharges and Wastes. Produced water, drilling muds, and drill cuttings generated by development and production wells would be disposed of through down-hole injection. Thus, no impacts on marine and coastal birds from these wastes would be expected under routine operations. In contrast, produced water, drilling muds, and drill cuttings generated by exploration and delineation wells would be discharged at the well sites in compliance with applicable regulations and permits. In marine waters, birds could be exposed to these materials by direct contact or through the ingestion of contaminated food items. Birds most likely to be present at well sites are those that forage on invertebrates and fish in offshore waters; these include seabirds such as the murres and puffins, gulls, and jaegers.

Many species of marine birds (especially gulls) often follow ships and forage in their wake on fish and other prey injured or disoriented by the passing vessel. In doing so, these birds may be affected by discharges of waste fluids (such as bilge water) generated by OCS vessels. The discharge of such wastes from OCS service and construction vessels, if allowed, would be regulated under applicable NPDES permits, and any discharged wastes would be quickly diluted and dispersed and thus not be expected to affect marine birds.

Marine and coastal birds may become entangled in or ingest floating, submerged, and beached debris (Heneman and the Center for Environmental Education 1988; Ryan 1987, 1990). Entanglement may result in strangulation, the injury or loss of limbs, entrapment, or the prevention or hindrance of the ability to fly or swim, and all these effects may be considered lethal. Ingestion of debris may irritate, block, or perforate the digestive tract, suppress appetite, impair digestion of food, reduce growth, or release toxic chemicals (Fry et al. 1985; Dickerman and Goelet 1987; Ryan 1988; Derraik 2002). Because the discharge or disposal of solid debris into offshore waters from OCS structures and vessels is prohibited by the BOEMRE (30 CFR 250.40) and the USCG (MARPOL, Annex V, Public Law 100-220 [101 Statute 1458]), entanglement in or ingestion of OCS-related trash and debris by marine and coastal birds would not be expected under routine operations.

Vessel and Aircraft Traffic. Development occurring under the proposed action could include up to 12 weekly vessel and helicopter trips in the Beaufort Sea Planning Area and as

many as 15 weekly helicopter and vessel trips in the Chukchi Sea Planning Area. The presence of ships and helicopters, as well as noise associated with their passage, can disturb birds and potentially affect feeding, resting, or nesting behavior, and may cause affected birds to abandon the immediate area. Which birds could be affected, the nature of their response, and the potential consequences of the disturbance will be a function of a variety of factors, including the specific routes, the number of trips per day, the altitude of the flights, the seasonal habitats along the routes, the species using the habitats and the level of their use, and the sensitivity of the birds to vessel and aircraft traffic. Traffic near or over heavily utilized feeding or nesting habitats of sensitive species could result in population-level effects, while impacts from traffic in other areas with less sensitive species would largely be limited to a few individuals and would not result in population-level effects. The use of shipping lanes and aircraft routes avoiding sensitive bird areas would greatly reduce or eliminate the potential for vessel and aircraft traffic to cause population-level effects in marine and coastal birds.

Helicopter overflights are generally conducted at low altitudes and have the potential for disturbing birds in onshore and offshore locations (Ward and Stein 1989; Ward et al. 1994; Miller 1994; Miller et al. 1994). FAA guidelines for helicopter oceanic operations request that pilots maintain a minimum altitude of 213 m (600 ft) while in transit offshore, 305 m (1,000 ft) over unpopulated areas or across coastlines, and 610 m (2,000 ft) over populated areas and sensitive habitats such as wildlife refuges and park properties (FAA 2010). The type of response elicited from the birds and the potential effect on the birds will depend in large part on the time of year for the overflights and the species disturbed. Helicopter overflights during spring breakup of pack ice may disturb marine species feeding in open water leads and waterfowl in open coastal waters, causing birds to leave the area. Similarly, overflights in summer could displace waterfowl and seabirds from preferred foraging areas and from coastal nesting or brood-rearing areas such as seabird colonies and the lagoon systems of the Beaufort and Chukchi Seas. Molting and staging waterfowl may temporarily leave an area experiencing helicopter overflights (Derksen et al. 1992), while geese have been reported to exhibit alert behavior and flight in response to helicopter overflights (Ward and Stein 1989; Ward et al. 1994).

While bird strikes are possible, any such events would affect only an occasional individual and not result in any population-level effects. However, the increased energy demand associated with birds leaving foraging or staging areas for other, potentially less favorable areas could result in a lowered fitness of the affected birds. While birds disturbed from nesting or brood-rearing habitats by occasional overflights would be expected to return, birds experiencing frequent overflights may permanently relocate to less favorable habitats (MMS 2002b). In addition, the temporary absence of adult birds may increase the potential for predation of unguarded nests and young (NRC 2003a).

Accidents. Marine and coastal birds could be affected by accidental oil spills from offshore platforms and pipelines, as well as from onshore processing facilities and pipelines. The magnitude and extent of impacts will be a function of a variety of factors, including (1) the time of year of the spill, (2) the volume of the spill, (3) the habitats exposed to the spill, and (4) the species exposed to the spill or that utilize the exposed habitats. Exposure of eggs and young and adult birds to oil may result in a variety of lethal and sublethal effects. Oil moving into coastal and inshore areas may foul habitats, reducing habitat quality and contaminating

vegetation and invertebrate foods. Ingestion of contaminated foods may lead to a variety of lethal and sublethal toxic and physiological effects. Finally, oil spill-response activities may disturb birds in nearby habitats that are unaffected by an oil spill.

Certain species of marine and coastal birds may be more susceptible to contact with spilled oil than others, based on their life histories. For example, diving seabirds and underwater swimmers such as loons and diving ducks may be the most susceptible to offshore spills because of their extensive use of such areas and their relatively long exposure time on the sea surface. In contrast, shorebirds and waterfowl may be most susceptible to spills that reach the beach intertidal zone, coastal lagoons, or inshore wetland habitats where these species forage and raise young. The magnitude of the impact will depend on the size of the spill, the species and life stage when exposed, and the size of the local bird population.

Offshore spills in spring that reach coastal barrier islands and mainland coastal wetland areas may expose common eiders, gulls, and other birds that nest in these habitats along the Beaufort and Chukchi Seas. Some of these areas support large nesting colonies, and direct and indirect exposure of adults, eggs, young, and food resources may adversely affect reproductive success and result in population-level effects on some species.

Offshore spills in spring may also expose migrating seabirds and waterfowl. Exposed individuals may experience lethal or sublethal effects from the exposure. Depending on the species, mortality or subsequent impacts on reproduction could result in population-level impacts on some species. Species with naturally low reproductive rates, such as the long-tailed duck and red-throated loon, may be especially vulnerable to population-level impacts. Because these species have a low reproductive rate that limits natural population growth, the loss of comparatively few individuals could result in more substantive population impacts.

Spring spills contacting shoreline areas have the potential to expose thousands of migrating shorebirds, as well as contaminating nesting and foraging habitats and oiling nests and eggs. Exposure of individuals could result in lethal or sublethal effects, while oiling of nests and/or eggs would reduce reproductive success.

Spills occurring in late summer through autumn and that enter coastal lagoons and delta areas could expose large numbers of waterfowl (loons, tundra swans, king eiders, long-tailed duck) that use these habitats for molting and staging, and potentially result in adverse population-level effects. For example, mortality estimates of long-tailed ducks in the central Beaufort Sea from a hypothetical spill ranged as high as 35%, depending on the amount of oil spilled and the number of birds present (MMS 2003a). A winter spill under the ice could contaminate ice leads that develop during spring breakup, exposing eiders and other waterfowl that use these features while migrating.

Oil spills from onshore pipelines would likely be limited to a much smaller area than would a spill in an offshore location. Those birds exposed could incur a variety of lethal or sublethal effects; however, because relatively few individuals or nests would be expected to be exposed, no population-level impacts would be expected. However, an oil spill from an onshore pipeline that reaches an aquatic habitat such as a stream, wetland, or lake on the Arctic coastal

plain may have greater impacts on shorebirds and waterfowl. Many such aquatic habitats are used by a variety of waterfowl and shorebirds for brood rearing, molting, and staging. Thus, a terrestrial spill reaching such habitats could expose a much larger number of birds than a spill restricted to a terrestrial environment.

Spill cleanup activities may disturb and displace birds from nearby habitats. Depending on the use of those habitats (e.g., nesting, molting, staging), displaced birds could incur reduced reproductive success or survival. In addition, the duration of cleanup activities may not only displace birds currently present but also preclude birds using the area for quite some time. For example, cleanup activities associated with a large spill may involve hundreds of workers and numerous boats, aircraft, and onshore vehicles, operating in the affected area for a year or more. During this time, migrating birds arriving in spring would be expected to bypass habitats that are near areas undergoing active cleanup operations.

Catastrophic Discharge Event. The PEIS analyzes CDEs for the Chukchi Sea and Beaufort Sea Planning Areas with volumes ranging from 1,400,000 to 2,200,000 bbl and 1,700,000 to 3,900,000 bbl, respectively (Table 4.4.2-2). A low-probability CDE would have similar impacts on bird populations as spills of other magnitudes; however, the area affected would increase and the degree of impact would be more severe. A much greater number of birds and habitats could be affected, and population-level impacts for some species could be incurred as impacts of CDEs in this region are prolonged by the cold water and cold air temperatures.

4.4.7.2.4 Conclusion. Routine operations may be expected to affect some birds in each of the planning areas included in the proposed action. The nature and magnitude of effects on birds would depend on the specific location, the timing, and the nature and magnitude of the operation, as well as the species that would be exposed to the operation. For routine Program activities, the primary effects would be the disturbance of birds (and their normal behaviors) by noise, construction and development equipment, and human activity, and habitat loss in areas of infrastructure construction. Birds may also incur injury or mortality as a result of collisions with infrastructure and support vessels. Impacts to birds from routine operations associated with the Program are expected to range from negligible to moderate.

Because birds tend to habituate to human activities and noise, potential impacts for many species associated with such disturbance would be short term and would not be expected to result in population-level effects. This could be especially true in the GOM planning areas, where local bird populations are regularly exposed to noise, construction, and vessel traffic associated with commercial and recreational activities. However, depending on the time of year, construction activities near coastal habitats could disrupt breeding and nesting activities of colonial nesting birds, potentially affecting local populations. In most cases, the disturbance of birds would be short term or transient, and would not be expected to result in population-level effects on affected species.

Construction of pipelines, landfalls, and offshore gravel islands (to support Arctic drilling platforms) would result in the permanent disturbance of habitat within the immediate footprint of the new facilities and gravel excavation areas. Because of the relatively small amount of habitat

that could be disturbed, as well as the limited use of some of the affected habitats (such as deep water benthic habitat), habitat disturbance or loss is expected to have only minor impacts on marine and coastal birds. However, the level of impact that could be incurred by any species will depend on the type of habitats affected and the importance of those habitats to local bird populations. Loss of nesting, molting, or staging habitats (especially in the Alaska Planning Areas) has the potential to affect reproductive success, foraging success, and survival of some species, and may result in population-level impacts on affected species. Careful siting of infrastructure to avoid sensitive and important habitats would greatly reduce or eliminate the potential for population-level effects.

Some mortality may be expected for birds colliding with offshore platforms and, to a lesser extent, with helicopters providing support services to offshore platforms. Impacts from such collisions are anticipated to affect relatively few birds and result in only minor impacts on bird populations, with no population-level effects. Because the discharge of production wastes and other materials generated at offshore platforms and OCS-related vessels is regulated and because permitted production wastes discharged into marine waters would be quickly diluted and dispersed, relatively few birds would be exposed to these waste materials and impacts from such discharges would likely be negligible.

While normal operations could affect listed bird species in the same manner as non-listed species (primarily behavioral disturbance), compliance with ESA regulations and coordination with the USFWS would ensure that lease-specific operations would be conducted in a manner that avoids or greatly minimizes impacts on these species.

Accidental oil spills (and especially those associated with a CDE) pose the greatest threat to marine, coastal, and migratory birds, and could affect both birds and their habitats. Exposed birds may experience a variety of lethal or sublethal effects, including reduced reproductive success. The magnitude and ecological importance of any effects would depend upon the size of the spill, the species and life stages that are exposed, and the size of the local bird population. A spill associated with a CDE would affect the greatest number of species, individuals, and habitats, and have the potential to cause population-level impacts to affected species. Exposure to spills in deep water would be largely limited to pelagic birds, while shallow-water spills could affect the greatest variety and number of birds, including shorebirds, waterfowl, wading birds, gulls and terns. Birds that become heavily oiled by direct contact with a spill would likely perish, while lightly oiled birds may experience a variety of lethal or sublethal effects. Oil washing ashore may contaminate eggs and nest sites, as well as foul foraging areas and food resources.

In the GOM, spills in deep water are not likely to affect listed marine and coastal birds because, with the exception of the roseate tern, none of the seven listed species would be expected offshore where deepwater spills could occur. The roseate tern does not normally frequent waters in close proximity to the Western, Central, and Eastern GOM Planning Area where lease sales and subsequent oil and gas activities may occur under the proposed action. In the Alaskan Planning Areas, only the short-tailed albatross would be expected with any regularity in OCS areas more than 200 km (124 mi) from shore. For the GOM and Alaskan OCS Planning Areas, most of the listed and candidate species could be exposed to shallow-water spills

or to large deepwater spills (especially large or CDE-level spills) that have moved into coastal waters. In coastal areas, most of the listed species could be directly exposed while foraging in oiled flats, beaches, and coastal wetlands. Because all of the wild populations of the endangered whooping crane use limited habitats on the GOM coast (in Texas, Florida, and Louisiana), the entire population of this species may be especially vulnerable to a spill that reaches these locations. In Alaska, the threatened spectacled eider congregates in specific habitats during molting and when staging for fall migration, this listed species may also be particularly vulnerable to population-level effects should a spill contact molting or staging habitats with large numbers of individuals. Similarly, the threatened Steller's eider overwinters in Cook Inlet and a large spill could locally affect a relatively large number of birds. Spills occurring in glacially influenced coastal habitats could expose relatively large numbers of Kittlitz's murrelet, a candidate species for listing under the ESA. This species has been reported to be particularly vulnerable to oil exposure. Because neither the albatross nor the eider breeds in the Cook Inlet Planning Area, accidental spills would not be expected to affect nest sites of these species. While Kittlitz's murrelet breeds in Cook Inlet, it nests on cliffs, scree slopes, and other areas where its nests would not be expected to come in contact with accidental oil spills.

4.4.7.3 Fish

4.4.7.3.1 Gulf of Mexico.

Fish Resources.

***Routine Operations*.** See individual habitat sections for detailed discussions of the impacts of oil and gas activities on fish habitat in the GOM. Potential OCS oil and gas development impacting factors for fish in the GOM are shown by phase in Table 4.4.7-3. Impacting factors common to all phases include platform lighting, increased ship traffic, vessel discharges (bilge and ballast water), and miscellaneous discharges (deck washing, sanitary waste). Impacts from waste discharges would be localized and temporary and are expected to have negligible impacts on fish populations. Many of these waste streams are disposed of on land, and all vessel and platform wastes that are discharged into surface waters must meet USEPA and/or USCG regulatory requirements. Studies conducted in the northern GOM suggest that platform lighting could alter predator-prey dynamics by enhancing phytoplankton productivity around the platform, potentially improving food availability and the visual foraging environment for fishes (Keenan et al. 2007). Potential impacts from platform lighting would be localized but long term and are expected to have minimal impacts on fish populations.

Exploration and Site Development. During the OCS oil and gas exploration and development phase, fish could be affected by noise from seismic surveys and noise and bottom disturbance from drilling, platform placement, and pipeline trenching and placement activities. Releases of drilling muds and cuttings could also affect fish by contaminating food resources in sediments and surrounding surface waters (Table 4.4.7-3).

TABLE 4.4.7-3 Impacting Factors on Fish and Their Habitat in the GOM Planning Areas

Development Phase and Impacting Factor	Life Stage Affected[a]		
	Eggs	Larvae	Adults
Impacting Factors Common to All Phases			
Vessel noise	X	X	X
Vessel traffic	X	X	X
Hazardous materials	X	X	X
Solid wastes	X	X	X
Offshore lighting	X	X	X
Aircraft noise			
Offshore air emissions			
Onshore air emissions			
Aircraft traffic			
Miscellaneous platform discharges	X	X	X
Vessel discharges	X	X	X
Bottom disturbance from vessel anchors	X	X	X
Exploration and Development			
Seismic noise	X	X	X
Noise from drilling and construction	X	X	X
Bottom disturbance from platform placement, drilling, and pipeline placement and trenching	X	X	X
Discharge of drilling muds and cuttings	X	X	X
Production			
Production noise	X	X	X
Produced water discharge	X	X	X
Artificial reef	X	X	X
Decommissioning			
Platform removal (non-explosive)	X	X	X
Platform removal (explosive)	X	X	X

[a] Colors indicate impact level: white = negligible; blue = minor; yellow = moderate; red = major.

All fish species in the GOM are presumed to be able to hear with varying degrees of sensitivity and within the frequency range of sound produced by exploration site development activities. Noises generated during platform and pipeline placement, vessel traffic, and seismic surveys are all potential sources of disturbance to fish communities. Noise could kill or injure fish, induce behavioral alterations, produce generalized stress, and interfere with communication (Smith et al. 2004; Vasconcelos et. al. 2007; see Popper and Hastings 2009 for a recent review). A primary source of noise during exploration and site development would be air guns used during seismic surveys. There is some experimental evidence that noise generated by seismic surveys could kill or injure organisms typically within a few meters of the noise source, but other

studies found no injury or mortality even for sensitive, early life stages (Dalen and Knutsen 1986; Holliday et al. 1987; reviewed in NSF and USGS 2010). Several researchers have also documented startle responses or temporary avoidance of areas exposed air gun noise, but these effects are not found consistently (Turnpenny and Nedwell 1994; reviewed in Popper and Hastings 2009 and NSF and USGS 2010). Continuous long-term exposure to high-pressure sound waves has been shown to cause damage to the hair cells of the ears of some fishes under some circumstances (Popper 2003). Several studies have found that species with gas bladders, which includes many of the pelagic and demersal fish species in the GOM, are more vulnerable to injury or mortality from explosions than species without gas bladders such as flatfish (MMS 2004a). For adult fishes, continuous exposures would not exist under natural circumstances as fish could move from the area. However, fish larvae may suffer greater mortality because of their small size and relative lack of mobility. The severity and duration of noise impacts would vary with site and development scenario, but overall the impacts would be temporary, localized, and minor. A recent review of seismic survey noise on marine fish concluded that although data were limited, there would be no significant impacts on marine fish populations from seismic surveys (BOEMRE 2010c; NSF and USGS 2010).

Bottom-disturbing activities such as coring and drilling, platform placement and mooring, and pipeline trenching and placement would displace fish in the vicinity of the activities. Bottom disturbance would result in temporary sedimentation and increased turbidity, which could damage fish gills and bury benthic invertebrate prey resources within some distance of the disturbance. Fish mortality may also be greater if bottom disturbance occurs in areas of high larval and juvenile fish density such as estuaries and nearshore areas. In addition, the physical changes to benthic habitat resulting from drilling could affect food resources for benthic fishes by altering benthic invertebrate community composition. Soft sediment fishes, particularly in shallow water, are subject to frequent bottom disturbance from human activities such as trawling and natural occurrences such as storms and are presumably well adapted to such conditions.

The discharge of drilling muds and cuttings (including synthetic drilling fluids adhering to the cuttings) can affect fish in several ways. Impacts from turbidity would be similar to those described above and could damage respiratory structures, cause fish to temporarily move from the area, and disrupt food acquisition. Drilling muds and cuttings released near the sediment surface or in shallow water would bury benthic food resources in the release area although conditions would eventually recover. Trace metal and hydrocarbon constituents in drilling fluids can be toxic to all life stages of fishes if exposed to high enough concentrations. Planktonic eggs and larvae that contact the mixing zone would be at greatest risk (e.g., Kingsford 1996), while juveniles and adults passing through a discharge are not likely to be adversely affected. The disturbance would be short, and based on the assumption of a relatively widespread distribution of eggs, larvae, and prey, only a very small proportion of the population of a given fish species is likely to be affected. In addition, all discharges must comply with NPDES permit requirements regarding the discharge amount, rate, and toxicity, which would greatly reduce the impact on fish communities. BOEM-sponsored research on the biological effects of drilling fluids on marine communities in the GOM (Continental Shelf Associates, Inc. 2004, 2006) found that fish densities were elevated near the platforms compared to control locations and certain classes of benthic invertebrate food sources were also more abundant within 300 m (984 ft) of the well compared to control areas (Continental Shelf Associates, Inc. 2006).

There are several protective measures in place to protect sensitive fish habitat from oil and gas activities. Impacts on hard-bottom areas from bottom-disturbing activities would be minimized by the Topographic Features Stipulation that establishes No Activity Zones, where no operations, anchoring, or structures are allowed. There is also a lease stipulation that requires avoidance of low-relief live-bottom and pinnacle features. In deep water, there are stipulations requiring the avoidance of chemosynthetic communities and deepwater corals.

Based on the discussion above, the site development and exploration represent a minor disturbance, primarily affecting demersal fishes, with the severity of the impacts generally decreasing dramatically with distance from bottom-disturbing activities.

Production. Production activities that could affect soft sediment habitat include operational noise, bottom disturbance, and the release of process water. In addition, the platform would replace existing featureless soft sediments and serve as an artificial reef (Table 4.4.7-3).

Chronic bottom disturbance could result from the movement of anchors and chains associated with support vessels and floating platform moorings. Bottom disturbance would affect fish and their food resources in a manner similar to that described above for the exploration and site development phase. Some of the disturbance could be episodic and temporary, but others would last for the lifetime of the platform.

Sessile epifaunal invertebrates requiring hard substrate (i.e., barnacles and corals) as well as small motile invertebrates (amphipods and worms) would colonize fixed or floating platform structures, creating an artificial reef. Pipelines not buried would also provide hard substrate for sessile and structure-oriented fish species. Reef fish and epipelagic fishes such as tunas, dolphin fish, and jacks would be attracted to these platforms in concentrations greater than those of surrounding soft sediments and even natural reefs (Wilson et al. 2003). The platforms could possibly enhance feeding of predators by attracting and concentrating smaller prey species. However, concerns have been expressed that highly migratory species could be diverted from normal migratory routes and consequently from normal spawning or feeding areas because of attraction to structures such as oil platforms (Carney 1997). Similarly, platforms may attract reef fish from natural hard-bottom areas. Thus platforms may simply attract fish rather than increasing fish production and at the same time make them easier to harvest by commercial and recreational fisheries (Brickhill et al. 2005). Because of the wide distribution of reef and epipelagic species and the great number and spatial extent of production platforms, such effects could extend to the regional scale. Ultimately, the benefit or detriment of artificial reefs as habitat depends on how fisheries are managed on the reef and the individual life histories and habitat requirements of the species present (Bohnsack 1989; Macreadie et al. 2011).

Produced water contains several toxic elements (Neff 1997a), and direct and continuous exposure to produced waters can be lethal to all life stages of fishes. Because more chemicals are required to maintain adequate flow in deep waterwells, produced water from deepwater wells is expected to contain more chemical contaminants than wells in shallow water. Direct exposure would occur only in the water column near the discharge point; thus pelagic adults and planktonic eggs and larvae would be most susceptible. Higher impacts would be realized if eggs and larvae were unusually concentrated. Thus, local circulation patterns greatly influence the

degree of potential impact. Nevertheless, population-level effects on fishes are not likely, as contaminants are not expected to reach toxic levels in the sediment and water column because of dilution and NPDES permitting requirements regarding discharge rate, contaminant concentration, and toxicity. In studies of the potential long-term ecological effect of oil and gas development, no significant bioaccumulations of hydrocarbons or metals were observed in fish collected near platforms, and histopathological evaluations of fish found no damage to liver tissue (Peterson et al. 1996). In addition, benthic invertebrate food sources collected in sediments near platforms do not appear to bioaccumulate the common contaminants in produced water, and their tissues did not exceed USEPA-specified concentrations considered harmful (Continental Shelf Associates, Inc. 1997). Organisms attached to oil platforms have not been found to accumulate metals, although they have been found to bioaccumulate organic contaminants (Continental Shelf Associates, Inc. 1997). Produced water discharge has also not been found to contribute significantly to hypoxia in the GOM (Rabalais 2005; Bierman et al. 2007). Thus, production activities are expected to result in minor impacts on fish communities.

Decommissioning. Platform removal in general would temporarily affect fish by displacing resident fishes, disturbing sediments, and increasing noise and turbidity for some length of the water column. In addition, it is assumed that up to 275 platforms would be removed using explosives, which could kill or cause sublethal injury to many of the fishes associated with the structures. Small fish and fish with swimbladders are most susceptible to injury and mortality from underwater blasts. In a study of 792 explosive platform removals in the GOM, an average of 567 dead fish were observed floating at the surface, although the actual number dead is likely to be higher (Continental Shelf Associates, Inc. 2004b). Mark and recapture studies conducted at platform removal sites in the central and western GOM (Gitschlag 2000) estimated that between 2,000 and 5,000 fishes greater than 8 cm (3 in.) in length and more than 6,200 fish less than 8 cm (3 in.) were killed during explosive removals in water depths ranging from 14 to 32 m (46 to 105 ft). Sheepshead, spadefish, red snapper, and blue runner accounted for 89% of the mortality estimated by these studies. Mortality estimates of red snapper associated with the platform ranged from 57 to 90%. Assuming 275 explosive removals, a large number of fish could potentially be killed during the Program. Displaced fish would repopulate the area over a short period of time, although the species composition would likely shift to soft sediment species and away from reef and migratory pelagic species of fish. Overall, decommissioning activities are expected to result in up to moderate effects on fish communities.

If fixed platforms are toppled and left in place, the platform would continue to serve as an artificial reef, although the density and composition of fish may change. For example, the high vertical relief of the platform is important in attracting fish; thus fish density may decline once the platform is toppled (Wilson et al. 2003). Pipelines not buried, in both shallow and deepwater would provide hard substrate and habitat for structure-oriented fishes. As discussed above, the ability of artificial reefs to enhance fish production is controversial. In addition, artificial reefs may allow the spread of non-native fish species across the GOM, especially as waters warm due to climate change (Hickerson et al. 2008). For example, lionfish (*Pterois volitans*) have spread from the reefs of the West Florida shelf to the central and western GOM, where they are often

found associated with oil platforms (http://www.lsu.edu/seagrantfish/biological/invasive/redlionfish.htm). In the future, other species could become established through range expansion or human introductions. Ultimately, the benefit or detriment of artificial reefs as habitat depends on how fisheries are managed on the reef and the individual life histories and habitat requirements of the species present (Bohnsack 1989; Macreadie et al. 2011).

Accidents. Impacts of most accidental hydrocarbon releases on fish and their habitat are expected to be relatively minor, as most spills would be small and hydrocarbons would be diluted and broken down by natural processes. The location of the spill, habitat preference of the fish, and the season in which the spill occurred would be important determinants of the impact magnitude of the spill.

Toxic fractions of PAHs in spilled oil can cause death or illness in adult fishes. Less is known about the impacts of natural gas on fish, but natural gas could have lethal or sublethal impacts as well, depending on concentration. Impacts of hydrocarbons differ among various life stages of fishes. For example, pelagic eggs and larval stages of fish, whose movements are largely controlled by water currents, could be killed if they came into contact with surface oil spills (Patin 1999). Conversely, oil and gas would typically rise above the seafloor, which would limit direct contact with demersal fishes. Evidence also indicates that the majority of adult pelagic fish can likely detect and avoid heavily oiled waters in the open sea, thereby avoiding acute effects (Patin 1999; Roth and Baltz 2000). However, adult fish could still be exposed to sublethal hydrocarbon concentrations through direct contact with gills or through ingestion of spilled oil. In addition, oil could ultimately enter the benthic food web as oil-contaminated pelagic organic matter and biota settled to the seafloor.

Catastrophic Discharge Event. The PEIS analyzes a CDE up to 7.2 million bbl could result from pipeline ruptures, a loss of well control, and from tanker spills associated with an FPSO system (Table 4.4.2-2). At the population level, hydrocarbon spills could affect fish by causing high mortality of eggs, larvae, juveniles, or adults; triggering abnormal development; impeding the access of migratory fishes to spawning habitat; displacing individuals from preferred habitat; reducing or eliminating prey populations available for consumption; impairing feeding, growth, or reproduction; causing adverse physiological responses; increasing susceptibility to predation, parasitism, diseases, or other environmental perturbations; and increasing or introducing genetic abnormalities. Most of the fishes inhabiting shelf or oceanic waters of the GOM have planktonic eggs and larvae (Ditty 1986; Ditty et al. 1988; Richards et al. 1993). Catastrophic spills occurring during recruitment periods or spills that affect areas with high larval fish concentrations such as estuaries could result in population-level impacts. Because of the wide dispersal of early life history stages of most fishes in the GOM, it is anticipated that only a relatively small proportion of early life stages present at a given time would be affected by a particular oil spill event, and this would limit the potential for population-level effects. For example, an evaluation of the response of coastal fishes to the DWH event suggests that large-scale losses of 2010 cohorts were largely avoided and that there were no discernible shifts in species composition following the spill (Fodrie et al. 2011). However, the impact magnitude would also depend on the temporal and spatial scope of the oil spill. Since some species of fish spawn in a limited geographic area(s) during a small temporal window, a spill could have population-level impacts if the spill coincided in time and space with spawning

activity. In addition, fish species such as tuna, swordfish, and other billfish that currently have depressed populations and critical spawning grounds in the GOM could experience major impacts if high numbers of early life stages were killed by a spill.

Protected Species: Gulf Sturgeon.

Routine Operations.

Exploration and Site Development. No information is available on the hearing or acoustic biology of Gulf sturgeon from which to assess effects. The only noise sources strong enough to produce impacts other than behavioral disruption are seismic surveys. Since the seismic sources (air guns) are fired in the upper water column, Gulf sturgeon are unlikely to be injured, but the noise could have behavioral effects such as disruption of feeding and movement behaviors. Adult Gulf sturgeon wintering in shelf waters of the GOM may be affected by sounds emanating from working platforms and their attendant operations. However, the most likely effects would be short-term behavioral disruption or avoidance of certain areas.

The placement of bottom-founded structures during the exploratory drilling phase may affect adult Gulf sturgeon and their designated critical habitat (50 CFR 226.214) directly and indirectly. As with all fish, the drilling platform and pipeline placement could injure or displace Gulf sturgeon and reduce or eliminate their benthic food resources. These disturbances could affect adult Gulf sturgeon during cooler months, which is their primary feeding period of the year when they move from coastal rivers into inner shelf waters of the eastern and central GOM (Huff 1975; Mason and Clugston 1993). However, most new oil and gas production activities would not occur in the shallow coastal waters less than 10 m (33 ft) in depth (67 FR 39106–39199) preferred by Gulf sturgeon. Consequently, only a small proportion of the areas of bottom disturbance would potentially be used by Gulf sturgeon.

Drilling muds and cuttings can be released at or near the sea surface or the seafloor. Muds and cuttings are diluted and dispersed rapidly in the ocean; therefore, cuttings released at the surface are unlikely to have measurable impacts on Gulf sturgeon. However, food resources for Gulf sturgeon may be buried by muds and cuttings released near the seafloor or settling in thick accumulations in shallow water. Gulf sturgeon are known not to have an affinity for structured habitat, and they occur in water shallower than that typically used for drill sites. Thus, accumulations of drilling muds and cuttings are not likely to affect Gulf sturgeon or their habitat.

Production. Produced water discharges dilute rapidly in the open ocean, and direct exposure would occur only in the water column near the discharge point where adult sturgeon are not likely to be located. Vulnerable early life stages of Gulf sturgeon exist only in rivers far removed from produced water discharges, making exposure unlikely. The discharge of produced water is not thought to contribute to significantly increasing the size or severity of the hypoxic zone in the GOM (Rabalais 2005). Consequently, it is believed that discharges resulting from the proposed action will not affect dissolved oxygen levels in areas used by Gulf sturgeon.

Decommissioning. Under the proposed action, it is assumed that explosives would be used to remove up to 275 platforms in the entire GOM. Explosive blasts can be lethal to fishes

that may be present near the structure (Gitschlag 2000). However, the Gulf sturgeon are known not to have an affinity for offshore structures; thus, they are not likely to be affected.

Accidents. Hydrocarbons could affect adult sturgeon by direct contact with gills or via direct ingestion. Adult and juvenile fishes would likely avoid oil from a spill. Eggs and larvae of fishes could die or become deformed if exposed to certain toxic fractions of spilled oil (Longwell 1977; Collier et al. 1996; Kingsford 1996). However, contact with early life stages of Gulf sturgeon is unlikely because floating oil is not likely to penetrate to the middle reaches of most rivers where eggs are deposited and because oil would float on the freshwater outflow and never reach or settle directly on demersal eggs (Sulak and Clugston 1998; Fox et al. 2000).

Protected Species: Smalltooth Sawfish.

Routine Operations.

Exploration and Site Development. Smalltooth sawfish are considered rare from Texas to the Florida panhandle (NMFS 2009) and are not likely to be present in the Central and Western Planning Areas where exploration and site development, production, and decommissioning activities occur. In addition, smalltooth sawfish are livebearers; therefore sensitive egg and larval life stages are not present in the water column, which makes them less susceptible to impacts from exploration and production activities.

Noise from underwater construction and seismic surveys could produce impacts ranging from lethal to sublethal and behavioral (Popper and Hastings 2009). Since the seismic sources (air guns) are fired in the upper water column, smalltooth sawfish are unlikely to be affected. Juvenile smalltooth sawfish occupy shallow estuaries and nearshore areas away from noise-generating oil and gas exploration and development activities. Adult smalltooth sawfish are found in waters up to 122 m (400 ft) or deeper and could be affected by exploration and production noises. However, the most likely effects would be short-term behavioral disruption or avoidance of certain areas.

The placement of bottom-founded structures during the exploratory drilling phase may affect adult smalltooth sawfish and their designated critical habitat (50 CFR 226.214) directly and indirectly. As with all fish, the drilling platform and pipeline placement could injure or displace smalltooth sawfish and reduce or eliminate their benthic food resources. Small juveniles typically occupy shallow estuarine waters and would not be located in the vicinity of most bottom disturbance. However, most new platform and drilling activity would occur at the depth range occupied by large juveniles and adults. Given their size, most adults would likely be able to swim away from bottom-disturbing activities, thereby avoiding injuries. However, foraging habitat would be temporarily eliminated and food resources in the disturbed area may be reduced.

Drilling muds and cuttings can be released at or near the sea surface or the seafloor. Muds and cuttings are diluted and dispersed rapidly in the ocean; therefore, cuttings released at the surface are unlikely to have measurable impacts on smalltooth sawfish. However, food resources for smalltooth sawfish may be buried by muds and cuttings released near the seafloor

or settling in thick accumulations in shallow water. Small juvenile smalltooth sawfish occur in water shallower than that typically used for drill sites and are not likely to be affected.

Production. Vulnerable early life stages of smalltooth sawfish exist only in shallow estuarine areas far removed from produced water discharges, making exposure unlikely. Adults and larger juveniles do occupy coastal waters where produced water discharge would occur. Produced water discharges dilute rapidly in the open ocean, and direct exposure would occur only in the water column near the discharge point where adult sawfish are not likely to be located. The discharge of produced water is not thought to contribute to significantly increasing the size or severity of the hypoxic zone in the GOM (Rabalais 2005). Consequently, it is believed that discharges resulting from the proposed action will not affect dissolved oxygen levels in areas used by smalltooth sawfish.

Decommissioning. Under the proposed action, it is assumed that explosives would be used to remove up to 700 platforms in the entire GOM. Explosive blasts can be lethal to fishes that may be present near the structure (Gitschlag 2000). However, smalltooth sawfish are known not to have an affinity for offshore structures; thus, they are not likely to be affected.

Accidents. Smalltooth sawfish are considered rare from Texas to the Florida panhandle and are not likely to be present in the Central and Western Planning Areas where accidental oil spills would occur. Adult and juvenile fishes would likely avoid oil from a spill, although they could be exposed to sublethal concentrations through aqueous or dietary routes. Smalltooth sawfish are livebearers and the exposure of eggs to hydrocarbons would occur only by adult exposure. Contact with early small juvenile smalltooth sawfish is unlikely unless oil penetrates shallow estuarine areas. However, actively reproducing populations are thought to exist only in south Florida, and therefore small juveniles are not likely to be exposed to oil spills (NMFS 2009).

4.4.7.3.2 Alaska – Cook Inlet.

Routine Operations. Potential OCS oil and gas development impacting factors for fish in the Cook Inlet Planning Area are shown by phase in Table 4.4.7-4. Impacting factors common to all phases include vessel traffic, platform lighting, vessel discharges (bilge and ballast water), and miscellaneous discharges (deck washing, sanitary waste). Impacts from waste discharges would be localized and temporary and are expected to have negligible impacts on fish populations. Many of these waste streams are disposed of on land, and those that are discharged must meet USEPA and/or USCG regulatory requirements that minimize environmental impacts. Studies of platform lighting suggest the lights could alter predator-prey dynamics by enhancing phytoplankton productivity around the platform, potentially improving food availability and the visual foraging environment for fishes (Keenan et al. 2007). Potential impacts from platform lighting would be localized but long term and expected to have minimal impacts on fish populations.

Exploration and Site Development. During the OCS oil and gas exploration and development phase, fish could be affected by noise from seismic surveys and noise and bottom

TABLE 4.4.7-4 Impacting Factors on Fish and Their Habitat in the Cook Inlet Planning Area

	Life Stage Affected[a]		
Development Phase and Impacting Factor	Eggs	Larvae	Adults
Impacting Factors Common to All Phases			
Vessel noise	X	X	X
Vessel traffic	X	X	X
Hazardous materials	X	X	X
Solid wastes	X	X	X
Offshore lighting	X	X	X
Aircraft noise			
Offshore air emissions			
Onshore air emissions			
Aircraft traffic			
Miscellaneous platform discharges	X	X	X
Vessel discharges	X	X	X
Bottom disturbance from vessel anchors	X	X	X
Exploration and Development			
Seismic noise	X	X	X
Noise from drilling and construction	X	X	X
Bottom disturbance from platform placement, drilling, and pipeline placement and trenching	X	X	X
Discharge of drilling muds and cuttings	X	X	X
Production			
Production noise	X	X	X
Produced water discharge	X	X	X
Artificial reef	X	X	X
Decommissioning			
Platform removal (non-explosive)	X	X	X

[a] Colors indicate impact level: white = negligible; blue = minor; yellow = moderate; red = major.

disturbance from drilling, platform placement, and pipeline trenching and placement activities (Table 4.4.7-4).

Noise disturbance from drilling, construction, and seismic surveys could potentially kill, injure, or displace fish depending on the magnitude of the noise, fish size, and distance from the noise source. Seismic survey data are usually collected by discharging compressed air from arrays of air guns towed behind ships. All fish species in Cook Inlet are presumed to be able to hear, with varying degrees of sensitivity, within the frequency range of sound produced by exploration and site development activities. The effects of air gun discharges on fishes depend on the fish life history stage and biology, distance to and type of the sound source, and the

magnitude of the explosion. Noise generated by seismic surveys could kill or injure organisms typically within 1 to 5 m (3 to 16 ft) of the air gun or cause some species to temporarily avoid the area (Turnpenny and Nedwell 1994; Popper and Hastings 2009). Noise might also produce generalized stress (Smith et al. 2004) and interfere with communication (Vasconcelos et al. 2007). Several studies have found that species with gas bladders (e.g., salmonids, coregonids, and gadids) are more vulnerable to injury or mortality from explosions than species without gas bladders such as flatfish (MMS 2004a). The juvenile and adult fish in Cook Inlet likely to be affected by the noise generated from seismic surveys include salmon, cod, whitefishes, and herring. Continuous, long-term exposure to high-pressure sound waves has also been shown to cause damage to the hair cells of the ears of some fishes under some circumstances (Popper and Hastings 2009). For adult fishes, continuous exposures would not exist under natural circumstances, as fish could move from the area. However, fish larvae may suffer greater mortality because of their small size and relative lack of mobility. In a confined area such as Cook Inlet, noise from seismic surveys can also alter fish behavior. For example, disruption of normal behaviors during critical spawning and feeding periods in spring and summer has the potential to adversely affect survival and reproduction. The severity and duration of noise impacts would vary with site and development scenario, but overall the impacts would be temporary. Recent reviews of seismic survey noise on marine fish concluded that although data were limited, significant impacts on marine fish populations from seismic surveys were not likely (BOEMRE 2010c; National Science Foundation and USGS 2010).

Bottom-disturbing activities such as coring and drilling, platform placement and mooring, and pipeline trenching and placement would displace fish in the vicinity of the activities and result in temporary sedimentation and turbidity, which could damage fish gills and bury benthic invertebrate prey resources within some distance of the disturbance. Fish mortality may be greater if bottom disturbance occurred in areas of high larval and juvenile fish density such as estuaries and nearshore areas. The migrations of anadromous species common in Cook Inlet such as Pacific salmon and eulachon could also be disrupted. Soft sediments in Cook Inlet are subject to frequent bottom disturbance from high discharge and storms and Cook Inlet waters are naturally high in suspended sediments. Thus, fish communities in Cook Inlet are presumably well adapted to such conditions.

It is assumed that drilling muds and cuttings would be discharged into Cook Inlet for exploration wells only, while drilling wastes from development and production wells would be reinjected into the wells. The discharge of drilling muds and cuttings (including synthetic drilling fluids adhering to the cuttings) can adversely affect fish in several ways. Impacts from turbidity associated with drilling waste discharge would be similar to those described above and could damage respiratory structures, cause fish to temporarily move from the area, and disrupt food acquisition. Drilling wastes released near the sediment surface or in shallow water would bury benthic food resources in the release area, although conditions would eventually recover. Trace metal and hydrocarbon constituents in drilling fluids can be toxic to fish at all life stages if they are exposed to high enough concentrations. Impacts would be greatest for planktonic eggs and larvae that contact the mixing zone, while juveniles and adults passing through a discharge are not likely to be adversely affected. Based on the assumption of a relatively widespread distribution of eggs, larvae, and prey in Cook Inlet, drilling waste discharge is not likely to alter the population dynamics of fisheries resources in Cook Inlet or the Gulf of Alaska. In addition,

drilling discharges must comply with NPDES permit requirements regarding the discharge amount, rate, and toxicity, which would greatly reduce the impact on fish communities.

While an exact route cannot be determined at this time, any onshore pipeline route would be required to comply with various Alaska Coastal Management Program policies. As a consequence, construction activities in sensitive aquatic habitat would be minimized. Specifically, the route for onshore pipeline facilities would be sited inland from shorelines and beaches, and crossings of anadromous fish streams would be minimized and consolidated with other utility and road crossings of such streams. In addition, onshore pipelines would be designed, constructed, and maintained to minimize risk to fish habitats from a spill, pipeline break, or construction activities.

Overall, site development and exploration activities represent a minor and temporary disturbance primarily affecting demersal fishes, with the severity of the impacts generally decreasing dramatically with distance from the disturbance.

Production. Production activities that could affect fish communities in Cook Inlet include operational noise, bottom disturbance from anchors and the release of process water. In addition, the platform would replace existing featureless soft sediments and serve as an artificial reef (Table 4.4.7-4).

Chronic disturbance to demersal fish communities could result from the movement of pipelines and anchors and chains associated with support vessels. Bottom disturbance would affect fish in a manner similar to that described above for the exploration and site development phase. The disturbance would be episodic and temporary, but would last for the lifetime of the platform.

Produced water contains metals, hydrocarbons, salts, and radionuclides, and their discharge could contaminate habitat, resulting in lethal and sublethal effects on fish, particularly early life stages. However, NPDES permitting requirements regarding discharge rate, contaminant concentration, and toxicity would greatly reduce the potential for impacts on fish. It is assumed that all produced water would be disposed of by injection into permitted disposal wells. Therefore, the effects of produced water discharges on fish are expected to be minimal.

Platforms would add a hard substrate to the marine environment, providing additional habitat for marine plants and animals (e.g., kelp and mussels) that require a hard substrate. Fish species in Cook Inlet that prefer hard substrate, such as rockfish, may be attracted to platforms. The platform would likely increase shell material and organic matter in the sediments surrounding the platform, potentially resulting in a shift in benthic invertebrate food sources.

A two-year (1997–1998) study of contaminant levels in the sediments of the Shelikof Strait and Cook Inlet provide information on potential effects of oil and gas development in the Cook Inlet Planning Area (MMS 2001a). Samples of sediment from depositional areas (where sediment contamination is expected to be greatest) suggested that metals and PAHs in sediments derived primarily from natural sources rather than past oil and gas developments (MMS 2001a). In addition, sediment concentrations of metals and organic contaminants in outermost Cook Inlet

and Shelikof Strait (1) have not increased significantly since offshore oil exploration and production began in Cook Inlet (circa 1963) and (2) posed only minor risks to benthic biota or fish (MMS 2001a). Consequently, it is expected that production activities would have negligible effects on fish communities in Cook Inlet.

Decommissioning. No explosive platform removals are anticipated under the proposed action. Nonexplosive removals (e.g., abrasive, mechanical, or diver cutters) would have negligible long-term impacts to fish populations, although individuals associated with the platform would experience a loss of habitat. Pipelines installed and anchored on the seafloor would be capped and left in place, although there is the potential for chronic sediment disturbance from pipeline movement. If fixed platforms are left in place, the changes to fish communities resulting from the initial platform installation would be permanent. Overall, impacts on fish populations associated with decommissioning activities are expected to be negligible.

Accidents. Accidental hydrocarbon releases in Alaska may have greater ecological consequences than in temperate areas because oil is likely to persist in the environment due to the colder temperatures. Hydrocarbons can have a range of effects on fish depending on the concentration, the length of exposure, and the life history stage of the fish involved (Starr et al. 1981; C.I. Hamilton et al. 1979; Malins 1977; Neff and Stubblefield 1995). Prolonged exposure to elevated levels of petroleum hydrocarbons can result in lethal or sublethal (reproduction, recruitment, physiology, growth, development, and behavior) impacts at the level of the individual, while catastrophic oil spills could result in population-level effects in some cases (Peterson et al. 2003). Fishes most likely to be affected by an oil spill would be those that migrate extensively (e.g., arctic cisco and salmon), those with high fidelity to natal streams (e.g., Dolly Varden), and those confined to nearshore environments (e.g., broad whitefish and rainbow smelt). Gas and particularly oil releases in Cook Inlet could affect fish populations by causing mortality of eggs, larvae, juveniles, or adults; triggering abnormal development; impeding the access of migratory fishes (e.g., salmon and herring) to spawning habitat; altering behaviors; displacing individuals from preferred habitat; reducing or eliminating prey populations available for consumption; impairing feeding, growth, or reproduction; causing adverse physiological responses; increasing susceptibility to predation, parasitism, diseases or other environmental perturbations; and increasing or introducing genetic abnormalities. It is anticipated that pelagic eggs and larval stages of fish, whose movements are largely controlled by water currents, would be killed if they came into contact with surface oil spills (Patin 1999). Conversely, evidence indicates that the majority of adult pelagic fish can likely detect and avoid heavily oiled waters in the open sea, thereby avoiding acute effects (Patin 1999). Adult salmon are able to return to natal streams and hatcheries even under very large oil spill conditions (Brannon et al. 1986; Nakatani and Nevissi 1991), as evidenced by the return of pink and sockeye salmon to Prince William Sound and sockeye salmon to Cook Inlet during and after the *Exxon Valdez* oil spill.

Impacts from spills would be greatest if a large spill occurred during a reproductive period or contacted a location important for spawning or growth such as intertidal and nearshore subtidal habitats. However, it is anticipated that only a small amount of shoreline would be affected by these smaller oil spills and would not, therefore, present a substantial risk to fish

populations. Most small hydrocarbon releases would be rapidly diluted and are expected to primarily affect fish in the water column, as most oil and gas would float above the sediment surface. Because pelagic species of fishes in Cook Inlet are relatively abundant and widely distributed in waters across much of the central Gulf of Alaska, even a large oil spill (up to 4,600 bbl) is not likely to cause population-level impacts on most fish populations inhabiting the central Gulf of Alaska (i.e., South Alaskan Peninsula, Kodiak Archipelago, Shelikof Strait, Cook Inlet, and Prince William Sound).

Catastrophic Discharge Event. The PEIS analyzes a CDE of 75 to 125 thousand bbl in the Cook inlet Planning Area. The likelihood of oil from a CDE (Table 4.4.2-2) contacting part of the shoreline is relatively high because the Cook Inlet Planning Area is located within a relatively confined estuary. Spilled oil affecting nearshore and intertidal areas would likely result in the greatest impacts on fisheries resources. Oil may persist for years in intertidal areas and could represent a persistent source of exposure for fish such as herrings that generally spawn near shorelines. Oil spills in intertidal areas also have the potential to contaminate or alter the composition and abundance of benthic food resources. For example, evidence from the *Exxon Valdez* oil spill suggests stress-tolerant invertebrates such as polychaetes and snails would not suffer long-term population declines in oiled areas, but clams and mussels could be contaminated and reduced in abundance for several years (*Exxon Valdez* Oil Spill Trustee Council 2010c). A catastrophic oil spill and/or multiple smaller spills could result in a decline in local abundances of fish stocks or subpopulations, with recovery potentially requiring multiple generations. Some stocks are already in decline due to non-OCS anthropogenic and natural impact-producing factors (e.g., commercial fisheries, climatic shifts).

Some of the potential effects that catastrophic oil spills in Cook Inlet could have on fish resources can be inferred based upon the impacts of the 1989 *Exxon Valdez* oil spill, which released approximately 257,000 bbl of oil into nearby Prince William Sound. The potential effects of the Valdez spill are best known for salmon and Pacific herring. Population-level effects on salmon were primarily through exposure of eggs and larvae to oil in sediments. Because of their long incubation period in intertidal gravel and because salmon embryos have a large lipid-rich yolk that can accumulate hydrocarbons from low-level exposures, salmon embryos are vulnerable to contamination from oil spills that reach intertidal areas (Peterson et al. 2003). For example, pink salmon embryos in oiled intertidal streams of Prince William Sound continued to show higher mortality than those in non-oiled streams until 1993 (Bue et al. 1998), and from 1989 to 1990, the growth rates of cutthroat trout and Dolly Varden in oiled streams were lower than those in clean streams (Hepler et al. 1993). However, salmonid populations appeared to recover within 15 years. Pink and sockeye salmon populations were considered to have recovered in 1999 and 2002, respectively (*Exxon Valdez* Oil Spill Trustee Council 2010c). Dolly Varden char were considered recovered in 2002, and cutthroat trout are considered to have very likely recovered (*Exxon Valdez* Oil Spill Trustee Council 2010c).

Although the *Exxon Valdez* oil spill occurred a few weeks before Pacific herring spawned in Prince William Sound, adult herring appeared to be relatively unaffected by the spill. About half of the herring egg biomass was deposited within the oil trajectory, and toxicity tests suggested egg-larval mortality in the oiled areas was twice as great as in the non-oiled areas and that larval growth rates in oiled areas were depressed compared to those in areas unaffected by

the spill (Brown et al. 1996; McGurk and Brown 1996). After a record harvest in 1992 (following the *Exxon Valdez* spill), the Pacific herring population in Prince William Sound collapsed and has remained depressed, with reduced or no commercial harvest allowed. The Pacific herring stock of Prince William Sound is still classified as "not recovered" from the *Exxon Valdez* oil spill (*Exxon Valdez* Oil Spill Trustee Council 2010c). However, because of natural variability in population and confounding environmental factors, there has not been full consensus among researchers that the currently low herring numbers are fully attributable to the effects of spilled oil. Pathogens, rather than lingering effects of the Valdez spill, may be primarily responsible for the lack of recovery (*Exxon Valdez* Oil Spill Trustee Council 2010c).

Although the effects of the spill on rockfish, a common demersal fish in Cook Inlet, were never well understood, their populations and habitat are considered recovered from the *Exxon Valdez* spill (*Exxon Valdez* Oil Spill Trustee Council 2010c). In general, adult demersal fishes are believed to avoid oil slicks, although individuals in coastal shallow waters with slow water exchange could be exposed to sublethal hydrocarbon concentrations (Patin 1999). A large or catastrophic spill could adversely affect hundreds of millions of eggs and juvenile stages, especially spills that reach nearshore areas, which are important to many species of demersal fishes as juveniles (Moles and Norcross 1998). Adult demersal and bentho-pelagic fish, including pollock, sablefish, Pacific cod, eulachon, and Pacific sand lance, would probably not be harmed by spilled oil at the surface. However, many demersal fishes such as walleye pollock, halibut, and cod all have buoyant eggs and larvae that float near the surface where they could be exposed to spilled oil (NPFMC 2010).

4.4.7.3.3 Alaska – Arctic.

Routine Operations. Potential OCS oil and gas development impacting factors for fish are shown by phase in Table 4.4.7-5. Impacting factors common to all phases include vessel traffic, platform lighting, vessel discharges (bilge and ballast water), and miscellaneous discharges (deck washing, sanitary waste). Impacts from waste discharges would be localized and temporary and would be expected to have negligible impacts on fish populations. Many of these waste streams are disposed of on land, and any discharges into surface waters must meet USEPA and/or USCG regulatory requirements before discharge. Studies of platform lighting suggest that the lights could alter predator-prey dynamics by enhancing phytoplankton productivity around the platform, potentially improving food availability and the visual foraging environment for fishes (Keenan et al. 2007). Potential impacts from platform lighting would be localized but long term and are expected to have minimal impacts on fish populations.

Exploration and Site Development. During the OCS oil and gas exploration and development phase, fish could be affected by noise from seismic surveys and noise and bottom disturbance from drilling, subsea well, gravel island, and platform placement, and pipeline trenching and placement activities (Table 4.4.7-5). The effects of these activities on fish communities are described in detail in Section 4.4.7.3.2.

Fish in the Beaufort Sea and Chukchi Sea Planning Areas most likely to be affected by the noise generated from drilling, vessel traffic, and seismic surveys include salmon, cod,

TABLE 4.4.7-5 Impacting Factors on Fish and Their Habitat in the Beaufort Sea and Chukchi Sea Planning Areas

	Life Stage Affected[a]		
Development Phase and Impacting Factor	Eggs	Larvae	Adults
Impacting Factors Common to All Phases			
Vessel noise	X	X	X
Vessel traffic	X	X	X
Hazardous materials	X	X	X
Solid wastes	X	X	X
Offshore lighting	X	X	X
Aircraft noise			
Offshore air emissions			
Onshore air emissions			
Aircraft traffic			
Miscellaneous platform discharges	X	X	X
Vessel discharges	X	X	X
Bottom disturbance from vessel anchors	X	X	X
Exploration and Development			
Seismic noise	X	X	X
Noise from drilling and construction	X	X	X
Bottom disturbance from drilling and placement of subsea wells, platforms, and pipelines	X	X	X
Discharge of drilling muds and cuttings	X	X	X
Production			
Production noise	X	X	X
Produced water discharge	X	X	X
Artificial reef	X	X	X
Decommissioning			
Platform removal (non-explosive)	X	X	X

[a] Colors indicate impact level: white = negligible; blue = minor; yellow = moderate; red = major.

whitefishes, and herring. The effect on the overall fish population would be negligible since fishes are distributed over wide geographic areas and air gun operations are localized (Section 4.4.7.3.2). While it is anticipated that there would be no permanent population-level effects on managed species from seismic surveys, individual fish, especially egg and larval life stages in close proximity (1 to 5 m [3 to 16 ft]) to air gun arrays (Dalen and Knutsen 1986; Holliday et al. 1987; Turnpenny and Nedwell 1994), could suffer mortality or injury, and adult fishes more distant from the noise could exhibit short-term avoidance and behavioral alteration. A recent review of seismic survey noise on marine fish concluded that although data were limited, there would be no significant impacts on marine fish populations from seismic surveys (BOEMRE 2010c; National Science Foundation and USGS 2010).

Development and construction activities that could affect fish in the Beaufort and Chukchi Sea Planning Areas include drilling, installation of pipelines and construction of subsea wells, platforms, artificial islands, and ice roads. Bottom disturbance would result in temporary sedimentation and turbidity, which could damage fish gills and bury benthic invertebrate prey resources within some distance of the disturbance. Individual fish would likely temporarily move away from affected areas (Section 4.4.7.3.2). The total area affected by seafloor disturbance under the proposed action would be relatively small compared to the availability of similar seafloor habitat in surrounding areas.

Onshore, up to 129 km (80 mi) of oil pipeline could be constructed. While an exact route cannot be determined at this time, the pipeline route would be required to comply with various Alaska Coastal Management Program policies. As a consequence, construction activities in sensitive aquatic habitats would be minimized. Specifically, the route for onshore pipeline facilities would be sited inland from shorelines and beaches, and crossings of anadromous fish streams would be minimized and consolidated with other utility and road crossings of such streams. In addition, onshore pipelines would be designed, constructed, and maintained to minimize risk to fish habitats from a spill, pipeline break, or construction activities.

It is assumed that drilling muds and cuttings would be discharged into the Beaufort and Chukchi Sea Planning Areas for exploration wells only and that drilling wastes from development and production wells would be reinjected into the wells. The discharge of drilling muds and cuttings (including synthetic drilling fluids adhering to the cuttings) can adversely affect fish in several ways. Impacts from turbidity associated with drilling waste discharge would be similar to those described above and could damage respiratory structures, cause fish to temporarily move from the area, and disrupt food acquisition. Drilling wastes released near the sediment surface or in shallow water would bury benthic food resources in the release area, although conditions would eventually recover. Trace metal and hydrocarbon constituents in drilling fluids can be toxic to fish at all life stages if they are exposed to high enough concentrations. Impacts would be greatest for planktonic eggs and larvae that contact the mixing zone, while juveniles and adults passing through a discharge are not likely to be adversely affected. Assuming a relatively widespread distribution of eggs, larvae, and prey in the Beaufort and Chukchi Seas, drilling waste discharge is not likely to alter the population dynamics of fisheries resources. In addition, drilling discharges must comply with NPDES permit requirements regarding the discharge amount, rate, and toxicity, which would greatly reduce the impact on fish communities.

Overall, site development and exploration activities represent a minor and temporary disturbance primarily affecting demersal fishes, with the severity of the impacts generally decreasing dramatically with distance from the disturbance.

Production. Production activities that could affect fish communities in the Beaufort and Chukchi Seas include operational noise, bottom disturbance from anchors and the release of process water. In addition, the platform would replace existing featureless soft sediments and serve as an artificial reef (Table 4.4.7-5). Chronic disturbance to demersal fish communities would result from the movement of anchors and chains associated with support vessels. Pipelines not buried would be anchored in place which would minimize their movement and

potential to disturb fish habitat. Bottom disturbance would affect similar to that described above for the exploration and site development phase. The disturbance would be episodic and temporary, but would last for the lifetime of the platform.

Artificial islands would increase the diversity of habitat available on an otherwise homogeneous ocean. Specifically, such construction would introduce an artificial hard substrate that opportunistic benthic species, especially those that prefer gravel substrate, could colonize. Fishes may be attracted to the newly formed habitat complex, and fish population numbers in the immediate vicinity of the platforms are likely to be higher than in surrounding waters away from the structures. The overall change in habitat could result in changes in local community assemblage and diversity (Howarth 1991). The number of platforms projected for the Beaufort and Chucki Sea Planning Areas under the proposed action (up to nine) would create a small amount of hard substrate habitat and would likely have little effect on overall fish populations.

Produced water contains metals, hydrocarbons, salts, and radionuclides, and their discharge could contaminate habitat, resulting in lethal and sublethal effects on fish, particularly early life stages. It is assumed that all produced water would be disposed of by injection into permitted disposal wells. Therefore, the effects of miscellaneous and produced water discharges on fish communities are expected to be minimal.

The results of the Arctic Nearshore Impacts Monitoring in the Development Area study funded by BOEM provide a good summary of the long-term changes to benthic communities resulting from oil and gas development in the Arctic. Hydrocarbons are primarily derived from river inputs rather than oil and gas development (Brown 2005; Neff and Associates LLC 2010). Tissue hydrocarbon and metals concentrations in fish and their invertebrate food sources sampled near the Northstar development and Liberty prospect area were similar to or lower than invertebrate tissue levels found elsewhere in the world. No increase in hydrocarbons and metals in fish or invertebrate tissues was attributable to oil and gas production (Neff and Associates LLC 2010).

Overall, production activities would result in negligible and temporary effects on fish communities in the Beaufort and Chukchi Sea Planning Areas.

Decommissioning. No explosive platform removals are anticipated under the proposed action. Nonexplosive removals (e.g., abrasive, mechanical, or diver cutters) would have negligible long-term impacts to fish populations, although fish associated with the platform would experience a loss of habitat. Pipelines installed and anchored on the seafloor would be capped and left in place, although there is the potential for chronic sediment disturbance from pipeline movement. Overall, impacts on fish populations associated with decommissioning activities are expected to be negligible.

Accidents. Most accidental hydrocarbon releases would be small and rapidly diluted and are expected to primarily affect fish in the water column, as most oil and gas would float above the sediment surface. Impacts from spills would be greatest if a large spill occurred during a reproductive period or contacted a location important for spawning or growth such as intertidal and nearshore subtidal habitats. However, it is anticipated that in most cases only a small

amount of shoreline would be affected by these smaller oil spills and would not, therefore, present a substantial risk to fish populations. Most small hydrocarbon releases would be rapidly diluted and are expected to primarily affect fish in the water column, as most oil and gas would float above the sediment surface. Because pelagic species of fishes in the Beaufort and Chukchi Sea Planning Areas are widely distributed, even a large oil spill (up to 4,600 bbl) is not likely to cause population-level impacts on most fish populations.

Catastrophic Discharge Event. The PEIS analyzes a CDE of 1.4 to 2.2 million bbl in the Chukchi Sea and 1.7 to 3.9 million bbl in the Beaufort Sea (Table 4.4.2-2). A CDE (Table 4.4.2-2) has the potential to affect multiple species in the Arctic Planning Areas. Such spills can have a range of effects on fish depending on the concentration, the length of exposure, and the life history stage of the fish involved (Starr et al. 1981; Hamilton et al. 1979; Malins 1977; Neff and Stubblefield 1995). During the spill, adult and juvenile fish may be temporarily displaced, which could interfere with movements to feeding, overwintering, or spawning areas. Fish eggs, larvae, and juveniles are the most sensitive life history stages (Section 4.4.7.3.2). Spilled petroleum hydrocarbons may persist for years (Howarth 1991; Wiedmer et al. 1996), especially in sediments of cold waters, making it likely that some fish species would be exposed to low levels of hydrocarbons for an extended time after an oil spill. Similarly, petroleum hydrocarbons could remain available for uptake and bioaccumulation by benthic food sources for years following a spill (Howarth 1991).

Among the most abundant marine fish in the Beaufort and Chukchi Sea Planning Areas are arctic cod, sculpin, eelpout, pricklebacks, and flatfish. Of these, the arctic cod may be the most susceptible to lethal hydrocarbon effects because the larvae are pelagic and most likely to come into contact with oil and gas, which tend to float on the surface. Arctic cod are also susceptible because they are dependent on algal production in open water and under sea ice, which could be affected by oil and gas exposure. Among the most abundant anadromous species are the arctic and least cisco, broad whitefish, Dolly Varden, and rainbow smelt. Fishes most likely to be affected by an oil spill would be those that migrate extensively (e.g., Arctic cisco), those with high fidelity to natal streams (e.g., Dolly Varden), and those confined to nearshore environments (e.g., broad whitefish and rainbow smelt). Some pelagic species (e.g., Pacific herring; capelin) spawn in intertidal zones where their eggs may be susceptible to oil (Rice et al. 1984). Herring generally spawn near shorelines over 3–4 week periods, and oil driven onshore could contact spawning adults and developing eggs (MMS 1996a). Larval herring are also susceptible after moving into deeper water because they rise diurnally to feed on plankton and could be exposed to surface oil repeatedly if a spill occurs. Demersal fishes such as walleye pollock, halibut, and cod all have buoyant eggs and larvae that float near the surface where they could be exposed to spilled oil (MMS 1996a).

A CDE spill could have population-level consequences if vital habitat areas were affected or if it occurred in spawning areas or juvenile feeding grounds when fish populations are highly concentrated (e.g., the Arctic cisco population concentrated near the Colville River). In such cases, catastrophic spills could cause substantial reductions in population levels for one or more years. However, no permanent impacts on fish populations are expected. See Section 4.4.7.3.2 for a detailed discussion of oil spills on fish following the catastrophic *Exxon Valdez* spill.

4.4.7.3.4 Conclusion. The primary potential impacts on fish communities from Program activities could result from seismic surveys and bottom-disturbing activities such as drilling, platform placement and mooring, and pipeline trenching and placement, which could displace, injure, or kill fish in the vicinity of the activity. Fixed platforms, particularly the large number projected for the GOM, would also serve as artificial reefs that would attract substantial numbers of fish. Oil and gas activities would be temporary, and no permanent or population-level impacts on fish are expected. Displaced fish and invertebrate food sources would repopulate the area over a short period of time in the GOM, but fish habitat recovery may be long term in Alaskan waters. The effects of drilling muds and produced water discharge on fish would be localized, and no population-level effects are expected. Drilling waste and produced water discharge would be far less in Alaska because fewer wells would be drilled in Alaska and because it is assumed that drilling muds and cuttings from production wells and all produced water would be reinjected into the wells. Overall, impacts to fish from routine Program activities are expected to range from negligible to minor, and no impacts on threatened or endangered fish species are expected.

Small spills would be localized and are unlikely to affect a substantial number of fish before dilution and weathering would reduce concentrations of toxic fractions to nontoxic levels. Large and especially CDE-level spills would affect a wider area, with the magnitude of the impacts depending on the location, timing, and volume of spills, distribution and ecology of affected fish species, and other environmental factors. Most adult fish are highly mobile and would likely avoid lethal hydrocarbon exposures, although they may be subjected to sublethal concentrations. Smaller species and egg and larval life stages are more likely to suffer lethal or sublethal exposures from oil contact because of their relative lack of mobility. Under most circumstances, any single large or CDE spill would affect only a small proportion of a given fish population; therefore, overall population levels may not be affected. However, fish species that currently have depressed populations or have critical spawning grounds present in the affected area could experience population-level impacts. Oil contacting shoreline areas used for spawning or providing habitat for early life stages of fish could result in large-scale lethal and long-term sublethal effects on fish. In Alaskan waters, where oil may be slow to break down, coastal oiling could measurably depress some fish populations for several years especially if the spill were very large (such as a CDE spill). However, no permanent impacts on fish populations are expected.

4.4.7.4 Reptiles

4.4.7.4.1 Routine Operations. The discussion of impacts to reptile species from OCS oil and gas development is primarily focused on sea turtles that may occur throughout the GOM. There is the potential for other reptile species to be affected from a small number of impacting factors related to OCS oil and gas development. Additional reptile species (e.g., American crocodile) will be identified as impacting factors are discussed in this PEIS.

There are five species of sea turtle that may be encountered in the GOM OCS Planning Areas: green, hawksbill, Kemp's ridley, leatherback, and loggerhead. All of these species have

the potential to occur throughout the planning areas as hatchlings, juveniles, and adults. All but the hawksbill have been reported to nest on beaches within the GOM Planning Areas, and the number and distribution of nests differ dramatically among these species across bordering States (Section 3.8.3; Figure 3.8.3-1). Sea turtles may be affected in all phases of OCS oil and gas development. Under the proposed action, one or more of the sea turtle life stages could be affected under routine operations due to (1) airborne and underwater noise, (2) offshore structure placement and pipeline trenching, (3) removal of offshore structures, (4) OCS vessel traffic, (5) construction and operation of onshore infrastructure, and (6) exposure to operational discharges and wastes. In addition, reptiles may be affected by unexpected and accidental spills of oil and other contaminants. Table 4.4.7-6 illustrates how each of the various impact factors associated with OCS oil and gas development may affect sea turtles and their habitats in the GOM. Many of these impacting factors could occur during multiple project phases. Conceptual models illustrated in Figures 4.4.7-6 through 4.4.7-10 show how various activities associated with seismic surveys, onshore and offshore construction, normal O&G operations, decommissioning, and accidental oil releases may impact sea turtles. While OCS O&G projects have the potential to affect sea turtles of all life stages, it has been determined that impacts to later life stages (large juveniles and adults) result in greater population-level impacts (Crouse et al. 1987).

As discussed in Section 3.3.1, climate change in the GOM is expected to affect coastal systems through processes such as warming temperatures, changes in precipitation, sea level rise, and more frequent intense storms. Rising water temperatures, increased sea levels, and intense storms may affect the availability and suitability of foraging and nesting habitats for coastal and marine reptiles (Hawkes et al. 2009). For reptiles that rely on temperature to determine the gender of offspring in incubating eggs (referred to as temperature-dependent sex determination), including sea turtles and crocodilians, subtle increases in atmospheric temperatures could skew sex ratios of hatchlings, which could have future population implications (Walther et al. 2002). It is also predicted that global warming and increased precipitation rates associated with climate change will cause sea levels to rise (Church et al. 2001). This phenomenon could alter sea turtle coastal habitat in many areas (Hawkes et al. 2009). For example, a study in Hawaii predicted that as much as 40% of green sea turtle nesting habitat could be affected with a 0.9 m (2.7 ft) sea level rise (Baker et al. 2006).

Noise. Hearing sensitivity includes the hearing threshold (the minimum sound level that an animal can perceive in the absence of significant background noise) and the hearing bandwidth (the range of frequencies that an animal can hear). There is very little published data on sea turtle hearing sensitivities, but the little available data suggests that sea turtle species exhibit best hearing at low frequencies 200–700 Hz (BOEMRE 2010c), with an upper hearing limit of 1,600 Hz (Dow et al. 2008). Reported hearing thresholds are also of low frequency, estimated to be between 50 and 1,000 Hz (Tech Environmental, Inc. 2006). Threshold detection levels for these species over this frequency range are relatively high (>100 dB referenced to 1 micropascal within 1 meter of the source [dB re 1 µPa-m]) (Tech Environmental, Inc. 2006).

Potential responses to noises generated during normal operations may be expected to be behavioral and may include avoidance of the noise source, disorientation, and disturbance of normal behaviors such as feeding. Evidence suggests that sea turtles may be affected by seismic

TABLE 4.4.7-6 Potential OCS Oil and Gas Development Impacting Factors for Reptiles in the GOM

	O&G Impacting Factor								
	Noise								
Resource Receptor Category Potentially Affected	Seismic Exploration	Construction, Operation, and Decommissioning	Collisions with OCS Vessels	Presence of OCS Vessels	Construction and Decommissioning of Onshore and Offshore Infrastructure	Offshore and Onshore Lighting	Produced Water, Drill Cuttings and Mud, Liquid Wastes, Hazardous Materials	Solid Wastes and Debris	Accidental Oil Spills
Sea turtle nest sites – individual nests and nesting beaches	–	–	–	–	Destruction of nests; degradation or loss of nesting beaches	–	–	–	Physical disturbance and reduced quality from fouling
Sea turtle hatchlings	Injury; disruption of normal behavior (feeding, nesting)	Disruption of normal behavior (feeding, nesting)	Injury of mortality from ship strikes	Disruption of normal behavior (feeding, nesting)	Injury; disruption of normal behavior	Attraction of reproductive adults to low quality nesting habitats	Toxicity	Ingestion and/or entanglement	Fouling, toxicity
Sea turtle juveniles					Injury; disruption of normal behavior	Attraction of reproductive adults to low quality nesting habitats			Fouling, toxicity
Sea turtle adults					Injury; disruption of normal behavior	Attraction of reproductive adults to low quality nesting habitats			Fouling, toxicity
Sea turtle migration	Displacement or impediment	Displacement or impediment	–	Displacement or impediment	Displacement or impediment	Attraction of reproductive adults to low quality nesting habitats	–	–	Displacement or impediment
Sea turtle juvenile foraging habitats	–	–	–	–	Temporary habitat disturbance during construction; possible long-term increase in habitat	Attraction of reproductive adults to low quality nesting habitats	Reduced habitat quality	–	Physical disturbance; reduced habitat quality
Sea turtle adult foraging habitats	–	–	–	–	Temporary habitat disturbance during construction; possible long-term increase in habitat	Attraction of reproductive adults to low quality nesting habitats	Reduced habitat quality	–	Physical disturbance; reduced habitat quality

TABLE 4.4.7-6 (Cont.)

Resource Receptor Category Potentially Affected	O&G Impacting Factor								
	Noise								
	Seismic Exploration	Construction, Operation, and Decommissioning	Collisions with OCS Vessels	Presence of OCS Vessels	Construction and Decommissioning of Onshore and Offshore Infrastructure	Offshore and Onshore Lighting	Produced Water, Drill Cuttings and Mud, Liquid Wastes, Hazardous Materials	Solid Wastes and Debris	Accidental Oil Spills
Sea turtle wintering grounds	–	–	–	–	Temporary habitat disturbance; possible long-term increase in habitat	Attraction of reproductive adults to low quality nesting habitats	Reduced quality	–	Physical disturbance; reduced quality
American crocodile nest sites, adults, juveniles, hatchlings, and their habitat	–	–	–	–	–	–	–	–	Fouling, toxicity; physical disturbance; reduced habitat quality

[a] – = No impact anticipated.

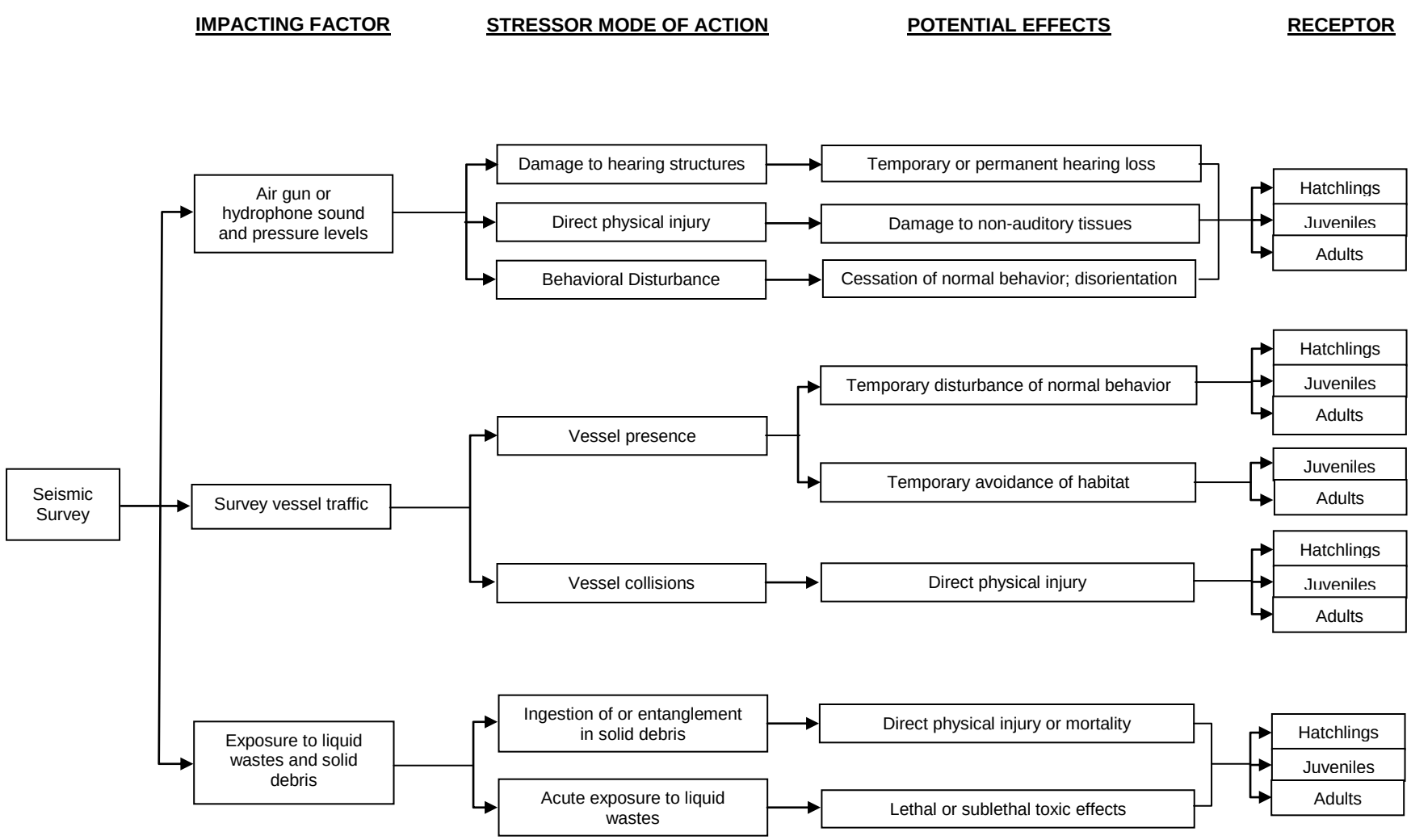

FIGURE 4.4.7-6 Conceptual Model for Potential Effects of Seismic Survey Activities on Turtles in the GOM

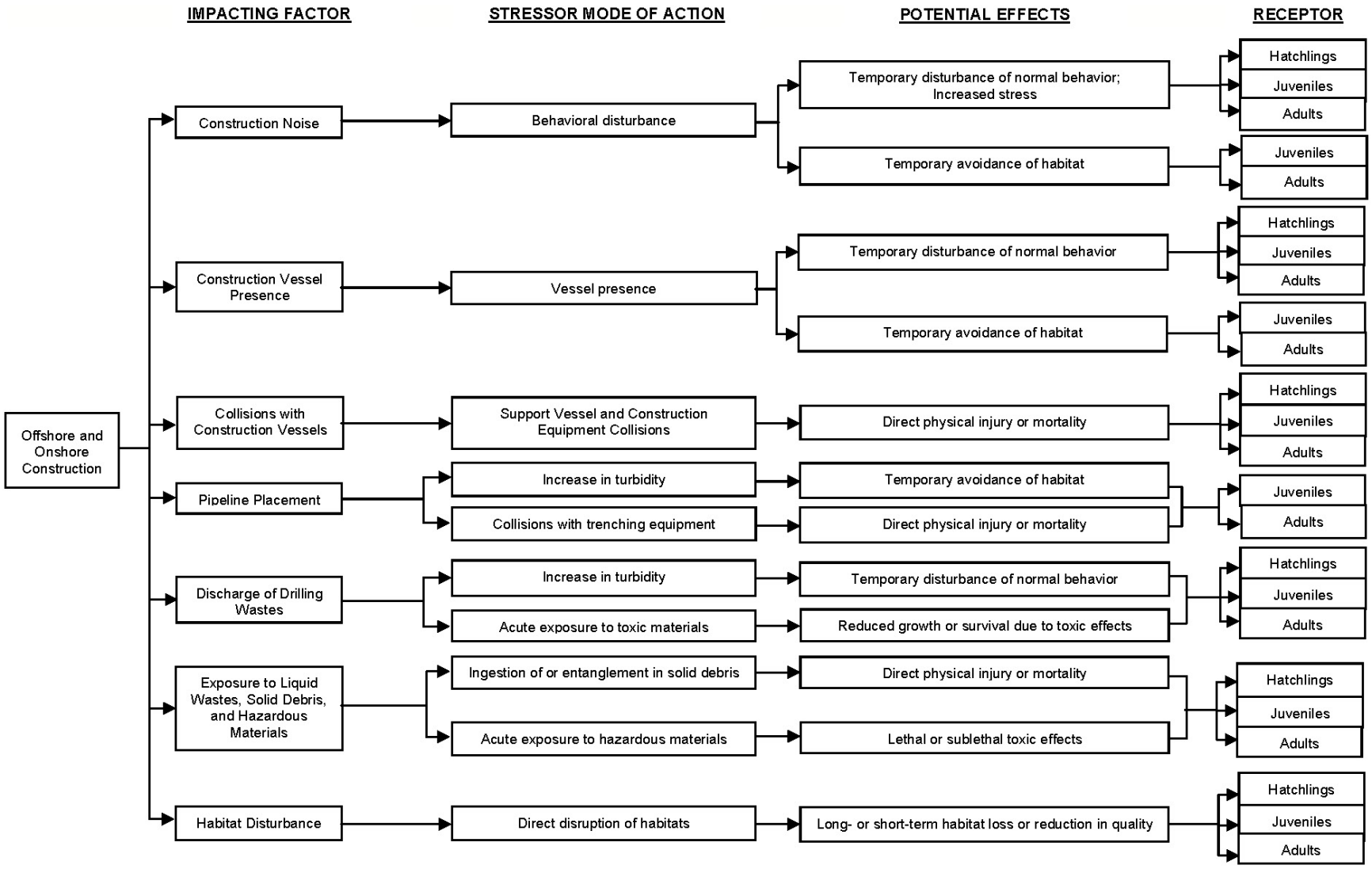

FIGURE 4.4.7-7 Conceptual Model for Potential Effects of OCS-Related Construction Activities on Turtles in the GOM

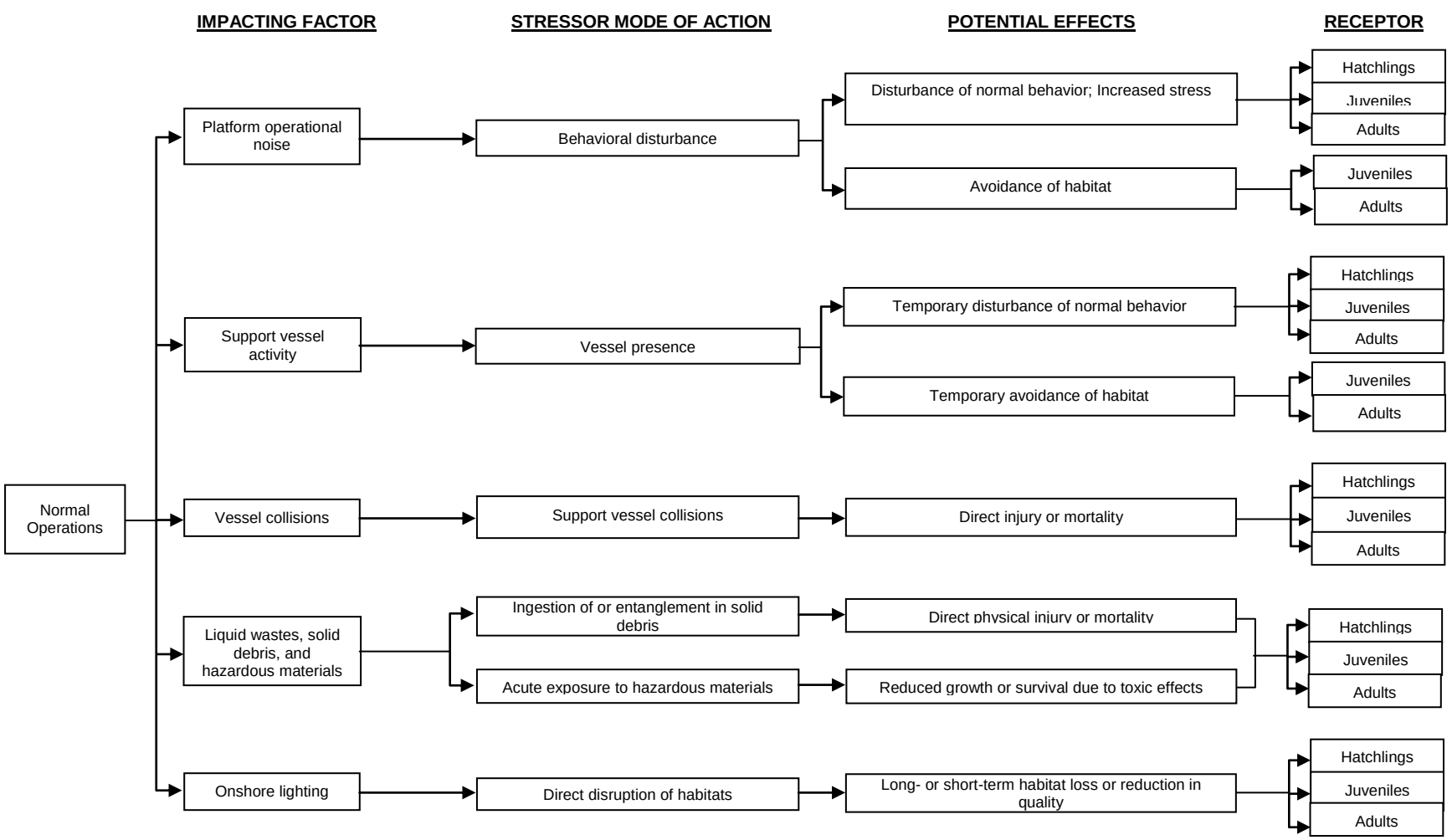

FIGURE 4.4.7-8 Conceptual Model for Potential Effects of OCS Operation on Turtles in the GOM

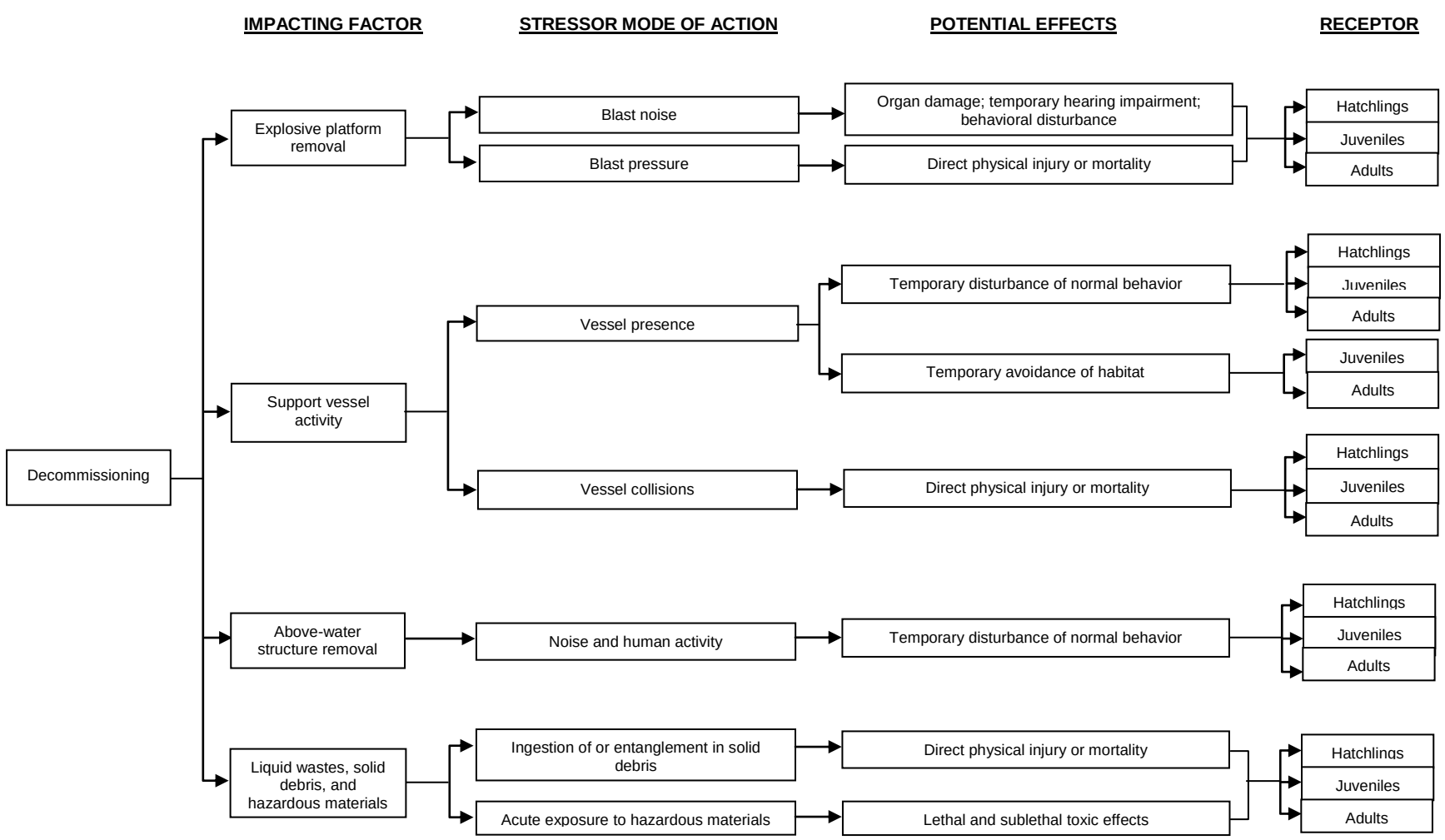

FIGURE 4.4.7-9 Conceptual Model for Potential Effects of Platform Decommissioning on Turtles in the GOM

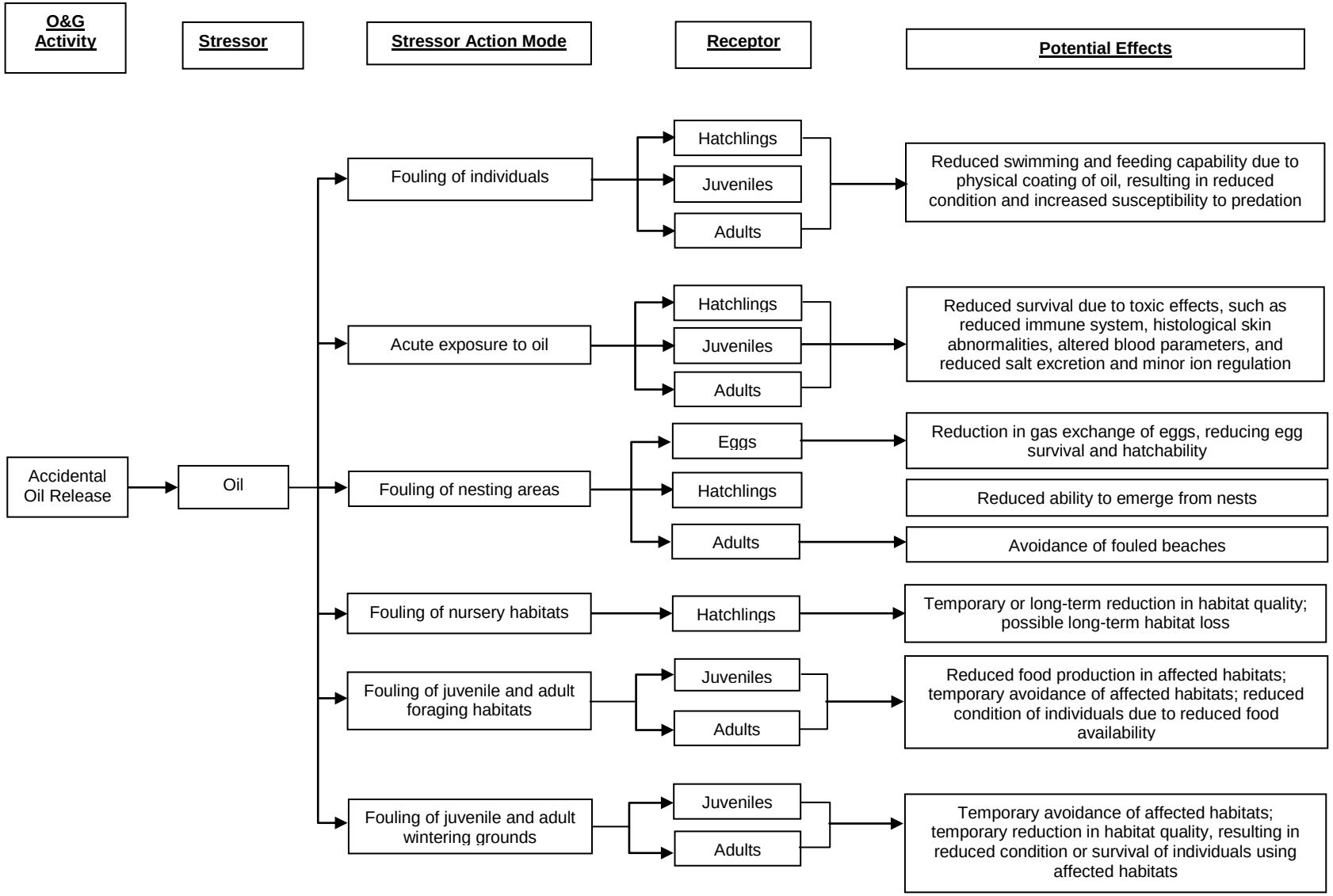

FIGURE 4.4.7-10 Conceptual Model for Potential Effects of Oil Spill on Reptiles in the GOM

noises (McCauley et al. 2000; BOEMRE 2010c; NSF and USGS 2010), but it is largely unknown how sea turtles may respond to and be affected by noise generated during structure placement, drilling and production, pipeline trenching, vessel traffic, and explosive structure removal (Geraci and St. Aubin 1987). Because some sea turtles, such as the loggerhead, may be attracted to OCS structures, these may be more susceptible to sounds produced during routine operations.

Noise generated by seismic surveys may affect sea turtles (Figure 4.4.7-6). Seismic surveys generate both high-frequency and low-frequency noise at levels up to 250 dB re 1 µPa-m, with emitted energy levels in the low-frequency range of 10–120 Hz (IACMST 2006). These survey noises are expected to be detected by sea turtles. Table 4.4.7-7 provides a general summary of available information on the effects of exposure to seismic noises (e.g., sonar) on sea turtles. It has been suggested that sound levels above 175 dB re 1 µPa-m induce behavioral reactions in sea turtles. Air guns and pingers typically used in seismic surveys have nominal source outputs ranging from 192 to 265 dB re 1 µPa-m. Therefore, depending on the species of turtle, its age class, and proximity to the acoustic source, there is potential for air gun blasts to affect sea turtle behavior. Currently, the effects of seismic noise on sea turtle physiology are unknown (BOEMRE 2010c; NSF and USGS 2010; Table 4.4.7-7).

Offshore drilling and production structures produce a broad array of sounds at frequencies and levels that may be detected by sea turtles within the area of the installation (Geraci and St. Aubin 1987). These sounds are generally of relatively low frequencies, typically 4.5–30 Hz, and may be generated at sound levels up to 190 dB re 1 µPa-m. Helicopters and service and construction vessels may affect sea turtles due to machinery noise and/or visual disturbances (NRC 1990). The effects of noise generated from construction and operations are illustrated in Figures 4.4.7-7 and 4.4.7-8.

Underwater explosions associated with the explosive removal of offshore facilities may generate noises that disturb sea turtles (Figure 4.4.7-9; MMS 2005d). Underwater explosions associated with the explosive removal of offshore facilities may generate sound levels in excess of 267 dB re 1 µPa-m. Exposure criteria developed by the U.S. Navy (as cited in Frankel and Ellison 2005) to evaluate the potential for impacts of impulsive sounds (i.e., underwater detonations) on marine biota include a sound level of 182 dB re 1 µPa-m. Using this criterion, a sea turtle may be affected if exposed to a sound level that exceeds 182 dB re 1 µPa-m. Depending on the size of the charges used in an explosive detonation, the surrounding water depth, and the distance to the nearest sea turtles, individual turtles in the vicinity of the facility undergoing explosive removal may be exposed to sound at or above this level. Based on responses reported for marine mammals, sea turtles exposed to explosive noise may experience temporary hearing loss as well as behavioral changes (NRC 2003c, 2005). Behavioral responses may include avoidance of the noise source, disorientation, and disturbance of normal behaviors such as resting or feeding. Turtles may also sustain organ or tissue damage when exposed to explosive noise (Klima et al. 1988).

In advance of explosive severance activities, BOEMRE and NOAA fisheries have implemented protocols to detect the presence of sea turtles within a 1,000-yard radius around decommissioning sites through observer programs operated by vessels, platforms, and

TABLE 4.4.7-7 Summary of Known and Anticipated Effects of Seismic Noise on Sea Turtles in the GOM

Species	Masking	Disturbance	Temporary Hearing Impairment	Injury	Other Physiological Effects	Comments
Green	Unknown	Possible – Short-term	Possible if close to high-energy acoustic source	Unknown	Unknown	Potential for limited adverse effects due to frequency overlap between seismic source and green sea turtle hearing, based on airborne sounds not measured behaviorally (Ridgway et al. 1969; Bartol and Ketten 2006; Dow et al. 2008)
Hawksbill	Unknown	Possible – Short-term	Possible if close to high-energy acoustic source	Unknown	Unknown	No studies available
Kemp's ridley	Unknown	Possible – Short-term	Possible if close to high-energy acoustic source	Unknown	Unknown	Potential for limited adverse effects due to frequency overlap between seismic source and juvenile Kemp's ridley sea turtle hearing (Bartol and Ketten 2006)
Leatherback	Unknown	Possible – Short-term	Possible if close to high-energy acoustic source	Unknown	Unknown	Potential for limited adverse effects due to frequency overlap between seismic source and leatherback vocalizations (Mrosovksy 1972)
Loggerhead	Unknown	Possible – Short-term	Possible if close to high-energy acoustic source	Unknown	Unknown	Potential for limited adverse effects due to frequency of seismic source and a study indicating that loggerheads avoided low-frequency sound (O'Hara and Wilcox 1990)

Source: 2010 Marine Seismic Research PEIS (NSF and USGS 2010, Table 3.4-5).

helicopters. Since 1987, these observer programs have documented takes of four sea turtles (all loggerheads) in the GOM as a result of explosive severance. Of these four takes, one animal was killed, one stunned, and two injured (MMS 2005d). BOEMRE continues to require these mitigation measures (see Appendix F of MMS 2005d) and, with compliance, expects these requirements to reduce the potential for negative impacts to sea turtles from explosive removals.

Noise related to exploration, construction vessel passage, and facility removal may be expected to be transient, while noise generated during production may be more long-term. The dominant source of noise from vessels is propeller operation, and the intensity of this noise is largely related to ship size and speed. Vessel noise resulting from O&G activities in the GOM is expected to occur at low levels, generally 150 to 170 dB re 1 µPa-m at frequencies below 1,000 Hz. Vessel noise is transitory and generally does not propagate at great distances from the vessel. Also, available information suggests that sea turtles are not thought to rely on acoustics; the effects to sea turtles from vessel noise are discountable (NMFS 2007).

As few studies on sea turtle hearing sensitivities or noise-induced stress exist, a full understanding of physical and behavioral impacts from sounds generated during exploration, normal operations, and explosive facility removal is not available. Experiments using air guns to try to repel turtles to avoid hopper dredges have been inconclusive (O'Hara and Wilcox 1990; Moein et al. 1995), while sea turtles exposed to an operating seismic source of 166 dB re 1µPa-m were shown to increase their swimming speed in response to the sound (McCauley et al. 2000). In addition, BOEM has implemented mitigation measures for seismic surveys in the GOM requiring ramp-up, protected species observer training, visual monitoring, and reporting for all surveys potentially affecting marine mammals and sea turtles (MMS 2004b). These measures were developed in consultation with NOAA fisheries, and with operator compliance, they are expected to reduce the potential for impacts to sea turtles.

Offshore Structure Placement and Pipeline Trenching. The placement of offshore structures and pipeline trenching may affect hatchling, juvenile, and adult sea turtles in two ways (Figure 4.4.7-7). Individuals coming in contact with construction or trenching equipment may be injured or killed; construction and trenching activities may also temporarily affect habitat use as habitats may experience short-term and long-term changes in abundance and quality.

During placement, pipelines are placed on or in the seafloor to connect offshore platforms with onshore facilities (MMS 2001b). Burial of pipelines using equipment such as jetting sleds physically digs a trench in the bottom sediment and results in a temporary, localized increase in turbidity. This increased turbidity may temporarily affect habitat use by sea turtles, with sea turtles avoiding such areas. Increases in turbidity from trenching at any particular location may be expected to be short-lived, as jet sleds can lay pipe at an average of 1.6 km/day (1 mi/day) (MMS 2001b). While some turtles may alter their use of habitats in the vicinity of a pipeline, affected turtles would likely return to these areas following a return to more normal turbidity levels and experience little adverse affect from any temporary avoidance of the area.

Because hatchlings are not strong swimmers and undergo passive transport by ocean currents, it is unlikely that they would be able to avoid or leave areas where pipeline trenching or structure placement is occurring, and, if present during offshore construction or trenching, they

could be injured or killed. In contrast, juvenile and adult sea turtles are active swimmers, and thus may be able to avoid areas where construction or trenching is occurring. Sea turtles have been known to be killed or injured during dredging operations (Dickerson 1990; Dickerson et al. 1992), and thus may also be affected during trenching activities. Juveniles or adults may also be affected if the placement of new structures occurs in foraging or developmental habitats or offshore of nesting beaches (see Section 3.6.4.1 for a discussion of these habitats and areas). Following several years out in open water as growing hatchlings, juvenile sea turtles move into nearshore habitats for further growth and maturation. Adults also utilize nearshore habitats for feeding and may mate in nearshore habitats directly off nesting beaches. In addition, females may become residents in the vicinity of nesting beaches. Offshore construction and trenching may reduce the quality or availability of foraging habitat for juveniles and adults, and may affect adult nesting behavior or access to nest sites. It is assumed that habitats such as seagrass beds and live-bottom areas commonly used by turtles for feeding or resting would be avoided during facility siting and pipeline routing, and that some soft-bottom areas affected by construction or trenching would recover (see Section 4.4.6.2.1).

Based on exploration and development (E&D) scenario estimates (Section 4.4.1.1), up to 2,100 exploration wells and 2,600 production wells may be constructed and up to 12,000 km (7,500 mi) of new pipeline may be installed among the GOM planning areas under the proposed action. At any single location, construction and trenching activities would be of relatively short duration (only until the offshore structure or pipeline is in place). Thus, any impacts incurred from structure placement or trenching would be short-term and localized to the construction area and immediate surroundings and, therefore, would likely affect relatively few juveniles or adults. Because they are passively aggregated by currents, a greater number of hatchlings may be affected if present in a construction or trenching area. However, these effects are not expected to result in population-level impacts.

Removal of Offshore Structures. Sea turtles are known to be attracted to offshore platforms (Lohoefener et al. 1990); therefore, they may be killed or injured during explosive platform removal (Klima et al. 1988; Gitschlag and Herczeg 1994). Even if turtles are not capable of hearing the acoustic properties of an explosion, physiological or behavioral responses (startle) to detonations may still result (MMS 2007b). The effects of blast pressure on sea turtles during explosive platform removal activities are illustrated in Figure 4.4.7-9. Exposure to explosion pressure could result in internal injuries, such as lung hemorrhaging, and individuals may be rendered unconscious by the force of the blasts (Duronslet et al. 1986; Klima et al. 1988). However, evidence of sea turtle mortality or injury from blast pressure is sparse, probably due to the difficulty in observing submerged turtles and because affected turtles may remain submerged rather than float to the surface (NRC 1990). Despite this, the relative importance of oil platform removal to overall sea turtle mortality (from human activities) is considered to be low (NRC 1990; NOAA 2003). Under the proposed action, approximately 150 to 275 existing platforms could be removed from the planning areas using explosives.

Mitigation measures in the form of guidelines for explosive platform removals have been established by BOEMRE with the cooperation of the National Marine Fisheries Service (NMFS). These guidelines require a mitigation plan that uses qualified observers to monitor the detonation area for protected species prior to and after each detonation. The detection of sea turtles within a

predetermined radius from the structure prior to detonation would, without exception, delay structure removal. As long as operators comply with these mitigating measures, it is expected that impacts other than short-term behavioral disturbance would be avoided or greatly reduced, and no population-level effects would occur.

OCS Vessel Traffic. Sea turtles could be disturbed by the presence of OCS project vessels traveling from port locations to the construction area, as well as ships supporting pipeline trenching activities. It is unknown whether or how the presence of passing project vessels might affect nearby sea turtles. Sea turtles exposed to a passing vessel could exhibit short-term cessation of normal behaviors and possibly exhibit behavioral responses such as fleeing (Hazel et al. 2007). Construction vessel traffic would be expected in both offshore and coastal areas, and thus could affect sea turtles in coastal nest staging, foraging, and wintering habitats, as well as in offshore foraging areas and along migration routes. Several studies have reported sea turtles to exhibit strong fidelity to migration corridors, habitat foraging grounds, and nesting areas (e.g., see Morreale et al. 1996; Morreale and Standora 1998, Avens et al. 2003; and Casale et al. 2007). Many important coastal habitats for sea turtles are in areas with high levels of commercial and recreational boat traffic (e.g., see USDOT 2008). In such areas, construction vessel traffic would likely result in only a very small incremental increase in overall vessel traffic in many locations.

Boat collisions are reported to be a major cause of injury and mortality in sea turtles (Lutcavage et al. 1997; TEWG 2007). While juvenile and adult sea turtles may avoid areas with heavy vessel traffic, most species generally exhibit considerable tolerance to ships. Because of their limited swimming abilities, hatchlings would likely not be able to avoid oncoming vessels, and thus may be more susceptible to vessel collisions, especially if aggregated in areas of current convergence or in mats of floating *Sargassum*. To date, there is no direct evidence of OCS vessel collisions with sea turtles (of any life stage) in the GOM from oil and gas activities.

The likelihood of such a collision would vary depending upon species and life stage present, the location of the vessel, its speed, and its visibility. Hatchling turtles, including those aggregated in convergence zones or patches of *Sargassum*, would be difficult to spot from a moving vessel because of their small size and generally cryptic coloration patterns, which blend in with the color and patterns of the *Sargassum*. While adult and juvenile turtles are generally visible at the surface during periods of daylight and clear visibility, they may also be very difficult to spot from a moving vessel when resting below the water surface and during nighttime and periods of inclement weather.

While sea turtles are distributed within nearshore waters and waters of the continental shelf throughout the GOM, they appear to occur in greatest abundance east of Mobile, Alabama, in the Eastern Planning Area (Davis et al. 2000). Only a small portion of the Eastern GOM located greater than 160 km (100 mi) from the Florida coast (Figure 1-2) is being considered for the Program. Service vessels that would go to this area are assumed to originate from bases located in coastal areas adjacent to the Central Planning Area; thus the potential for sea turtle collisions with OCS project boats may be very low for the Eastern Planning Area. In contrast, there may be a greater potential for turtle-vessel collisions in the Western and Central Planning Areas, due to the large number of vessel trips in these areas. Under the proposed action, it is

estimated that between 300 and 600 vessel trips would occur per week; most of this activity would occur in the Central and Western Planning Areas. However, BOEMRE has implemented measures for all oil and gas operators in the GOM that require actions to minimize the risk of vessel strikes to protected species, including sea turtles and reporting observations of injured or dead animals (see NTL 2003-G10 [MMS 2003b]). In lieu of a formal observer program, this Notice to Lessees and Operators (NTL) also provides specific guidelines for operators to follow to avoid injury to marine mammals and sea turtles. With compliance, the BOEM expects these measures to reduce the potential for negative impacts to sea turtles from vessel collisions.

Construction and Operation of Onshore Infrastructure. Unless existing onshore facilities are available, new platforms and pipelines will require the construction of new onshore infrastructure such as pipeline landfalls. Onshore construction activities may disturb nesting adults, hatchlings, and nest sites along the northern GOM coastline.

If present in a construction area, nests containing eggs or emerging hatchlings could be destroyed by site clearing and grading activities. Females ready to nest may avoid disturbed historic nesting beaches or may dig nests in poor quality locations where hatchling success may be greatly reduced. Lighting from construction areas may disorient hatchings emerging from nearby nests, which could increase exposure to predators, cause entanglement in vegetation, or lead hatchlings away from the surf (NRC 1990; Witherington and Martin 1996; Lorne and Salmon 2007). Onshore lighting may also draw hatchlings back out of the surf, as well as disorient adult females seeking to nest on nearby beaches.

Although disturbed beaches may undergo restoration activities, such as placement of new sand in disturbed areas, the effectiveness of such actions to restore nesting activity is unknown. Constructed beaches often differ physically from natural beaches and depending on the type of sand used may exhibit sand temperatures quite different from the original pre-disturbed beaches (NMFS and USFWS 2008). Loggerhead nesting activity on restored beaches was found to be reduced the first season following restoration, but much less reduced by the second season, suggesting that nesting activity may return to pre-disturbance levels within a few years (Rumbold et al. 2001). Because nest temperatures affect the sex of hatchlings, restored beach sites with cooler temperatures may skew sex ratios toward males (Milton et al. 1997). Similar impacts could be incurred to more inland reptile species that may occur in brackish environments that are listed as species of concern by the USFWS (e.g., diamondback terrapin [*Malaclemys terrapin*], gulf salt marsh snake [*Nerodia clarkia*]).

Given the small amount of onshore construction that could occur with a pipeline landfall, it is unlikely that onshore construction would impact more than a few nests. The implementation of all mitigation measures required by statutes, regulations, and/or lease stipulations that have applied in past lease sales would also greatly limit the potential for impacts to nests and emerging hatchlings. Applicable mitigation measures may include preconstruction surveys for nest sites and delay of construction activities until hatchlings have emerged and moved into open water. In addition, onshore facilities could be located such that known nesting beaches would not be affected by construction and operation of such facilities.

Operational Discharges and Wastes. Normal operations generate a variety of wastes such as produced water, drilling muds and cuttings, sanitary and other waste fluids, and miscellaneous trash and debris. Hatchling, juvenile, and adult sea turtles may be exposed to these wastes by permitted and accidental discharges from onshore and offshore facilities and OCS service and construction vessels. Produced water and drilling muds may contain a variety of constituents, such as trace metals, hydrocarbons, and NORM (Neff 1997b), which may be toxic to fish and wildlife, including sea turtles. Exposure to these wastes may occur through direct contact with the wastes in the ocean water and through the ingestion of food contaminated by one or more of the waste constituents. Because produced water and other liquid wastes would be rapidly diluted in the open ocean (i.e., to ambient levels within several thousand meters of the discharge), sea turtles would be expected to experience only very low levels of exposure from the water column. Species such as loggerheads and Kemp's ridleys that feed at the top of the food chain have been found to have higher tissue levels of bioaccumulative compounds than species feeding at lower trophic levels (Pugh and Becker 2001).

While there is limited information regarding the levels of some contaminants (such as polychlorinated biphenyls [PCBs] and metals) in sea turtle tissues, little is known about what concentrations are within normal ranges of a particular species or what tissue levels may result in acute or chronic effects (Pugh and Becker 2001; NOAA 2003). In loggerhead turtles, chlordane concentrations have been negatively correlated with blood parameters indicative of anemia, and several classes of organic contaminants have been correlated with hepatocellular damage and possible alterations of protein and ion regulation (Keller et al. 2004).

Ingestion of, or entanglement with, discarded solid debris can adversely impact sea turtles. Ingestion of plastic and other nonbiodegradable debris has been reported for almost all sea turtle species and life stages (NOAA 2003). Ingestion of waste debris can result in gut strangulation, reduced nutrient uptake, and increased absorbance of various chemicals in plastics and other debris (NOAA 2003). Sublethal quantities of ingested plastic debris can result in various effects including positive buoyancy, making them more susceptible to collisions with vessels, increasing predation risk, or reducing feeding efficiency (Lutcavage et al. 1997). Some species of adult sea turtles, such as loggerheads, appear to readily ingest appropriately sized plastic debris. In oceanic waters, floating or subsurface translucent plastic material and sheeting may be mistaken for gelatinous prey items such as jellyfish. Entanglement in debris (such as rope and discarded fishing line) can result in reduced mobility, drowning, and constriction of and subsequent damage to limbs (Lutcavage et al. 1997). However, the discharge or disposal of solid debris into offshore waters from OCS structures and vessels is prohibited by BOEMRE (30 CFR 250.40) and the USCG (MARPOL, Annex V, Public Law 100-220 [101 Statute 1458]). Assuming compliance with these regulations and laws and only accidental releases occur, very little exposure of sea turtles to solid debris generated during normal operations is expected.

Produced waters, drilling muds, and drill cuttings are routinely discharged into offshore marine waters and regulated by USEPA NPDES permits and USCG regulations. Compliance with these permits and regulations will greatly limit the exposure of sea turtles to produced water and other wastes generated at offshore facilities and on OCS vessels. Most operational discharges, as regulated, are diluted and dispersed when released in offshore areas and are considered to have sublethal effects (API 1989; Kennicut 1995). Any potential for impact on sea

turtles from drilling fluids would be indirect, either by impact on prey items or through ingestion via the food chain (API 1989). Contaminants in drilling muds or waste discharge may biomagnify and bioaccumulate in the food web, which may kill or debilitate prey species or species lower in the food web. Sea turtles may bioaccumulate chemicals (Sis et al. 1993), which may ultimately reduce fitness characteristics, such as reproductive output.

4.4.7.4.2 Accidents. All sea turtle life stages, as well as nest sites and eggs, may be exposed to accidental oil releases in the GOM planning areas. In extreme catastrophic oil spills, all life stages of the American crocodile and their habitats may also be exposed to oil (Table 4.4.7-6). The American crocodile inhabits brackish and freshwater environments and is primarily known to occur in coastal mangrove swamps in southern Florida. Depending on location and magnitude, catastrophic oil spills in the GOM have the potential to affect coastal mangrove and beach habitats in southern Florida for the American crocodile.

The effects of accidental oil spills on reptiles are illustrated in Figure 4.4.7-10. Nests may be exposed by oil washing ashore and soaking through overlying soils onto buried eggs, while hatchlings may be exposed as they emerge from nests. Hatchlings, juveniles, and adults may be exposed while swimming through oil on the water surface, through inhalation of petroleum vapors, and through ingestion of contaminated foods and floating tar. Nesting adults (females) may also be exposed while coming ashore on oiled beaches. In addition to direct adverse effects from such exposures, adults and juveniles may also be indirectly affected if an accidental spill reduces the quality or quantity of foraging or nesting habitats. Impacts to nesting habitats could result in population-level effects. Similar impacts could be incurred to more inland reptile species that may occur in brackish environments that are listed as species of concern by the USFWS (e.g., diamondback terrapin [*Malaclemys terrapin*], gulf salt marsh snake [*Nerodia clarkia*]).

Sea turtle behavior may put the turtles at greater risk of oil exposure in the event of an accidental spill. Sea turtles are air breathers and must surface frequently to breathe. Many turtles surface at convergence areas, highly productive areas where ocean currents converge and where spilled oil could be pushed by the ocean currents. These convergence areas also provide food, shelter, and habitat for sea turtles, especially young individuals. Therefore, the accumulation of oil in GOM convergence areas increases the risk of sea turtle exposure to oil (NOAA 2010a).

Sea turtles accidentally exposed to oil or tarballs have been reported to incur a variety of conditions, including inflammatory dermatitis, breathing disturbance, salt gland dysfunction or failure, hematological disturbances, impaired immune responses, and digestive disorders or blockages (Vargo et al. 1986; Lutz and Lutcavage 1989).

Sea turtle nest sites and emerging hatchlings may be exposed to and subsequently affected by oil spills that wash up on nesting beaches and contaminate active nests. Oil may interfere with gas exchange within an oiled nest, may alter hydric conditions of the sand so that it is too wet or too dry for optimal nesting, or may alter nest temperatures by changing the color or

thermal conductivity of the overlying sand (NOAA 2003). Adult females may refuse to use oiled beaches (NOAA 2003).

Eggs exposed to freshly oiled sands may incur a significant decrease in hatching success and an increase in developmental abnormalities in hatchlings (Fritts and McGehee 1982). In contrast, eggs exposed to weathered oil did not produce measurable impacts on hatchling survival or development, suggesting that impacts to nest sites would be greatest if the accidental spill occurred during the nesting season. Because most sea turtles nest above the high-tide line and oil washing ashore would be deposited at and just above the high-tide line, oiling of actual nests is unlikely except possibly in the event of exceptionally high tides or storms.

Hatchlings may become oiled while traveling from the nest to water, and a heavy oil layer or tar deposits on the beach may prevent the hatchlings from reaching water. Oiled hatchlings may have difficulty crawling and swimming, increasing the potential for predation. Open-water convergence zones where hatchlings may aggregate are also areas where oil slicks may aggregate. For example, the Sargasso Sea has been estimated to annually entrap 70,000 metric tons of tar (NOAA 2003). Because hatchlings spend more time at the sea surface, they will be more likely to be exposed to surface oil slicks than adults or juveniles. Post-hatchling sea turtles have been collected from convergence zones off Florida with tar in their mouths, esophagi, and stomachs, and tar caking their jaws (Loehefener et al. 1989; Witherington 1994). Ingested tar may result in starvation from gut blockage and decreased food adsorption efficiency, absorption of toxins, local necrosis or ulceration associated with gut blockage, interference with fat metabolism, and buoyancy problems (NOAA 2003).

Sea turtles surfacing and diving in an oil spill may inhale petroleum vapors and aspirate small quantities of oil. While no information is available about the effects of petroleum vapors or aspirated oil on sea turtles, inhalations by mammals of small amounts of oil or petroleum vapors have been shown to result in acute fatal pneumonia, absorption of hydrocarbons in organs and other tissues, and damage to the brain and central nervous system.

Ingested oil, particularly the lighter fractions, could be toxic to sea turtles. Ingested oil may remain within the gastrointestinal tract, irritate and/or destroy epithelial cells in the stomach and intestine, and subsequently be absorbed into the bloodstream (NOAA 2003). Certain constituents of oil, such as aromatic hydrocarbons and PAHs, include some well-known carcinogens. These substances, however, do not show significant biomagnification in food chains and are readily metabolized by many organisms. Hatchling and juvenile turtles feed opportunistically at or near the surface in oceanic waters and may be especially vulnerable and sensitive to spilled oil and oil residues such as floating tar (Lutz and Lutcavage 1989; Lutcavage et al. 1995). Tar found in the mouths of turtles may have been selectively eaten or ingested accidentally while feeding on organisms or vegetation bound by tar (Geraci and St. Aubin 1987; Geraci 1990).

Certain species of sea turtles may be at greater risk of exposure to spilled oil based on their distributions and habitat preferences and also on the timing of a spill. For example, loggerhead and Kemp's ridley sea turtles frequent current-restricted areas such as bays and estuaries. Because oil entering these areas may remain for longer periods of time due to reduced

weathering rates and natural dispersion, sea turtles using habitats in these areas may incur longer exposure periods. Spills occurring in coastal waters of the Western Planning Area may affect greater numbers of green, hawksbill, loggerhead, and leatherback sea turtles during summer months when nearshore densities are greater than offshore densities.

Oil spill response activities that may adversely affect sea turtles include artificial lighting at night, machine and human activity and related noise, sand removal and cleaning, and the use of dispersant or coagulant chemicals. Lights used to support nighttime cleanup activities may attract sea turtles to the spill location or disorient hatchlings emerging from nearby nests. Machine and human activity may cause a temporary avoidance of nearby habitats (including nest sites) by sea turtles, produce noise that may disturb sea turtles, and also increase the potential for sea turtle collisions with vessels and onshore vehicles. Onshore activities may also crush existing nests and result in beach compaction, reducing the suitability of existing nest sites for future use. Sand removal may also directly impact nest site habitat quality. While oil dispersants or coagulants contain constituents that are considered to be low in toxicity when compared to many of the constituents of spilled oil (Wells 1989), there are little available data regarding the effects of these chemicals on sea turtles (Tucker and Associates, Inc. 1990).

The magnitude and severity of impacts that could result from such exposures would depend on the location of the spill, spill size, type of product spilled, weather conditions, the water quality and environmental conditions at the time of the spill, and the species and life stage of the sea turtle exposed to the spill. The magnitude and extent of any adverse effects would also depend on how quickly a spill is contained and how quickly and effectively cleanup is accomplished. Based upon spill scenario estimates provided in Section 4.4.2, between 200 and 400 spills of <50 bbl of oil and up to 70 spills of ≥50 bbl of oil could be expected in the GOM under the proposed action.

Catastrophic Discharge Event. The PEIS analyzes a CDE up to 7.2 million bbl (Table 4.4.2-2). The recent oil spill associated with the DWH oil rig explosion, which occurred in April 2010 approximately 66 km (41 mi) off the Louisiana coast, may have had detrimental consequences to sea turtles that had direct contact with spilled oil. A total of 1,146 sea turtles were recovered from the GOM that had come in contact with or were in the vicinity of spilled oil. The recovered turtles included adults or free-swimming juveniles of four species: green, hawksbill, Kemp's ridley, and loggerhead. However, some recovered sea turtle species could not be identified (Table 4.4.7-7). Of the total number of turtles recovered, 608 (53%) were found dead and 537 (47%) were found alive. Most of the recovered sea turtles (dead or alive) were Kemp's ridley sea turtles (Table 4.4.7-7). Approximately 85% of the live turtles recovered were visibly oiled; approximately 3% of the dead turtles recovered were visibly oiled (Restore the Gulf 2010a). While in the case of the DWH event, the cause of death of the deceased turtles remains unclear, it is possible for turtles to ingest or inhale oil during a CDE that could be potentially fatal without any noticeable external indications.

A CDE spill also has the potential to affect sea turtle populations by fouling habitats such as seagrass beds and nesting beaches. In the case of the DWH event, preliminary reports on the DWH event from the NOAA Natural Resource Damage Assessment Team have indicated that about 1,600 km (1,000 mi) of shoreline along the GOM has tested positive for oil, including salt

marshes, beaches, mudflats, and mangroves (NOAA 2010b). The presence of oil in these areas likely affected foraging and nesting habitats for sea turtles, although the true ecological consequences of these effects are not known.

4.4.7.4.3 Conclusion. Under the proposed action, some routine operations could affect individual sea turtles, but population-level impacts are not expected. Noise generated during exploration and production activities and platform removal may result in the temporary disturbance of some sea turtles, while some turtles may be injured or killed during the use of underwater explosives for platform removal. Sea turtles could be directly affected by construction of offshore and onshore facilities and pipeline trenching, and also indirectly by short-term and long-term impacts to habitats. The construction and operation of new onshore facilities may impact nest sites, possibly result in eggs being crushed, and disturb hatchling movement from the nest sites to the water. Sea turtles may also be injured or killed by collisions with OCS vessels. Sea turtles may also be exposed to a variety of waste materials which have the potential to cause a variety of lethal and sublethal effects**.** Accidental spills have the potential to foul habitats and injure or kill exposed sea turtles. Depending on magnitude and location, catastrophic accidental oil spills have the potential to affect American crocodile habitats and exposed individuals. Many of these impacts would be of relatively short duration and localized and would likely affect relatively few individuals in the immediate project area. Existing permit requirements, regulatory stipulations, and BOEM guidelines and mitigation measures, if applied, target many of the routine operations and could limit the potential effects. Impacts to reptiles from routine operations associated with the Program are expected to range from minor to moderate.

Any of the oil-spill scenarios developed for the proposed action (Section 4.4.2) may result in the exposure of one or more life stages of reptiles to oil or its weathered products. Oil may reduce egg hatching and hatchling survival and may inhibit hatchling access to water. Hatchlings, juveniles, and adults may inhale or ingest oil and oil vapors and may incur any of a variety of physiological impacts. The presence of oil slicks or oiled beaches may alter habitat use and affect nest site access and use. Small spills that may occur under the proposed action are unlikely to affect a large number of sea turtles or their habitats and are not expected to have long-term effects on sea turtle populations in the GOM. A large spill could affect many more individuals and habitats, including nesting beaches, and, in the case of a CDE, potentially may incur population-level effects. The magnitude of effects from accidental spills would depend on the location, timing, and volume of the spills; the environmental settings of the spills; and the species and life stages of sea turtle exposed to the spills. Because 93% of the new oil production that is expected to occur during the Program is assumed to occur far from the coast in deep water (>200 m [656 ft] deep), the likelihood of a large spill occurring close enough to the coastline to affect turtle nesting beaches is expected to be small. However, a CDE occurring in deep water has a greater likelihood of reaching coastal areas, although this will depend on the specific location of the spill and the prevailing currents in that area. The rapid deployment of spill-response teams and implementation of cleanup activities could limit the magnitude of impacts incurred by sea turtles in the event of an accidental spill; however, cleanup operations themselves could also impact sea turtle habitats.

4.4.7.5 Invertebrates and Lower Trophic Levels

4.4.7.5.1 Gulf of Mexico.

Routine Operations. Impacting factors common to all phases include vessel discharges (bilge and ballast water), miscellaneous discharges (deck washing, sanitary waste), and offshore lighting. Many of these waste streams are disposed of on land, and all vessel and platform waste streams must meet USEPA and/or USCG regulatory requirements before discharge into surface waters. Impacts from waste discharges would be localized and temporary and are expected to have negligible impacts on invertebrate populations. Studies conducted in the northern GOM suggest that platform lighting could alter predator-prey dynamics by enhancing phytoplankton productivity around the platform, attracting phototaxic pelagic invertebrates, and potentially improving the visual foraging environment for fishes (Keenan et al. 2007). Consequently, increased predation of invertebrates may occur in the vicinity of the platform. Potential impacts from platform lighting would be localized but long-term and are expected to have minimal impacts on invertebrate populations.

Exploration and Site Development. During the OCS oil and gas exploration and development phase, invertebrates could be affected by noise from seismic surveys and noise and bottom disturbance from drilling, platform placement, and pipeline trenching and placement activities. Releases of drilling muds and cuttings could also affect invertebrates by contaminating sediments and surrounding surface waters (Table 4.4.7-8).

Noise from vessel traffic, construction, seismic surveys, and drilling could kill or injure invertebrates close enough to the noise source, as well as reducing habitat suitability, as some species would avoid the area. For example, decapods and cephalopods, two numerically abundant and commercially important groups of invertebrates, are known to detect vibrations from underwater noise and may be sensitive to noise from vessel traffic, seismic surveys, and drilling (DFO 2004; National Science Foundation and USGS 2010). Recent reviews of the impacts of anthropogenic noise on invertebrates indicates that invertebrates exposed to noise could exhibit pathological effects (i.e., injury and mortality), physiological changes (i.e., changes in hormone, protein, and enzyme levels), and/or behavioral changes (such as a startle response) and change swimming and movement patterns (DFO 2004; National Science Foundation and USGS 2010). Although data is limited, zooplankton and larvae stages may be injured because of their small size and relative lack of mobility, while noise is often found to have negligible effects on adult invertebrates (reviewed in DFO 2004 and National Science Foundation and USGS 2010). The studies typically suggested that injury was limited to within 10 m (33 ft) of the noise source. The numbers of invertebrates that could be affected by noise during the exploration and site development phase make it unlikely that noise impacts would have appreciable effects on invertebrate populations in the Western and Central Planning Areas. A recent review of the effects of seismic survey activities on marine invertebrates concluded that although data were limited, mortality and injury of invertebrates would be limited to organisms located within a few meters of the air gun, and that there would be no significant impacts on marine invertebrate populations from air gun and sonar sounds (National Science Foundation and USGS 2010). The severity and duration of noise impacts would vary with site and development

TABLE 4.4.7-8 Impacting Factors Potentially Affecting Invertebrates and Their Habitat in the GOM Planning Areas

Development Phase and Impacting Factor	Life Stage Affected[a]		
	Eggs	Larvae	Adults
Impacting Factors Common to All Phases			
Vessel noise	X	X	X
Vessel traffic	X	X	X
Hazardous materials	X	X	X
Solid wastes	X	X	X
Offshore lighting	X	X	X
Aircraft noise			
Offshore air emissions			
Onshore air emissions			
Aircraft traffic			
Miscellaneous platform discharges	X	X	X
Vessel discharges	X	X	X
Bottom disturbance from vessel anchors	X	X	X
Exploration and Development			
Seismic noise	X	X	X
Noise from drilling and construction	X	X	X
Bottom disturbance from platform placement, drilling, and pipeline placement and trenching	X	X	X
Discharge of drilling muds and cuttings	X	X	X
Production			
Production noise	X	X	X
Produced water discharge	X	X	X
Artificial reef	X	X	X
Decommissioning			
Platform removal (non-explosive)	X	X	X
Platform removal (explosive)	X	X	X

[a] colors indicate impact level: white = negligible; blue = minor; yellow = moderate; red = major.

scenario, but given the temporary and localized nature of the noise generating activities, impacts on invertebrates are expected to be negligible.

Bottom-disturbing activities such as coring and drilling, platform placement and mooring, and pipeline trenching and placement would displace, injure, or kill invertebrates in the vicinity of the activities. The estimated bottom habitat that may be directly disturbed by new pipeline and platform installation ranges from 2,150 to 14,000 ha (5,313 to 34,594 ac) over the entire GOM. In the initial drilling phase before a riser is installed, drilling muds would accumulate around the well and bury benthic invertebrates as well as create a turbidity plume that could

impact pelagic invertebrates located near the bottom. Drilling is also expected to increase the amount of sand in sediments surrounding the well for at least 300 m (984 ft) (Continental Shelf Associates, Inc. 2006). This change in grain size could alter community composition and prevent the settlement of some species. In addition, bottom disturbance during platform and pipeline placement would result in sedimentation and turbidity, which could bury benthic infauna and damage the gills of water-column and benthic invertebrates present within some distance of the disturbance. These disturbances would be localized and temporary. Species most likely to be affected are sessile benthic organisms and small zooplankton, which lack the mobility to avoid the direct disturbance and the associated turbidity plumes. An FPSO system may be employed for deepwater wells. Under the FPSO system, oil would be transported from the well to a surface vessel and ultimately to shore. By eliminating the need for pipelines, an FPSO system would greatly reduce bottom disturbance and the chance for disturbing benthic and near-bottom invertebrates and their habitat. Most disturbed areas would be recolonized quickly, but, if grain size is significantly altered, the benthic community may take several years to return to its pre-disturbance composition (Bolam and Rees 2003 and references therein).

The effects of drilling muds and cuttings (including drilling fluids adhering to the cuttings) on invertebrates can be chemical such as toxicity or physical such as gill abrasion, burial, or displacement from turbidity and sedimentation. Impacts from turbidity and sedimentation would be similar to those described above and could damage respiratory structures and disrupt food acquisition at all trophic levels. Drilling wastes released near the sediment surface or in shallow water would bury benthic organisms in the release area. Muds released in deeper water or near the water's surface would be spread over a greater area in a thinner layer and may not result in high mortality, although impacts to water-column invertebrates may be greater under this scenario. The disturbance would be short in duration, with repopulation of the affected area occurring by larval recruitment. In addition, drilling discharges must comply with NPDES permit requirements regarding the discharge amount, rate, and toxicity, which would greatly reduce the impact to invertebrate communities.

The USEPA and BOEM have sponsored research on the biological effects of drilling fluids on benthic invertebrates. In studies conducted on the GOM continental shelf and slope, synthetic drilling fluids in sediments were elevated within 500 m (1,640 ft) of the well (Continental Shelf Associates, Inc. 2004, 2006). Meiofaunal and macroinvertebrate abundance were typically highest near the well, and were often found to increase with the concentration of drilling fluids in the sediment (Continental Shelf Associates, Inc. 2006). However, the effects of drilling muds appears to be species-dependent. Amphipod, ophiuroid, and ostrocod densities were depressed within 300 m (984 ft) of the well compared to control areas, while copepods, nematodes, and several classes of dominant infauna including worms, clams, and snails were more abundant within 300 m (984 ft) of the well (Continental Shelf Associates, Inc. 2006). Sediments collected near the well were found to be toxic to amphipods, which explains their depressed abundance (Continental Shelf Associates, Inc. 2004, 2006). The elevated abundance of most infauna may have been due to the high organic matter content of the drilling fluids adhering to the muds and cuttings. Some sites showed particularly high abundance of species tolerant of organic enrichment (Continental Shelf Associates, Inc. 2006). However, the high organic matter content also created anoxic patches along the seafloor that contained very few infauna. The recovery time for benthic communities will depend on impact magnitude and

species present, and existing data suggest recovery will begin rapidly but may take years for recovery to pre-disturbance communities (Continental Shelf Associates, Inc. 2004, 2006).

Overall, the site development and exploration represent a moderate disturbance primarily affecting benthic invertebrates, with the severity of the impacts generally decreasing dramatically with distance from bottom-disturbing activities. Recovery of invertebrate communities could range from short-term to long-term.

Production. Production activities that could affect soft sediment habitat include operational noise, bottom disturbance from the movement of mooring anchors, chains, and cables, and the release of process water. In addition, the platform would replace existing featureless soft sediments and potentially serve as an artificial reef (Table 4.4.7-8).

Chronic bottom disturbance would result from the movement of anchors and chains associated with support vessels and floating platform moorings. Bottom disturbance would impact invertebrates in a manner similar that described above for the exploration and site development phase. The disturbance would be episodic and temporary, but would last for the lifetime of the platform.

Sessile epifaunal invertebrates requiring hard substrate (i.e., barnacles and corals) as well as small motile invertebrates (amphipods and worms) would be able to colonize the structure of the platform, resulting in an artificial reef. Unburied pipelines would also provide hard substrate for sessile and structure-oriented invertebrates. Although densities of some zooplankton species were elevated near the platforms in the northern GOM, the effect was not consistent (Keenan and Benfield 2003). The platform would likely increase shell material and organic matter in the surrounding sediments, potentially resulting in a shift in benthic invertebrate community composition. The replacement of soft sediment with artificial reef would only exist during the production phase, unless the platform was permitted to remain in place after decommissioning. Because platforms are spread across a large area of the GOM, they could provide habitat for non-native invertebrate species that prefer hard substrate. Such species could be introduced by a number of mechanisms both natural and anthropogenic (commercial shipping and human introduction). In the deep sea, floating production platforms are used that could create a floating reef habitat at the surface. In deep sea soft sediment, communities may form on mooring structures, but colonization would likely be slow and mooring structures would be completely removed during decommissioning, so impacts, if any, would be temporary.

Produced water contains metals, hydrocarbons, salts, and radionuclides, and its discharge could contaminate habitat resulting in lethal and sublethal effects on invertebrates. Organisms attached to oil platforms have not been found to accumulate metals, although they have been found to bioaccumulate organic contaminants (Neff 2005; Trefry et al. 1995). Produced water from deepwater wells is expected to contain more chemical contaminants to maintain adequate flow. Contaminants from produced water discharges are not expected to reach toxic levels in the sediment and water column due to dilution and NPDES permitting requirements regarding discharge rate, contaminant concentration, and toxicity. Invertebrates collected in sediments near platforms in the GOM do not appear to bioaccumulate the common contaminants in produced water, such as radionuclides, metals, and hydrocarbons, and in most cases, the

concentration of these contaminants in their tissues did not exceed USEPA-specified concentrations considered harmful (Continental Shelf Associates, Inc. 1997). Produced water is also not expected to contribute significantly to the creation of hypoxic bottom water conditions (Rabalais 2005; Bierman et al. 2007). Consequently, impacts to water-column and benthic invertebrates should be minor.

The results of the GOM Offshore Monitoring Experiment, funded by BOEM, provide a good summary of the long-term sublethal impacts of oil and gas development on invertebrates at the individual, population, and community level (Kennicutt et al. 1995). Stations surrounding petroleum wells were sampled in a radial pattern with stations at 30–50, 100, 200, 500, and 3,000 m distances (98–164, 328, 656, 1,640, and 9,842 ft). Elevated sediment concentrations of sand, organic matter, hydrocarbons, and metals were generally restricted to sediments within 200 m (656 ft) of the platforms. Overall, there was no evidence of sublethal physiological stress or change in distribution of epifaunal invertebrates attributable to the presence of the platform. Oil and gas development activities resulted in altered infaunal communities within 100 m (328 ft) of the platform, with reduced density and diversity of crustaceans (primarily amphipods and copepods) near the platform and enhanced density of polychaetes and deposit-feeding nematodes. The patterns in invertebrate density were often attributable to changes in a few species. Differences in abundance between near- and far-field stations were the product of toxic response of sensitive crustacean species and sediment organic enrichment, which increased the density of worms (Kennicutt et al. 1995). Toxicity tests indicated copepod survival, reproduction, and genetic diversity were lower near the platforms due to metal concentrations (Kennicutt 1996; Montagna and Harper 1996) or the reef effect of the platform (Montagna et al. 2002). Thus, production activities are expected to result in minor impacts to invertebrates.

Decommissioning. Platform removal (potentially using explosives) would temporarily affect benthic and pelagic invertebrates, as described above, by disturbing sediments and increasing noise and turbidity for some length of the water column. Deposition of suspended sediments could bury, smother, or kill some benthic organisms in the vicinity of work sites. Mortality to epifauna should be limited to within a few meters of the blast (O'Keeffe and Young 1984). In addition, the explosive charges typically would be set at 5 m (16 ft) below the seafloor surface, which would significantly attenuate the shock wave as it moved through the seabed. Displaced invertebrate communities would repopulate the area over a short period of time, although a return to the pre-disturbance community may take longer. No permanent change in benthic communities would result from floating platform removal. However, if fixed platforms are toppled and left in place, the changes to invertebrate communities resulting from the initial platform installation would be permanent. Pipelines installed and anchored on the seafloor would be capped and left in place, although there is the potential for chronic sediment disturbance from pipeline movement. Pipelines not buried would also continue to serve as hard substrate for sessile invertebrates and structure oriented invertebrates. Overall, impacts to invertebrates associated with decommissioning activities are expected to be minor.

Accidents. Accidental hydrocarbon spills can occur at the surface or at the seafloor, potentially affecting pelagic and benthic invertebrates. Exposure to hydrocarbons can result in lethal or sublethal (reproduction, recruitment, physiology, growth, development, and behavior)

impacts at the level of the individual, while catastrophic oil spills could result in population-level effects and complex indirect effects on species interactions (i.e., competition and predation) in some cases. Invertebrates differ in their sensitivity to hydrocarbon pollution both by organism class and life stage (Laws 1992). For example, crustaceans appear to be among the taxa most sensitive to oil pollution, while certain species of worms, such as Capitellid polychates, appear to be tolerant of oil pollution (Blumer et al. 1971; Laws 1992; NRC 2003b). Among meiofauna, nematodes may be less sensitive to oil than copepods.

Most oil and gas spills would be small and rapidly be diluted and are expected to primarily affect invertebrates in the water column, as most hydrocarbons would float above the sediment surface. However, even a small spill (<999 bbl) could affect intertidal and subtidal invertebrates. After the spill of 600 bbl of crude oil in Barataria Bay, Louisiana, Roth and Baltz (2009) found a reduction in total number of decapod crustaceans as well as reduction in grass shrimp (*Palaeomonetes pugio*) 3 weeks after the spill occurred. The impact magnitude of these small oil spills on invertebrates is primarily a function of the invertebrate species and habitat affected. Impacts from spills would be greatest if a large spill occurred during a reproductive period or contacted a location important for spawning or growth such as intertidal and nearshore subtidal habitats. However, it is anticipated that only a small amount of shoreline would be affected by these smaller oil spills and would not, therefore, present a substantial risk to invertebrate populations. Impacts from small and large spills are expected to be temporary as oil is diluted and broken down by natural chemical and microbial processes.

Catastrophic Discharge Event. The PEIS analyzes a CDE up to 7.2 million bbl (Table 4.4.2-2). Spilled oil has been found to affect pelagic and sediment-dwelling invertebrates (Laws 1992; reviewed in NRC 2003b). Pelagic invertebrates are concentrated in the upper water column so oil and gas reaching the surface from a surface or subsurface CDE spill have the potential to affect the greatest number of invertebrates. Hydrocarbon releases at the seafloor would typically rise in the water column, which would limit direct contact with benthic invertebrates. However, benthic invertebrates could be affected directly by oil reaching intertidal or shallow subtidal habitats or natural deposition of oil contaminated pelagic organic matter and biota, which could ultimately enter the benthic invertebrate food web. The location of the CDE and the season in which the CDE occurred would be important determinants of the impact magnitude of the spill. For example, catastrophic spills occurring during recruitment periods or spills that affect areas with high larval invertebrate concentrations (i.e., estuaries) would have the greatest impact. In addition, the magnitude of a spill's impacts on invertebrates and their habitat would likely increase with the degree of shoreline oiling, as estuaries have high biological productivity and serve as critical habitat for invertebrates. Oil would persist longer in the environment than gas and oil could be transported to the shoreline where it could reduce local populations of shallow subtidal and intertidal coastal habitat for an extended period of time. However, a spill of this kind is unlikely to occur, and invertebrates typically have short generation times and should recover from even a catastrophic spill. Therefore, no permanent impacts to invertebrate communities are expected to result from an accidental oil spill.

Prior studies provide insight into the potential long-term effects of an oil spill on invertebrate populations in the GOM. A large oil spill in Panama affected intertidal and subtidal infauna and epifauna, with the impact magnitude and recovery time varying with the habitat,

organism, and degree of oiling (Jackson et al. 1989; Keller and Jackson 1993). Oysters and mussels within mangroves, as well as amphipods, tanaids, and ophiurods in seagrass habitats, displayed long-term (>9 months) reduction in abundance compared to unoiled areas. Corals and associated biota were also affected by the spill, especially at the reef edge that received the heaviest oiling. Although many species recovered within a few months to 2 years, certain crustaceans and oysters had not recovered within 5 years (Keller and Jackson 1993). Guzman et al. (1993) estimated a total recovery time of 10 to 20 years. The 1979 Ixtoc I spill in the Bay of Campeche was not well studied; therefore it is difficult to assess the extent of impacts on invertebrates (ERCO/Energy Resources Co. Inc 1982). Most studies of the Ixtoc spill occurred in south Texas far from the spill site. In these studies, sediment contamination was not detected and no strong links between Ixtoc oil and changes in invertebrate communities could be found (ERCO/Energy Resources Co. Inc 1982; Laws 1993). In a study of upper Galveston Bay, a site of heavy oil and gas activity with a history of spills, Rozas et al. (2000) found no consistent significant relationships between sediment oil concentration and invertebrate densities, despite testing multiple species. Although sediment contamination did not appear to affect habitat use, sublethal exposure impacts could have been possible.

4.4.7.5.2 Alaska– Cook Inlet.

Routine Operations. Potential OCS oil and gas development impacting factors relevant to invertebrates are shown by phase in Table 4.4.7-9. Impacting factors common to all phases include vessel noise and discharges (bilge and ballast water), miscellaneous discharges (deck washing, sanitary waste), and offshore lighting. Impacts from these activities would be localized and temporary and would range from short-term to long-term. Overall, vessel and miscellaneous discharges are not expected to impact invertebrate communities in the sediment or water column, because many of these waste streams are disposed of on land or must meet USEPA and/or USCG regulatory requirements before being discharged into surface waters. Studies of platform lighting suggest the lights would alter predator-prey dynamics by enhancing phytoplankton productivity around the platform, attracting phototaxic invertebrates and potentially improving the visual foraging environment for fishes (Keenan et al. 2007).

Exploration and Site Development. During the OCS oil and gas exploration and development phase, invertebrates could be affected by noise from seismic surveys and noise and bottom disturbance from drilling, platform placement, and pipeline trenching and placement activities.

Noise from vessel traffic, construction, seismic surveys, and drilling could kill or injure invertebrates close enough to the noise source, as well as reducing habitat suitability, as some species would avoid the area. For example, decapods and cephalopods, two numerically abundant and commercially important groups of invertebrates, are known to detect vibrations from underwater noise and may be sensitive to noise from vessel traffic, seismic surveys, and drilling (DFO 2004; National Science Foundation and USGS 2010). Recent reviews of the impacts of anthropogenic noise on invertebrates indicates that invertebrates exposed to noise could exhibit pathological effects (i.e., injury and mortality), physiological changes (i.e., changes in hormone, protein, and enzyme levels), and/or behavioral changes (such as a startle response)

TABLE 4.4.7-9 Impacting Factors Potentially Affecting Invertebrates and Their Habitat in the Cook Inlet Planning Area

	Life Stage Affected[a]		
Development Phase and Impacting Factor	Eggs	Larvae	Adults
Impacting Factors Common to All Phases			
Vessel noise	X	X	X
Vessel traffic	X	X	X
Hazardous materials	X	X	X
Solid wastes	X	X	X
Offshore lighting	X	X	X
Aircraft noise			
Offshore air emissions			
Onshore air emissions			
Aircraft traffic			
Miscellaneous platform discharges	X	X	X
Vessel discharges	X	X	X
Bottom disturbance from vessel anchors	X	X	X
Exploration and Development			
Seismic noise	X	X	X
Noise from drilling and construction	X	X	X
Bottom disturbance from platform placement, drilling, and pipeline placement and trenching	X	X	X
Discharge of drilling muds and cuttings	X	X	X
Production			
Production Noise	X	X	X
Produced water discharge	X	X	X
Artificial reef	X	X	X
Decommissioning			
Platform removal (non-explosive)	X	X	X

[a] Colors indicate impact level: white = negligible; blue = minor; yellow = moderate; red = major.

and change swimming and movement patterns (DFO 2004; National Science Foundation and USGS 2010). Although data is limited, zooplankton and larvae stages may be injured because of their small size and relative lack of mobility, while noise is often found to have negligible effects on adult invertebrates (reviewed in DFO 2004 and National Science Foundation and USGS 2010). The studies typically suggested that injury was limited to within 10 m (33 ft) of the noise source. The numbers of invertebrates that could be affected by noise during the exploration and site development phase make it unlikely that noise impacts would have appreciable effects on invertebrate populations in the overall Cook Inlet Planning Area. A recent review of the effects of seismic survey activities on marine invertebrates concluded that although data were limited, mortality and injury to invertebrates would be limited to organisms located

within a few meters of the air gun, and that there would be no significant impacts on marine invertebrate populations from air gun and sonar sounds (National Science Foundation and USGS 2010). The severity and duration of noise impacts would vary with site and development scenario, but given the temporary and localized nature of the noise generating activities, impacts on invertebrates are expected to be negligible.

Bottom-disturbing activities such as coring and drilling, platform placement and mooring, and pipeline trenching and placement would displace, injure, or kill invertebrates in the vicinity of the activities. Exploration would involve semisubmersible or floating drilling rigs, jack-up rigs, and bottom-founded rigs depending on water depth. Production rigs would most likely be fixed platforms. In the initial drilling phase before a riser is installed, drilling muds and cuttings would accumulate around the well and bury benthic invertebrates as well as create a turbidity plume that could adversely impact pelagic invertebrates located near the bottom. This change in grain size could alter community composition and prevent the settlement of some species. In addition, bottom disturbance during platform and pipeline placement would result in sediment resuspension and turbidity, which could bury benthic infauna and damage the gills of water-column and benthic invertebrates present within some distance of the disturbance. Platforms and pipeline placement would disturb 1.5 to 4.5 ha (4 to 11 ac) and 35 to 210 ha (86 to 519 ac) of bottom habitat, respectively. In addition, up to one pipeline landfill may result from the proposed action. Species most likely to be affected by bottom-disturbing activities are sessile and infaunal benthic organisms and small zooplankton that lack the mobility to avoid the direct disturbance and the associated turbidity plumes. Pipelines would be installed and anchored on the surface or buried. Pipelines could crush, injure, or displace invertebrates, as well as shift invertebrate community composition to those species preferring hard substrate. Soft-sediment invertebrates, particularly in shallow water, are subject to frequent bottom disturbance and sediment resuspension due to human activities such as trawling and natural occurrences such as storms. Thus, disturbed areas would likely be recolonized quickly, but, if grain size is greatly altered and slow to recover, the benthic community may take from a few months to several years to return to its pre-disturbance composition (Bolam and Rees 2003 and references therein).

The discharge of drilling muds and cuttings (including synthetic drilling fluids adhering to the cuttings) can adversely affect invertebrates in several ways. The effects of drilling muds and cuttings (including drilling fluids adhering to the cuttings) on invertebrates can be chemical such as toxicity or physical such as gill abrasion, burial, or displacement from turbidity and sedimentation. Impacts from turbidity and sedimentation would be similar to those described above and could damage respiratory structures and disrupt food acquisition at all trophic levels. Drilling wastes released near the sediment surface or in shallow water would bury benthic organisms in the release area. Muds released in deeper water or near the water's surface would be spread over a greater area in a thinner layer and may not result in high mortality, although impacts to water column invertebrates may be greater under this scenario. The disturbance would be short in duration, with repopulation of the affected area occurring by larval recruitment. In addition, drilling discharges must comply with NPDES permit requirements regarding the discharge amount, rate, and toxicity, which would greatly reduce the impact to invertebrate communities.

Overall, site development and exploration activities would result in moderate and temporary effects on primarily benthic invertebrates, with the severity of the impacts generally decreasing dramatically with distance from the disturbance. Recovery of benthic habitat could range from short-term to long-term.

Production. Production activities that could affect invertebrates in Cook Inlet include operational noise, bottom disturbance from anchors and the release of process water. In addition, the platform would replace existing featureless soft sediments and serve as an artificial reef (Table 4.4.7-9).

Chronic disturbance to benthic invertebrates would result from the movement of pipelines and anchors and chains associated with support vessels. Pipelines not buried would be anchored in place which would minimize their movement and potential to disturb benthic invertebrate communities. Bottom disturbance would impact invertebrates in a manner similar that described above for the exploration and site development phase. The disturbance would be episodic and temporary, but would last for the lifetime of the platform.

Produced water contains metals, hydrocarbons, salts, and radionuclides, and their discharge could contaminate habitat resulting in lethal and sublethal effects on invertebrates, particularly non-mobile benthic infauna. However, NPDES permitting requirements regarding discharge rate, contaminant concentration, and toxicity would greatly reduce the potential for impacts to invertebrates. In addition, it is assumed that all produced water would be disposed of by injection into permitted disposal wells. Therefore, the effects of produced water discharges on invertebrates are expected to be minimal.

Platforms would add a hard substrate to the marine environment, providing additional habitat for marine plants and animals (e.g., kelp and mussels) that require a hard substrate. The platform would likely increase shell material and organic matter in the sediments surrounding the platform, potentially resulting in a shift in benthic invertebrate community composition.

A two-year (1997–1998) study of contaminant levels in the sediments of the Shelikof Strait and Cook Inlet provide information on the overall, long-term potential effects of oil and gas development in the Cook Inlet Planning Area (MMS 2001a). Samples of sediment from depositional areas (where sediment contamination is expected to be greatest) suggested that metals and PAHs in sediments derived primarily from natural sources rather than past oil and gas developments (MMS 2001a). In addition, sediment concentrations of metals and organic contaminants in outermost Cook Inlet and Shelikof Strait (1) have not increased significantly since offshore oil exploration and production began in Cook Inlet (circa 1963) and (2) posed only minor risks to benthic biota or fish (MMS 2001a). Consequently, it is expected that production activities would have negligible effects on invertebrate communities in Cook Inlet.

Decommissioning. No explosive platform removals are anticipated under the proposed action. Nonexplosive removals (e.g., abrasive, mechanical, or diver cutters) would have negligible long-term impacts to invertebrates, although individuals associated with the platform would experience, injury, mortality, or loss of habitat. Most sediments will recover their normal physical characteristics, ecological functions, and biological communities. Pipelines installed

and anchored on the seafloor would be capped and left in place, although there is the potential for chronic sediment disturbance from pipeline movement. If fixed platforms are left in place, the changes to invertebrate communities resulting from the initial platform installation would be permanent. Overall, impacts associated with decommissioning activities are expected to be negligible.

Accidents. Accidental hydrocarbon releases can occur at the surface or at the seafloor, potentially affecting pelagic and benthic invertebrates. Exposure to hydrocarbons can result in lethal or sublethal (reproduction, recruitment, physiology, growth, development, and behavior) impacts. Most small hydrocarbon releases would rapidly be diluted and are expected to primarily affect invertebrates in the water column as most oil and gas would float above the sediment surface. The impact magnitude of these oil spills on invertebrates is primarily a function of the invertebrate species and habitat affected. Impacts from spills would be greatest if a large spill occurred during a reproductive period or contacted a location important for spawning or growth such as intertidal and nearshore subtidal habitats. However, it is anticipated that only a small amount of shoreline would be affected by these smaller spills and they would not, therefore, present a substantial risk to invertebrate populations.

Catastrophic Discharge Event. The PEIS analyzes a CDE of 75 to 125 thousand bbl in the Cook Inlet Planning Area (Table 4.4.2-2). Because the Cook Inlet Planning Area is located within a relatively confined estuary, the likelihood of oil from a catastrophic spill contacting part of the shoreline is relatively high and is a function of assumed spill location. Site-specific evaluations would have to be conducted to fully evaluate potential spill trajectories from future lease sales. Benthic invertebrates in intertidal and shallow subtidal areas are likely to be contacted by an oil spill. In addition, some oil spill-response activities could adversely affect lower trophic-level organisms. For example, dispersants could increase oil toxicity, and cleanup techniques, the presence of large numbers of people, or the use of heavy equipment on shorelines could kill some coastal organisms during cleanup responses.

The toxicity of released hydrocarbons would probably decrease rapidly because of evaporation, dispersion, and dilution. Thus, it is concluded that planktonic organisms within the area of lethal hydrocarbon concentration could be killed during the first few days of a hydrocarbon spill; after that, the primary effects would be sublethal responses such as reduction in growth or reproductive rates except at the surface boundary of an oil slick. Large-scale changes in overall plankton populations in Cook Inlet are considered unlikely. However, intertidal invertebrates could experience long-term exposures, as oil could persist in intertidal sediments for decades. Thus invertebrate populations could be depressed for a decade or more (Highsmith et al. 2001; Exxon Valdez Oil Spill Trustee Council 2009a).

Studies following the *Exxon Valdez* spill give insight into the impacts of a catastrophic oil spill on vertebrate communities and their subsequent recovery. Amphipods, sea stars, and certain crabs were less abundant in oiled sites compared to areas not affected by the spill (*Exxon Valdez* Oil Spill Trustee Council 2010c). Studies of mussels indicated hydrocarbons accumulated in their tissue in the decade after the spill at sites where oil did not break down. However, by 1999, contaminant levels in mussels from the most heavily oiled beds in Prince William Sound were similar to background levels even though sediment contamination was still

present (*Exxon Valdez* Oil Spill Trustee Council 2010c). Stress-tolerant invertebrates like polychaetes and snails did not appear to suffer long-term population declines in oiled areas. As late as 2002, studies of clams indicated differences in population structure between areas affected by the spill and clean areas (*Exxon Valdez* Oil Spill Trustee Council 2010c). However, much of the long-term reduction in clam densities may have been due to the high-pressure beach washing that occurred after the spill (*Exxon Valdez* Oil Spill Trustee Council 2009a). In intertidal areas, the *Exxon Valdez* spill created large density fluctuations in kelp communities that serve as habitat for benthic invertebrates. Intertidal experimental studies have demonstrated that rocky intertidal communities are particularly slow to recover (+10 years) following disturbance (Highsmith et al. 2001). As of 2009, clams, mussels, and intertidal communities are still listed as recovering (*Exxon Valdez* Oil Spill Trustee Council 2009a).

4.4.7.5.3 Alaska – Arctic. Impacting factors common to all phases include vessel discharges (bilge and ballast water), miscellaneous discharges (deck washing, sanitary waste), and offshore lighting. Impacts from these activities would be localized and temporary and would range from short-term to long-term. These discharges are expected to have no or negligible impacts on invertebrate communities in the sediment and water column because many of these waste streams are disposed of on land or must meet USEPA and/or USCG regulatory requirements before being discharged into surface waters. Studies of platform lighting suggest the lights would alter predator-prey dynamics by enhancing phytoplankton productivity around the platform, attracting phototaxic invertebrates, and potentially improving the visual foraging environment for fishes (Keenan et al. 2007).

Routine Operations.

Exploration and Site Development. During the OCS oil and gas exploration and development phase, invertebrates could be affected by noise from seismic surveys and noise and bottom disturbance from drilling, subsea well, gravel island, and platform placement, and pipeline trenching and placement activities. See Section 4.4.7.5.2 for a complete discussion of the effects of exploration and site development activities on invertebrates.

Noise from seismic surveys and drilling could kill or injure invertebrates close enough to the noise source and reduce habitat suitability as some species would avoid the area. Noise is expected to have negligible effects on invertebrate populations in the overall Beaufort and Chukchi Planning Areas (see Section 4.4.7.5.2).

Bottom-disturbing activities such as drilling, subsea well and platform placement, and pipeline trenching and placement would displace, injure, or kill invertebrates in the vicinity of the activities, as described in Section 4.4.7.5.2. In addition to burying and displacing benthic communities, the construction of artificial islands would permanently alter sediment composition and shift benthic invertebrate communities to species adapted to coarse gravel substrate. Platform and pipeline placements in the Beaufort and Chukchi Planning Areas would disturb 3 to 13.5 ha (7 to 33 ac) and 77 to 567 ha (190 to 1,401 ac) of bottom habitat, respectively. Pipelines would be installed and anchored on the surface or buried in waters less than 50 m (156 ft) to prevent damage from ice gouges. Pipelines could crush, injure, or displace invertebrates, as well

as shift invertebrate community composition to those species preferring hard substrate. Benthic habitats such as the Steffanson Boulder Patch and kelpbeds would be protected by stipulations that require surveys for and avoidance of sensitive biological habitat. Although pipeline and platform placement would disturb a large area of the seafloor, it is not expected to have a measurable effect on regional populations. The benthic community in these areas experiences similar naturally occurring disturbances from ice gouging, strudel scour, and severe storms. In the Arctic, recolonization by benthic invertebrates can be slow to begin, and the benthic community may take several years to return to its pre-disturbance composition following bottom-disturbance activities (Conlan and Kvitek 2005). Overall, moderate but temporary impacts to invertebrates are expected to result from platform and pipeline placement.

The discharge of drilling muds and cuttings from exploration wells could adversely affect pelagic and benthic invertebrates (Section 4.4.7.5.2). However, drilling discharges must comply with NPDES permit requirements regarding the discharge amount, rate, and toxicity, which would greatly reduce the impact to invertebrate communities.

Overall, site development and exploration activities represent a moderate and temporary disturbance that would primarily affect benthic invertebrates. The severity of the impacts would generally decrease dramatically with distance from bottom-disturbing activities. Recovery of benthic habitat could range from short-term to long-term.

Production. Production activities that could affect invertebrates include operational noise, bottom disturbance from the movement of mooring anchors, chains, and cables, and the release of process water. In addition, the platform and gravel islands would replace existing featureless soft sediments and serve as artificial reefs (Table 4.4.7-10).

Chronic disturbance to benthic invertebrates would result from the movement of anchors and chains associated with support vessels. Bottom disturbance would impact invertebrates in a manner similar to that described above for the exploration and site development phase. The disturbance would be episodic and temporary, but would last for the lifetime of the platform.

Produced water contains metals, hydrocarbons, salts, and radionuclides, and its discharge could contaminate habitat resulting in lethal and sublethal effects on invertebrates, particularly nonmobile benthic infauna. However, it is assumed that produced water would be reinjected into the well rather than discharged into the ocean. In addition, produced water discharges must comply with NPDES permit requirements regarding the discharge amount, rate, and toxicity, which would greatly reduce the impact to invertebrate communities (Section 4.4.7.5.2).

The presence of platforms or artificial islands would favor invertebrates requiring or preferring hard substrates, thus shifting community composition in some areas. The platform would likely increase shell material and organic matter in the sediments surrounding the platform, potentially resulting in a shift in benthic invertebrate community composition.

The results of the study Arctic Nearshore Impacts Monitoring in the Development Area funded by BOEM provide a good summary of the long-term changes to benthic communities resulting from oil and gas development in the Arctic. Boehm (2001) determined that

TABLE 4.4.7-10 Impacting Factors Potentially Affecting Invertebrates and Their Habitat in the Beaufort and Chukchi Planning Areas

	Life Stage Affected[a]		
Development Phase and Impacting Factor	Eggs	Larvae	Adults
Impacting Factors Common to All Phases			
Vessel noise	X	X	X
Vessel traffic	X	X	X
Hazardous materials	X	X	X
Solid wastes	X	X	X
Offshore lighting	X	X	X
Aircraft noise			
Offshore air emissions			
Onshore air emissions			
Aircraft traffic			
Miscellaneous platform discharges	X	X	X
Vessel discharges	X	X	X
Bottom disturbance from vessel anchors	X	X	X
Exploration and Development			
Seismic noise	X	X	X
Noise from drilling and construction	X	X	X
Bottom disturbance from drilling and placement of platforms, subsea wells, artificial islands, and pipelines	X	X	X
Discharge of drilling muds and cuttings	X	X	X
Production			
Production noise	X	X	X
Produced water discharge	X	X	X
Artificial reef	X	X	X
Decommissioning			
Platform removal (nonexplosive)	X	X	X

[a] Colors indicate impact level: white = negligible; blue = minor; yellow = moderate; red = major.

hydrocarbons in sediments (largely attributable to natural sources) were not readily bioavailable to marine filter feeders and deposit-feeders, and concluded that small incremental contaminant additions from future development activities are unlikely to cause immediate ecological harm to organisms in the Beaufort Sea study area. After reviewing tissue samples between 2000 and 2006, hydrocarbon and metals concentrations in invertebrates sampled near the Northstar development and Liberty Prospect area were found to be similar to or lower than invertebrate tissue levels found elsewhere in the world (Neff and Associates LLC 2010). No increase in hydrocarbons and metals in marine invertebrate tissues was attributable to oil and gas production, even for benthic infauna such as amphipods and clams. Concentrations of metals

and hydrocarbons in benthic invertebrates collected in the Boulder Patch were similar to concentrations in invertebrates collected elsewhere in the development area.

Overall, the effects of production activities on invertebrates are expected to be negligible.

Decommissioning. No explosive platform removals are anticipated under the proposed action. Nonexplosive removals (e.g., abrasive, mechanical, or diver cutters) would have negligible long-term impacts on invertebrates, although individuals associated with the platform would experience injury, mortality, and loss of habitat. Pipelines installed and anchored on the seafloor would be capped and left in place, although there is the potential for chronic sediment disturbance from pipeline movement. The changes to invertebrate communities resulting from the construction of artificial gravel islands would be permanent. Overall, impacts associated with decommissioning activities are expected to be negligible.

Accidents. See Section 4.4.6 for a general discussion of hydrocarbon spills in marine habitat and Section 4.4.7.5.2 for a discussion of their impacts on invertebrates. Hydrocarbons can cause both lethal and sublethal effects to marine invertebrates. Sublethal effects occur at lower concentrations and include reduced growth and/or fecundity, increased physiological stress, and behavioral changes that may reduce fitness and population size.

Accidental hydrocarbon releases can occur at the surface or at the seafloor, potentially affecting pelagic and benthic invertebrates. Most hydrocarbon releases would be rapidly diluted and are expected to primarily affect plankton, as most oil and gas would float above the sediment surface. Most accidental releases would be small, and any impacts would be sublethal except in the immediate vicinity of the spill where lethal concentrations of oil may be present. The impact magnitude of these oil spills on invertebrates is primarily a function of the invertebrate species and habitat affected. Impacts from spills would be greatest if a large spill occurred during a reproductive period or contacted a location important for spawning or growth such as intertidal and nearshore subtidal habitats. However, it is anticipated that only a small amount of shoreline would be affected by these smaller oil spills and would not, therefore, present a substantial risk to invertebrate populations. Impacts from small and large spills are expected to be temporary as oil is diluted and broken down by natural chemical and microbial processes.

Catastrophic Discharge Event. The PEIS analyzes a CDE of 1.4 to 2.2 million bbl in the Chukchi Sea and 1.7 to 3.9 million bbl in the Beaufort Sea (Table 4.4.2-2). A CDE oil spill could contaminate sediments and the water column for some distance around the leak or rupture. Most released oil and gas would float above the seafloor, so direct contact with benthic communities in deeper water should be relatively low. If large quantities of oil from a catastrophic oil spill were to reach intertidal sediments or shallow subtidal sediment, benthic invertebrates in the affected areas could experience high levels of contamination and mortality, and, given the slow rate of oil breakdown in the Arctic, benthic invertebrate populations could be depressed for many years. See Section 4.4.7.5.2 for a detailed discussion of oil spills on invertebrates following the catastrophic Exxon Valdez spill.

Hydrocarbon releases contacting the Stefansson Sound Boulder Patch community could have direct impacts on organisms inhabiting the area. The magnitude of impacts to the Boulder

Patch would depend on the location and severity of the spill. Studies show that the Boulder Patch communities are slow to recolonize (Konar 2007 and references therein). Kelp associated benthic animal communities have also been shown to have major shifts in species composition following exposure to oil (Dean and Jewett 2001). Impacts to kelp habitat from an oil spill could be long-term, but are not expected to be permanent. *Laminaria* beds oiled by the *Exxon Valdez* spill recovered within 10 years (Dean and Jewett 2001). Planning and permitting procedures requiring no impacts to sensitive biological communities will also minimize spill impacts to the Boulder Patch area.

Oil from a CDE occurring under ice is more difficult to locate and clean than surface spills. Since weathering would be greatly reduced by ice cover, pelagic invertebrates could continue to be harmed or killed as they drift into the trapped oil. In addition, invertebrates living beneath the ice are a crucial food source in the Arctic food web that could be degraded or lost by contact with oil spills.

4.4.7.5.4 Conclusion. The primary impacts of oil and gas activities on invertebrates in the GOM and Alaska Planning Areas would be from drilling waste discharges and from bottom-disturbing activities during the exploration and site development phase, which could displace, bury, injure, or kill invertebrates in the vicinity of the activities. Displaced invertebrate communities would generally repopulate the area over a short-period of time, although a return to the pre-disturbance community may take longer, particularly in the Arctic. Where floating platforms are used, scour from the movement of mooring structures represents a chronic disturbance to benthic invertebrates lasting the life of the production phase. If discharged into open water, the effects of drilling wastes and produced water on invertebrates would be localized and no population-level effects are expected. Changes in benthic invertebrate community structure and function should be restricted to the vicinity of the platform. Overall, activities conducted during exploration and site development, production, and decommissioning phases could result in moderate impacts to benthic and pelagic invertebrates. Bottom-disturbing activities would be temporary and recovery could be short-term to long-term. No permanent or population-level impacts to invertebrates are expected. Overall impacts from routine Program activities would range from negligible to moderate.

Small surface or subsurface hydrocarbon spills would be rapidly diluted and would likely result in only small localized, sublethal impacts to invertebrates. Large or CDE-level spills could affect a large number of benthic and pelagic invertebrates and their habitats. The location of the spill and the season in which the spill occurred would be important determinants of the impact magnitude of the spills. A large or CDE spill would likely contact shoreline areas, and benthic invertebrates in sensitive intertidal and shallow subtidal habitats could experience large-scale lethal and long-term sublethal effects. In Alaska, local populations of intertidal organisms affected by such large spills could be measurably depressed for several years and oil could persist in shoreline sediments for decades (especially in the case of a CDE spill). However, large or CDE spills are unlikely to occur, and invertebrates typically have short generation times and should recover.

4.4.8 Potential Impacts to Areas of Special Concern

4.4.8.1 Gulf of Mexico

4.4.8.1.1 Routine Operations.

Marine Protected Areas (MPAs). National System MPAs in the Western and Central Planning Areas consist of the FGBNMS, Jean Lafitte National Historical Park and Preserve, Barataria Preserve, and a number of National Wildlife Refuges (NWRs) (Table 3.9.1-1). MPAs would primarily be affected by pipeline landfalls and potentially by accidental oil spills occurring nearshore as well as large offshore oil spills. Impacts on the FGBNMS and NWRs are described below. *De facto* MPAs are primarily military use areas and are also discussed below.

National Marine Sanctuaries of Texas and Louisiana in the Western Gulf of Mexico Planning Area (Figure 3.9.1-1). Potential impacts on the FGBNMS resulting from site exploration and development activities are discussed in detail in (Section 4.4.6.2.1). Direct impacts on the FGBNMS from bottom disturbance would be prevented by the Topographic Features Stipulation, which prohibits exploration and development activities and the deposition of drilling muds and cuttings in the vicinity of the FGBNMS. During the production phase, produced water discharges are not likely to impact the FGBNMS because of the Topographic Features Stipulation requiring large buffers between the FGBNMS and oil and gas development activities (Section 4.4.6.2.1).

New oil and gas production platforms could act as artificial reef habitat and potentially act as stepping stones allowing the establishment of invasive species in the FGBNMS (Section 4.4.6.2.1). However, there is no conclusive evidence this has occurred historically, and it is more likely that invasive species would establish at the FGBNMS even without the platforms, although the platforms may speed the process.

National Parks, National Seashores, Reserves, and Refuges. See Section 4.4.6.1.1 for a discussion of the potential impacts of the Program on coastal habitats. It is assumed that pipeline landfalls, shore bases, and waste facilities would not be located in National Parks, NWR, or National Estuarine Research Reserves because of their special status and protections. Consequently, impacts to these areas from oil and gas exploration and production activities are not expected to occur.

It is possible that shore bases and waste facilities may be located in one or more estuaries in the Western or Central GOM Planning Area. It is assumed that new shore bases and waste facilities would be constructed in existing developed or upland areas and would not be sited in coastal habitats such as barrier beaches or wetlands. Therefore, impacts on parks, seashores, refuges, and reserves are not likely to occur.

Trash and debris from various sources, including OCS operations, frequently wash up on beaches, which could affect Gulf Shores or Padre Island National Seashore. The discharge or

disposal of solid debris from OCS structures and vessels is prohibited, and assuming that operators comply with regulations, most potential impacts would be avoided, although some accidental loss of materials is inevitable.

NPS lands, wildlife refuges, and research reserves could potentially be affected by increased boat and aircraft traffic associated with OCS oil and gas activities. Existing mitigation measures limit vessel speeds in inland waterways and aircraft altitudes over Areas of Special Concern. With these measures in place, most impacts on these Areas of Special Concern due to vessel and aircraft traffic would be avoided.

Military Uses. The Military Areas Stipulation applies to all blocks leased in military areas and requires lessees to coordinate their activities with the relevant military authorities and also states that the U.S. Government is not responsible for any accidents involving military operations. The Military Areas Stipulation reduces use conflicts and improves safety but does not reduce or eliminate the actual physical presence of oil and gas operations. Accidents and use conflicts involving oil and gas and military operations would be minimized or eliminated by adherence to the Military Areas Stipulation. Currently, both activities coexist in the GOM, and there has never been an accident involving the military and oil and gas lessees.

4.4.8.1.2 Accidents. It is assumed that up to 8 large spills (between 1,700 and 5,300 bbl), up to 70 spills between 50 and 999 bbl, and up to 400 smaller spills between 1 and 50 bbl could occur during the lease period under the proposed action. Small spills at the seafloor would rise in the water column but are not likely to contact the FGBNMS at concentrations toxic to marine life (see Section 4.4.6.2.1). Small platform spills and tanker spills at the ocean surface could penetrate the water column to documented depths of 20 m (66 ft) or more, which is within the depth range of the crests of some coral reefs and topographic features including the FGBNMS. However, at these depths, the contaminant concentrations are typically several orders of magnitude lower than those demonstrated to have an effect on marine organisms (MMS 2008a). Therefore, it is likely that only small concentrations of oil from surface spills would reach the FGBNMS (MMS 2008a).

An oil spill reaching sensitive coastal habitats could impact National Parks, NWRs, National Estuarine Research Reserves, or National Estuary Program sites. Impacts could result from both oiling of the shoreline and mechanical damage during the cleanup process. Small or large spills (>1,000 bbl) would be rapidly diluted and degraded by natural processes and, given the small size of most spills, impacts to a significant area of the shoreline are unlikely.

Catastrophic Discharge Event. This PEIS analyzes a CDE up to 7.2 million bbl in the GOM. It is possible that such a spill originating from outside the No Activity Zones established by the Topographic Features Stipulations could reach the vicinity of the FGBNMS. However, because of the tendency for oil components to rise toward the surface and to be diluted as they are transported by water currents, any impacts associated with a large or catastrophic spill reaching sensitive corals would most likely be sublethal. Hydrocarbons have been shown to have lethal and sublethal (reproduction, larval settlement, photosynthesis, and feeding) effects on corals, although no effects on corals following oil spills are also frequently reported (Loya and

Rinkevich 1980; Bak 1987; Guzman et al. 1991; Dodge et al. 1995; Haapkyla et al. 2007). Corals have the capacity to recover quickly from hydrocarbon exposure. For example, Knap et al. (1985) found that when *Diploria strigosa*, a common massive brain coral at the Flower Garden Banks, was dosed with oil, it rapidly exhibited sublethal effects but also recovered quickly. However, larval stages of coral are far more sensitive than adults. Therefore, the impact magnitude of a spill is partly dependent on whether the spill occurs during a period of coral spawning. For lethal exposures, the community would likely recover once the area had been cleared of oil, although full recovery could take many years (Haapkvla et al. 2007). Consequently, it is anticipated that impacts of lethal concentrations of oil reaching coral reef or hard-bottom habitat would be long-term but temporary.

A CDE taking place near shore or in deeper water could affect coastal parks, reserves, and refuges if the oil was transported to these areas by currents. Impacts on parks, preserves, and refuges would depend on the size and specific location of the oil spill and the effectiveness of cleanup procedures. If a large volume of heavy oil were to reach these areas, that situation could result in park closure and reduced visitation. In general, oil spills affecting parks, refuges, and reserves would diminish their function by reducing habitat value for wildlife and aquatic biota and interrupting monitoring and research activities.

The impacts of oil spills on parks, preserves, and refuges could include death of wetland vegetation and associated wildlife, oil saturation and trapping by vegetation and sediments (thus causing it to become a chronic source of pollution), and mechanical destruction of the wetland area during cleanup. Spills that damage wetland vegetation protecting canal and waterway banks could accelerate erosion of those banks (see Section 4.4.6.1.1). Some areas may recover completely if proper remedial action was taken. Others may not recover completely. Oil could remain in some coastal substrates for decades, depending on the type of oil spilled, the amount present, sand grain size, the degree of penetration into the subsurface, the exposure to the weathering action of waves, and sand movement onto and off the shore. See Section 4.4.6.1.1 for a discussion of the potential impacts of oil spills on coastal habitats.

4.4.8.2 Alaska – Cook Inlet

4.4.8.2.1 Routine Operations.

Marine Protected Areas (MPAs). The Alaska Peninsula unit and Gulf of Alaska unit of the Alaska Maritime NWR are the only Federal MPAs in the vicinity of the Cook Inlet Planning Area. NWRs could primarily be affected by pipeline landfalls and potentially by accidental oil spills, as described below.

National Parks, National Forests, National Seashores, Reserves, and Refuges. Impacts on National Parks, Forests, Reserves, and Refuges could result from facilities developed to support offshore oil drilling and production, and could include effects from pipeline landfall; dredging and construction; and the construction of roads, processing and waste facilities, and onshore pipelines. In addition, subsistence hunting and fishing, which are permitted on all

refuges in Alaska, could be affected by oil and gas operations. It is assumed that pipeline landfalls, shore bases, and waste facilities would not be located in National Parks, National Forests, NWRs, or National Estuarine Research Reserves because of the special status and protections afforded these areas. See Section 4.4.6.1.2 for a discussion of the potential impacts of OCS oil and gas activities on coastal habitats.

National Park Service (NPS) lands are potentially susceptible to impacts from activities related to OCS oil and gas development as a consequence of the Program in Cook Inlet. The potentially affected lands include the Lake Clark National Park and Preserve, the Katmai National Park and Preserve, and Aniachak National Monument. Kenai Fjords National Park is east of Cook Inlet on the GOA, but it could be affected by an oil spill associated with OCS activities in Cook Inlet.

Impacts from routine OCS operations could come from facilities developed to support oil drilling and production, and could include effects from pipeline landfalls, dredging, air pollution, and the construction of roads and new facilities. Onshore oil facilities are permissible only on private acreage within each national park land. All of these national parks, monuments, and preserves contain privately held acreage, and development of onshore oil support facilities is possible in these areas. Because of the more confined nature of Cook Inlet, OCS construction of facilities within the Cook Inlet Planning Area could have some negative effects on scenic values for some users of the Lake Clark and Katmai National Parks and Preserves, if the facilities were visible from shore or the air during flightseeing.

Noise and vessel traffic associated with construction activities in offshore areas adjacent to park and refuge boundaries could temporarily disturb some wildlife and could negatively affect recreational values for park users. It is anticipated that noise generated by offshore construction activities would be at low levels, intermittent, and would not occur for more than a few months. Scenic values for some park users could be negatively affected in the long term by the presence of platforms visible from park areas.

National Wildlife Refuges (NWRs) in the vicinity of Cook Inlet are identified in Section 3.9.2.2. NWRs potentially affected by OCS activities in the Cook Inlet Planning Area include the Alaska Peninsula NWR, Becharof NWR, Kodiak NWR, Kenai NWR, and Izembek NWR. Section 22(g) of the Alaska Native Claims Settlement Act of 1971 (ANCSA) requires that new development on National Wildlife Refuge lands must be in accordance with the purpose for which the refuge was formed. Therefore, although development of onshore oil and gas support facilities is technically possible, such projects would be subject to intensive review. The potential effects of routine operations and accidental events on these NWRs are essentially the same as those discussed above for the NPS lands. Noise and vessel traffic associated with construction activities in offshore areas adjacent to park and refuge boundaries could temporarily disturb some wildlife and could negatively affect recreational values for park users. It is anticipated that noise generated by offshore construction activities would be at low levels, intermittent, and would not occur for more than a few months. Scenic values for some park users could be negatively affected in the long term by the presence of platforms visible from park areas. In addition, subsistence hunting and fishing are permitted on all refuges in Alaska and

could, therefore, be affected by accidents and routine operations in the immediate vicinity of refuge properties.

The only national forest within the vicinity of the Cook Inlet Planning Area is the Chugach National Forest, which is located mainly on the eastern side of the Kenai Peninsula (Figure 3.9.2-1). Because there would be no OCS-related development, such as pipelines or other onshore facilities, within the Chugach National Forest, it would not be affected by routine OCS activities associated with lease sales in the Cook Inlet Planning Area. The Chugach National Forest also borders Prince William Sound and is close to Valdez. The Chugach National Forest is, therefore, potentially susceptible to effects of routine oil-related operations from transport and tanker loading of oil produced (OCS and non-OCS) in other regions (e.g., the Beaufort Sea Planning Area) and transported by pipeline to the Port of Valdez. Potential effects include increased noise and air pollution from tanker traffic.

Other Areas of Special Concern. There are multiple State parks and State recreation areas near the Cook Inlet Planning Area, many of which border Cook Inlet or are located in areas that could be contacted by accidental oil spills. Such areas include Captain Cook State Recreation Area, Clam Gulch State Recreation Area, Chugach State Park, Kachemak Bay State Park and State Wilderness Park, and Ninilchik State Recreation Area. In addition, the Kachemak Bay National Estuarine Research Reserve is located in Cook Inlet on the southern end of the Kenai Peninsula. Impacts from OCS activities would be similar to those described above for National Parks and Refuges. Existing protections and restrictions on uses should limit the direct terrestrial impacts from OCS activities on these areas. It is assumed that pipeline landfalls, shore bases, and waste facilities would not be located in the State parks and recreation areas. It is anticipated that noise generated by OCS offshore construction activities would be at low levels, intermittent, and would not persist for more than a few months at any one time. It is considered unlikely that these additional activities would noticeably affect wildlife or park user values compared to current (non-OCS) activities within the considered planning areas. There are no Military Use Areas in the Cook Inlet Planning Area; therefore, no conflicts between OCS activities and the military are expected to occur.

4.4.8.2.2 Accidents. Accidental oil spills could occur from land-based pipelines and facilities, vessels, and offshore platforms and pipelines. It is assumed that 2 small spills between 50 and 999 bbl and 10 smaller spills between 1 and 50 bbl could occur under the proposed action. It is assumed that one large spill between 1,500 and 7,800 bbl could occur in Cook Inlet.

Spills on land are not likely to affect National Parks, Refuges, or National Forests because pipelines and other oil and gas infrastructure would not likely be permitted in these areas. However, there are several NWRs and National Parks along the shorelines of the Cook Inlet Planning Area, as well as one National Estuarine Research Reserve, and coastal areas of all could be significantly affected by large or catastrophic spills. A section of the Chugach National Forest borders Turnagain Arm and could be affected by spills originating in Cook Inlet as well as tanker spills associated with the Port of Valdez. The Lake Clark National Park and Preserve has approximately 50 km (31 mi) of shoreline along Cook Inlet, including shoreline areas in Tuxedni and Chinitna Bays that are considered to contain sensitive habitats. Katmai National Park and

Preserve also contains extensive shoreline in proximity to the Cook Inlet Planning Area and the Shelikof Strait, and it is also adjacent to Katmai Bay, which is considered a sensitive resource area. If a large amount of oil were to contact a National Park, visitation would be likely to decrease or be temporarily prohibited. The several NWRs located in and around Cook Inlet, such as the Kodiak NWR and the Alaska Maritime NWR, could also experience a loss of habitat value if they experienced heavy oiling from offshore spills. Site-specific evaluations would be conducted to fully evaluate potential spill trajectories and spill probabilities in a lease sale EIS.

Several State parks and recreational areas border Cook Inlet and could be affected by accidental releases of oil spilled from onshore facilities and offshore drilling rigs. An oil spill contacting shoreline habitats could affect subsistence harvests in those parks in which recreation and subsistence hunting and fishing are allowed and could affect the number of park visitors. Impacts would depend primarily on the spill location, size, and time of year.

Catastrophic Discharge Event. The PEIS analyzes the impacts of a CDE up to 125,000 bbl in the Cook Inlet Planning Area. If a large volume of oil were to reach the shoreline following a catastrophic spill, NWRs could suffer a reduction in their primary function, which is to support wildlife and aquatic biota. Given the cold temperatures in Alaska, oil could contaminate nearshore refuge habitats for several years to decades and result in lethal and long-term sublethal impacts to refuge biota. Impacts would depend primarily on spill location, spill size, and timing of the spill. In general, directly affected coastal fauna would include marine mammals; fishes that reproduce in, inhabit, or migrate through coastal areas; terrestrial mammals that forage on fish; and marsh and seabirds that use these habitats for nesting and/or foraging. Spilled oil could also affect subsistence harvests in those parks in which subsistence hunting and fishing are allowed. See Sections 4.4.6.1.2 and 4.4.6.1.3 for a description of potential impacts of catastrophic oil spills on coastal areas and biota. Oil could contaminate nearshore habitats for several years to decades and result in lethal and long-term sublethal impacts on refuge biota (Short et al. 2007; Taylor and Reimer 2008; *Exxon Valdez* Oil Spill Trustee Council 2010c). The degree of effects and length of recovery depend on a number of factors such as the type of oil, extent of biota exposure, substrate type, degree of sediment contamination, time of year, and species sensitivity (NOAA 1998; Hayse et al. 1992; Hoff 1995). Sheltered intertidal areas are particularly slow to recover. More than 20 years after the *Exxon Valdez* oil spill, intertidal communities were considered to be recovering, but had not yet fully recovered from the effects of the spill (*Exxon Valdez* Oil Spill Trustee Council 2010a).

4.4.8.3 Alaska – Arctic

4.4.8.3.1 Routine Operations.

Marine Protected Areas (MPAs). The Arctic National Wildlife Refuge (ANWR) and the Chukchi Sea unit of the Alaska Maritime National Wildlife Refuge are the two Federal system MPAs in or adjacent to the Beaufort and Chukchi Planning Areas, and are described in Section 3.6.5.1. NWRs could primarily be affected by pipeline landfalls and potentially by accidental oil spills, as described below.

National Forests, Parks and Refuges. There are no National Forests in the vicinity of the Beaufort and Chukchi Sea Planning Area; therefore, no impacts on U.S. Forest Service lands are expected. Impacts on NWRs could result from facilities developed to support offshore oil drilling and production, and could include effects from onshore pipelines and pipeline landfalls, dredging and construction, air pollution and the construction of roads, and processing and waste facilities. In addition, subsistence hunting and fishing, which are permitted on all NWRs in Alaska, could be affected by OCS activities. See Section 4.4.6.1.3 for a discussion of the potential impacts of the Program on coastal habitats. Oil facility development currently is prohibited on the ANWR and is discretionary on all other NWRs within Alaska. Although numerous refuge lands have been conveyed to private ownership and Native corporations, Section 22(g) of ANCSA requires that new development on these lands must be in accordance with the purpose for which the refuge was formed. Therefore, development of onshore oil and gas support facilities, though technically possible, would be subject to an exhaustive environmental review process. Therefore, it is currently considered unlikely that onshore oil and gas activities would be developed on refuge lands. Indirect impacts resulting from OCS activities, such as noise pollution or emissions associated with transportation of oil from adjacent planning areas, could occur but would be unlikely to have substantial effects on resources within refuge boundaries.

The Iñupiat Heritage Center, located in Barrow, Alaska, is the only NPS-managed area along the coast of the Beaufort and Chukchi Planning Areas. The area is already urbanized and would not be adversely affected by OCS activities. Although not an NPS land, the National Petroleum Reserve is managed by BLM and has a large shoreline component that borders the Chukchi Sea. Cape Krusenstern National Monument and the Bering Land Bridge National Preserve are south of the Chukchi Planning Area. Although oil transport through the Cape Krusenstern National Monument is permitted under the ANCSA and an existing road is present that could be used to access or create support facilities, such development is considered unlikely under the proposed action. Onshore oil and gas development within the boundaries of the Bering Land Bridge National Preserve is also considered to be unrealistic. Consequently, there are likely to be no effects in either of these National Parks from the proposed action.

4.4.8.3.2 Accidents. It is assumed that up to 3 large oil spills between 1,700 and 5,100 bbl, up to 35 small spills (50 to 999 bbl) and up to 190 smaller spills (>1 and <50 bbl) could occur during the lease period under the proposed action. Oil spills can occur from offshore drilling platforms, from vessels, or from pipelines located onshore and offshore. OCS infrastructure and activities are not likely to be permitted in NPS lands or in NWRs. Therefore, impacts to these areas from onshore pipeline spills are not likely. While small oil spills would likely only have limited influence on potentially affected resources within these refuges, a large spill could result in more drastic effects on coastal habitats and fauna.

Catastrophic Discharge Event. This PEIS analyzes the impacts of a CDE up to 2.2 million bbl in the Chukchi Sea Planning Area and 3.9 million bbl in the Beaufort Sea Planning Area (Table 4.4.2-2). Large catastrophic oil spills from offshore pipelines or platforms could potentially contact shoreline habitats and communities in NWRs and NPS lands. However, Cape Krusenstern National Monument and the Bering Land Bridge National Preserve

are located more than 322 km (200 mi) south of the Chukchi Sea Planning Area and are therefore unlikely to be adversely affected by accidental spills occurring offshore in the Beaufort and Chukchi Seas. The Arctic NWR and the Chukchi Sea unit of the Alaska Maritime NWR would be susceptible to oil spilled from subsea pipelines or drilling platforms.

If a large volume of heavy oil were to reach the shoreline following a catastrophic spill, NWRs could suffer a reduction in their primary function which is to support wildlife and aquatic biota. Given the cold temperatures in Alaska, oil could contaminate nearshore refuge habitats for several years to decades and result in lethal and long-term sublethal impacts to refuge biota. Impacts would depend primarily on spill location, spill size, and timing of the spill. In general, directly affected coastal fauna would include marine mammals; fishes that reproduce in, inhabit, or migrate through coastal areas; terrestrial mammals that forage on fish; and marsh and seabirds that use these habitats for nesting and/or foraging. Spilled oil could also affect subsistence harvests in those parks in which subsistence hunting and fishing are allowed. See Section 4.4.6.1.3 for a description of potential impacts of catastrophic oil spills on coastal areas and biota.

4.4.8.4 Conclusion

Overall, impacts on areas of special concern resulting from routine Program activities are expected to be negligible to moderate because of the existing protections and use restrictions applicable to these areas. However, increased vessel and aircraft traffic and the construction of pipelines and platforms could have temporary and localized effects on wildlife and reduce the scenic value of National Parks and NWRs for some visitors.

Impacts on areas of special concern from hydrocarbon spills are unlikely because most spills would be small. Should oil from large or CDE-level spills reach an area of special concern, the impacts would depend on the location and size of the spill, the type of product spilled, weather conditions, the type of area affected, the effectiveness of cleanup operations, and other environmental conditions at the time of the spill. Although unlikely, if oil from a large or CDE spill were to reach an area of special concern, coastal habitats and fauna, as well as subsistence use, commercial or recreational fisheries, and tourism, could be negatively affected (especially in the case of a CDE spill). In Alaska, oil in some coastal habitats would likely persist for multiple years.

4.4.9 Potential Impacts on Population, Employment, and Income

4.4.9.1 Gulf of Mexico

4.4.9.1.1 Routine Operations. Under the proposed action alternative, between 200 and 400 new platforms would be located in the GOM over the 40-year planning period. Using impact estimates provided by the MAG-PLAN Model (MMS 2006b), Table 4.4.9-1 shows total

TABLE 4.4.9-1 Average Annual Impacts of the Proposed Action (Alternative 1) on Regional Employment and Income[a]

Area	Employment	Income
Alabama		
Low	350	15
High	800	35
Florida		
Low	950	45
High	2,150	95
Louisiana		
Low	7,500	350
High	16,500	765
Mississippi		
Low	225	10
High	525	25
Texas		
Low	10,900	630
High	22,000	1,270
Total GOM region		
Low	20,000	1,050
High	41,825	2,180

[a] Totals may not add due to rounding. All estimates are totals of direct, indirect, and induced impacts. Employment estimates are in employee years; personal income estimates are in millions of 2010 dollars.

Source: BOEMRE 2011.

(direct, indirect, and induced) employment and regional income for the Labor Market Areas (LMAs) in each State in the GOM coast region (see Section 3.10). Average annual impacts of the proposed action in the GOM coast region would be between 20,000 and 41,825 jobs, which would amount to less than 1% of total GOM coast regional employment. Between $1,050 million and $2,180 million in income would be produced. The largest employment impacts would be in Texas, ranging from 10,900 to 22,000, with smaller impacts in Louisiana, where the employment created would range from 7,500 to 16,500 jobs. Income impacts in these States would range between $630 million and $1,270 million in Texas and between $350 million and $765 million in Louisiana. Employment impacts are lower in the other GOM coast States; the total number of jobs created would be between 950 and 2,150 in Florida, between 350 and

800 in Alabama, and between 225 and 525 in Mississippi. Although only a small amount of OCS oil and gas activity is proposed for the Eastern Planning Area, economic impacts would occur in Florida associated with expenditures on material and equipment supplied by sectors located in Florida, and the and use of ports and infrastructure for the associated transportation.

The additional jobs would create small but noticeable increases in the population of these regions. Using a historically observed ratio of 2.59 persons per new job (MMS 2006b), population increases of between 28,231 and 56,980 would be expected in Texas on average in each year of the proposed action, with increases of between 19,425 and 42,735 occurring in Louisiana. Smaller increases in population of between 2,461 and 5,569 per new job would occur in Florida, with increases of between 907 and 2,072 in Alabama, and between 583 and 1,360 in Mississippi.

Installation and operation of new offshore oil and gas platforms have the potential to impact property values in coastal areas within viewing distances of offshore activities. However, although the extent of the impact of any given platform would vary according to distance to shore, location within a maximum viewing range, and regional visibility conditions, the impact of additional platforms on coastal property values in areas where there is substantial existing offshore oil and gas is likely to be relatively small. There are currently 3,679 offshore platforms in the Western and Central Planning Areas in Federal waters in the GOM. Under the proposed action alternative, between 200 and 450 platforms would be added over the 40-year planning period, an average of between five and ten platforms per year. It is also anticipated that between 150 and 275 platforms would be removed over the same period. Although the location of additional offshore platforms is not known, with some new platforms conceivably located in areas of the GOM with relatively little existing oil and gas development, the majority of new platforms are likely to be located in areas already hosting existing platforms. Given these considerations, it is likely that the impacts of oil and gas development under the proposed action would only have a minor impact on property values in coastal areas in the GOM.

4.4.9.1.2 Accidents. Up to 8 large spills greater than 1,000 bbl, between 35 and 70 spills between 50 and 1,000 bbl, and up to 400 small spills less than 50 bbl could occur in the GOM from the proposed action. It is expected that many of these spills will occur in deepwater areas located away from the coast, based on the established trend for greater oil production activity to move into deepwater located for the most part at a substantial distance from the coast.

In previous oil spill analyses, there is a less than 0.5% probability that an oil spill greater than or equal to 1,000 bbl would reach the shores of the majority of coastal counties and parishes in Texas and Louisiana within 10 days of a spill occurring over the 40-yr leasing period in the Western and Central Planning Areas (BOEMRE 2005). Six counties in Texas and one parish in Louisiana have a 1–5% chance of an OCS offshore oil spill greater than or equal to 1,000 bbl reaching their shoreline within 10 days. BOEM also estimates that between 5 and 15 chemical spills associated with the OCS program are anticipated each year, with a small percentage of these associated with the proposed action. The majority of spills are expected to be less than 50 bbl in size; a chemical spill of greater than or equal to 1,000 bbl as a result of the proposed action is very unlikely.

The immediate socioeconomic impact of a larger oil spill would include the loss of employment, income, and property value; increased traffic congestion; increased cost of public service provision, and possible shortages of commodities or services. In the short term, the impacts of a spill are expected to be modest, measured in terms of projected cleanup expenditures and the number of people employed in cleanup and remediation activities. Longer-term impacts may be more substantial if fishing, shrimping, oystering, and/or tourism were to suffer due to the real or perceived impacts of the spill, or if there were substantial changes to the energy industries in the region as a result of the spill.

The employment and regional income impact from an oil spill would likely be greatest in Texas and Florida, with the highest concentration of tourism-related employment occurring in Florida, particularly in the Miami and Tampa-St. Petersburg areas and the Houston-Galveston areas. In the Central GOM Planning Area, the New Orleans area would also be affected due to their high concentration of tourism-related employment. Net employment impacts from a spill are not expected to exceed 1% of baseline employment for any LMA in any given year, even if they are included with employment associated with routine oil and gas development activities associated with the proposed action.

Catastrophic Discharge Event. The PEIS analyzes a CDE up to 7.2 million bbl (Table 4.4.2-2). The socioeconomic impact of a CDE would include the loss of employment, income, and possible shortages of commodities or services in both coastal and inland areas. In coastal areas, losses of property value and increased traffic congestion could also occur, with increases in the cost of public service provision also possible. In the short term, impacts of a CDE, measured in terms of projected cleanup expenditures and the number of people employed in cleanup and remediation activities, would be expected to be large. Longer-term impacts may also be substantial if fishing activities and tourism were to suffer as a result of the real or perceived impacts of the event, or if there were substantial changes to energy industries in the region as a result of the event.

4.4.9.2 Alaska – Cook Inlet

4.4.9.2.1 Routine Operations. Under the proposed action alternative, between 1 and 3 new platforms would be located in Cook Inlet over the 40-year planning period. Table 4.4.9-2 shows total (direct, indirect, and induced) employment and regional income in Alaska and the rest of the United States. Average annual impacts of the proposed action in the Alaska region would be between 302 and 575 jobs, which would amount to less than 5% of total Alaska employment. An additional 567 to 1,431 jobs would be created in the rest of the United States. Personal income would increase by between $25.4 million and $52.9 million annually in Alaska, and by between $27.0 million and $69.1 million in the rest of the United States.

Based on current trends, it is assumed that most of the workers directly associated with OCS oil and gas activity will work offshore or onshore in worker enclaves separated from local communities, and that most OCS workers will likely commute to work sites from Alaska's larger population centers or from outside the immediate area. It is also assumed that OCS jobs would

TABLE 4.4.9-2 Average Annual Impacts of the Proposed Action (Alternative 1) on Regional Employment and Income[a]

Area	Employment	Income
Cook Inlet		
Low	302	25.4
High	575	52.9
Rest of United States		
Low	567	27.0
High	1,431	69.1

[a] All estimates are totals of direct, indirect, and induced impacts. Employment estimates are in employee years; labor income estimates are in millions of 2010 dollars.

be available to the local populations in all areas, but that rural Alaskan employment in the petroleum industry, especially among Alaska Natives, will remain relatively low.

Many workers on oil rigs in the Cook Inlet Planning Area (and onshore oil and gas facilities on the Kenai Peninsula and the North Slope) currently live in Anchorage or on the Kenai Peninsula. The larger populations and more diverse economies of south central Alaska compared to other Alaskan communities will tend to lessen the potential effect of proposed leasing on their economies. As a result, employment generated by OCS activity in the Cook Inlet Planning Area at its peak is only expected to account for less than 5% of total Alaska employment.

Installation and operation of new offshore oil and gas platforms have the potential to impact property values in coastal areas within viewing distances of offshore activities. However, although the extent of the impact of any given platform would vary according to distance from shore, location within a maximum viewing range, and regional visibility conditions, the impact of additional platforms on coastal property values in areas where there is substantial existing offshore oil and gas is likely to be relatively small. Under the proposed action alternative, between one and three platforms would be added over the 40-yr planning period. It is also anticipated that between one and three platforms would be removed over the same period. Although the location of additional offshore platforms is not known, with some new platforms conceivably being located in areas of the Cook Inlet area, the majority of new platforms are likely to be located in the vicinity of areas already hosting existing platforms. Given these considerations, it is likely that the impacts of oil and gas development under the proposed action would only have a minor impact on property values in coastal areas in the Cook Inlet area.

4.4.9.2.2 Accidents. One large spill greater than 1,000 bbl, up to 3 spills between 50 bbl and 1,000 bbl, and up to 15 small spills less than 50 bbl could occur in the Cook Inlet Planning Area under the proposed action. Although an oil spill could occur anywhere in the lease sale area, cleanup-related employment would likely occur in the area directly affected, generally in locations remote from communities. The hiring of cleanup workers will likely draw from labor markets in both the region and the rest of Alaska. Oil spills will generate only temporary employment (and population) increases during cleanup operations, because such operations are expected to be of short duration. Employment generated by spills will be a function of the size and frequency of spills.

Catastrophic Discharge Event. The PEIS analyzes a CDE of 75 to 125 thousand bbl (Table 4.4.2-2). The socioeconomic impact of a CDE would include the loss of employment, income, and possible shortages of commodities or services in both coastal and inland areas. In coastal areas, losses of property value and increased traffic congestion could also occur, with increases in the cost of public service provision also possible. In the short term, impacts of a CDE, measured in terms of projected cleanup expenditures and the number of people employed in cleanup and remediation activities, would be expected to be large. Longer-term impacts may also be substantial if fishing activities and tourism were to suffer as a result of the real or perceived impacts of the event, or if there were substantial changes to energy industries in the region as a result of the event.

4.4.9.3 Alaska – Arctic

4.4.9.3.1 Routine Operations. Under the proposed action alternative, between one and five new platforms would be located in the Chukchi Sea and one and four platforms in the Beaufort Sea over the 50-yr planning period. Table 4.4.9-3 shows the potential effects of the proposed action alternative in the Arctic region and the rest of the United States. Average annual impacts of the proposed action in the Arctic region would be between 1,466 to 3,646 jobs, which would amount to less than 1% of total Alaska employment. An additional 3,759 to 10,083 jobs would be created in the remainder of the United States. Personal income would increase by between $136.1 million and $329.8 million annually in the Arctic region and between $156.6 million and $398.2 million in the rest of the United States.

Most of the workers directly associated with OCS oil and gas activity will work offshore or onshore in worker enclaves separated from local communities, and most workers will likely commute to work sites from Alaska's larger population centers, including Anchorage and Fairbanks, or from outside Alaska (MMS 2006b). While OCS jobs would be available to the local populations in all areas, rural Alaskan employment in the petroleum industry, especially among Alaska Natives, would likely remain relatively low.

Employment in the North Slope oil and gas industry has little direct impact on the communities of the North Slope Borough. While actively working, most North Slope oil and gas workers stay in enclave housing separate from local communities, permanently residing in south central Alaska (Anchorage, the Kenai Peninsula Borough, and the Matanuska-Susitna Borough),

TABLE 4.4.9-3 Average Annual Impacts of the Proposed Action (Alternative 1) on Regional and National Employment and Income[a]

Area	Employment	Income
Beaufort Sea		
Low	800	72.0
High	2,052	192.1
Chucki Sea		
Low	667	64.1
High	1,594	137.7
Rest of United States		
Low	3,759	156.6
High	10,083	398.2

[a] All estimates are totals of direct, indirect, and induced impacts. Employment estimates are in employee years; labor income estimates are in millions of 2007 dollars.

or the Fairbanks area, and commute to their homes (or other locations) when not working. As population, employment, and income impacts affect the regional economies in which employees permanently reside, BOEM has not included these impacts in the discussion of impacts of the proposed action in the Arctic region.

The most important benefit of oil and gas development in the Arctic region is revenue from taxation of oil industry facilities. Although jurisdictions in the North Slope Borough and Northwest Arctic Borough are unable to tax offshore OCS facilities, the borough collects property tax revenue from new onshore pipelines and other facilities. The borough also receives indirect benefits from Alaska Native corporation investments in petroleum service companies. The effects of the proposed action on employment and income in Arctic region communities are likely to be significant, especially when combined with the continued decline in Prudhoe Bay and other North Slope production areas, and continued OCS production would allow jurisdictions in the Arctic region to maintain revenue collection from onshore facilities associated with continued offshore production.

4.4.9.3.2 Accidents. Up to 3 large spills greater than 1,000 bbl, 10 and 35 spills between 50 and 1,000 bbl, and up to 190 small spills of less than 50 bbl could occur in the Beaufort and Chukchi Sea area from the proposed action. Although an oil spill could occur anywhere in the lease sale area, cleanup-related employment would likely occur in the area directly affected, generally in locations remote from communities. The hiring of cleanup workers would have a regional and State of Alaska emphasis. Oil spills will generate only temporary employment (and

population) increases during cleanup operations, because such operations are expected to be of short duration. Employment generated by spills will be a function of the size and frequency of spills. Large spills of over 1,000 bbl would generate 60 to 90 jobs for up to 6 months and would generate moderate local effects (BOEMRE 2008).

Catastrophic Discharge Event. The PEIS analyzes a CDE of 1.4 to 2.2 million bbl in the Chukchi Sea and 1.7 to 3.9 million bbl in the Beaufort Sea (Table 4.4.2-2). The socioeconomic impact of a CDE would include the loss of employment, income, and possible shortages of commodities or services in both coastal and inland areas. Losses of property value could also occur in coastal communities, with increased cost of local public service provision also possible. In the short term, impacts of a CDE, measured in terms of projected cleanup expenditures and the number of people employed in cleanup and remediation activities, would be expected to be large. Longer-term impacts would likely be small, unless recreational activities and tourism suffered as a result of the real or perceived impacts of the event, or if there were substantial changes to energy production in the region as a result of the event.

4.4.9.4 Conclusions

Routine Program activities would result in negligible impacts in the GOM from small increases in population, employment, and income, and in minor impacts in the Alaska Planning Areas. In the GOM, increases in population, employment, and income would increase by less than 1% of baseline levels, and by less than 5% in Alaska.

Small accidental oil spills would have little socioeconomic impact. In contrast, large and especially CDE-level spills could result in the loss of employment, income, and possible shortages of commodities or services in both coastal and inland areas affected by the spill. Losses of property value could also occur in coastal communities, with increased cost of local public service provision also possible. In the short term, impacts of a CDE, measured in terms of projected cleanup expenditures and the number of people employed in cleanup and remediation activities, would be expected to be large. Longer-term impacts would likely be small, unless recreational activities and tourism suffered as a result of the real or perceived impacts of the event, or if there were substantial changes to energy production in the region as a result of the accidental spill; this would be more likely in the event of a CDE spill.

4.4.10 Potential Impacts to Land Use and Infrastructure

The development of oil and gas facilities within the GOM, the Cook Inlet, and the Arctic would have both direct and indirect impacts on existing and future land use, development patterns, and infrastructure. Impacts of routine activities of the Proposed Action Alternative are presented below. These routine activities include seismic explorations and exploratory drilling, onshore and offshore construction, normal operations, and decommissioning. Impacts on land use and infrastructure potentially resulting from an accident (an oil spill or release) occurring in the three areas also are presented. In general, the nature and magnitude of these impacts would

depend upon the level and location of new construction, the degree to which the area is already developed, and, in the case of accidental spills, the size and location of the spill.

Table 4.4.10-1 provides a summary of the resource receptors that pertain to routine activities. As shown in this table, potential receptors include the following:

- Land use categorization,
- Land use plans and initiatives,
- Development patterns, and
- Onshore infrastructure.

Conceptual models illustrated in Figures 4.4.10-1 through 4.4.10-3 show how various activities associated with seismic surveys, onshore and offshore construction, and normal oil and gas operations may impact land use, development patterns, and infrastructure. These figures are applicable to the GOM, the Cook Inlet, and the Arctic.

As shown in these figures, the potential effects of oil and gas activities typically include the following:

- Incompatibility with local land use/comprehensive planning patterns,
- Incompatibility with existing/planned development,
- Loss of use (intended or perceived) to existing landowners or users, and

TABLE 4.4.10-1 Impacting Factors Associated with Each Phase of Oil and Gas Activities[a]

	O&G Activities Phase				
	Exploration				
Resource Receptor Category Potentially Affected	Seismic Survey	Exploratory Wells	Development/ Construction	Production/ Normal Operations	Decommissioning
Land use categorization	I	I	X	I	X
Land use plans/initiatives	I	I	X	I	X
Development patterns	I	I	X	I	X
Onshore infrastructure	I	I	X	I	X

[a] I = Indirect impacts are anticipated; X = Both direct and indirect impacts are anticipated.

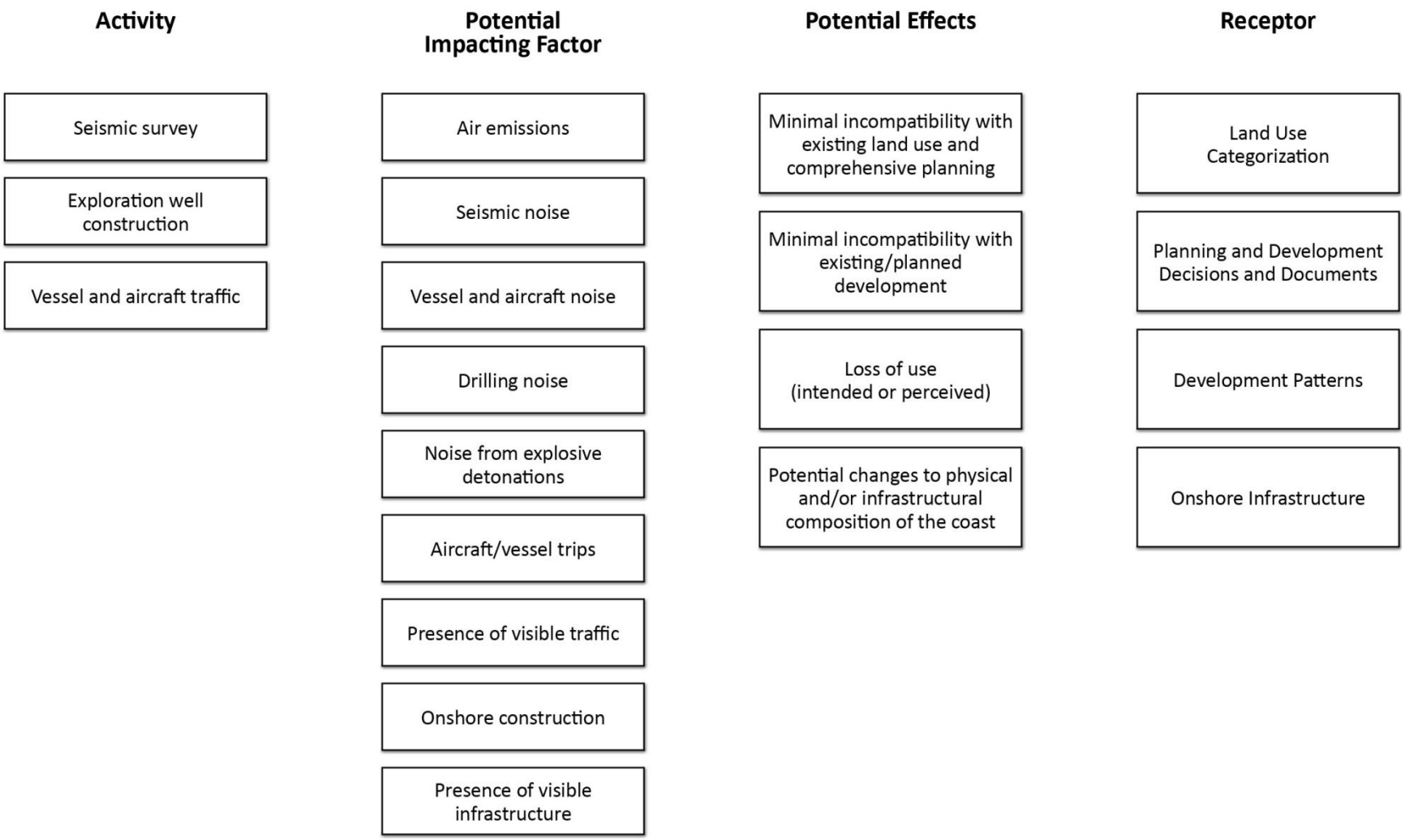

FIGURE 4.4.10-1 Conceptual Model for Potential Direct and Indirect Effects of Seismic Survey Activities on Land Use, Development Patterns, and Infrastructure

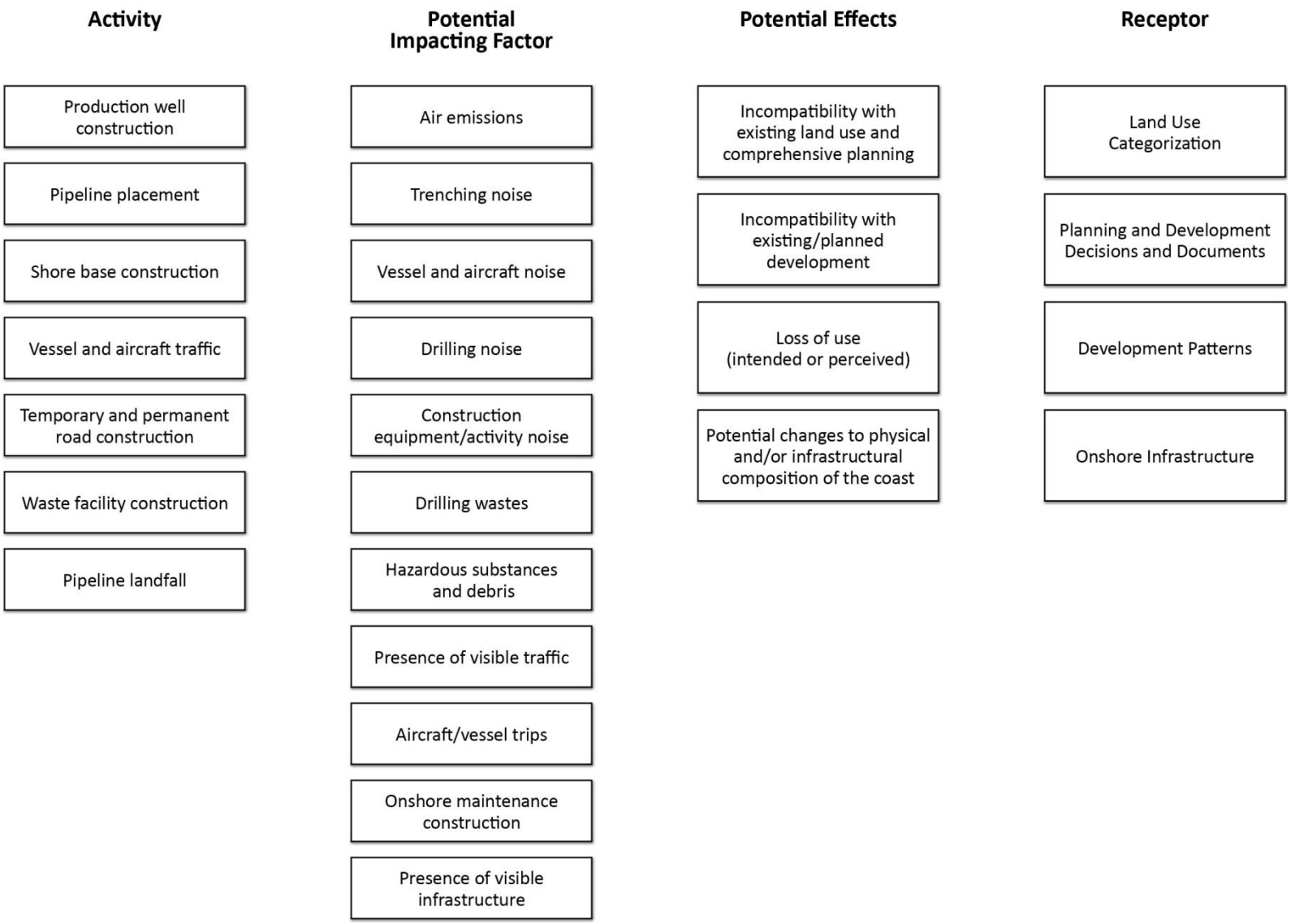

FIGURE 4.4.10-2 Conceptual Model for Potential Direct and Indirect Effects of Onshore/Offshore Construction Activities on Land Use, Development Patterns, and Infrastructure

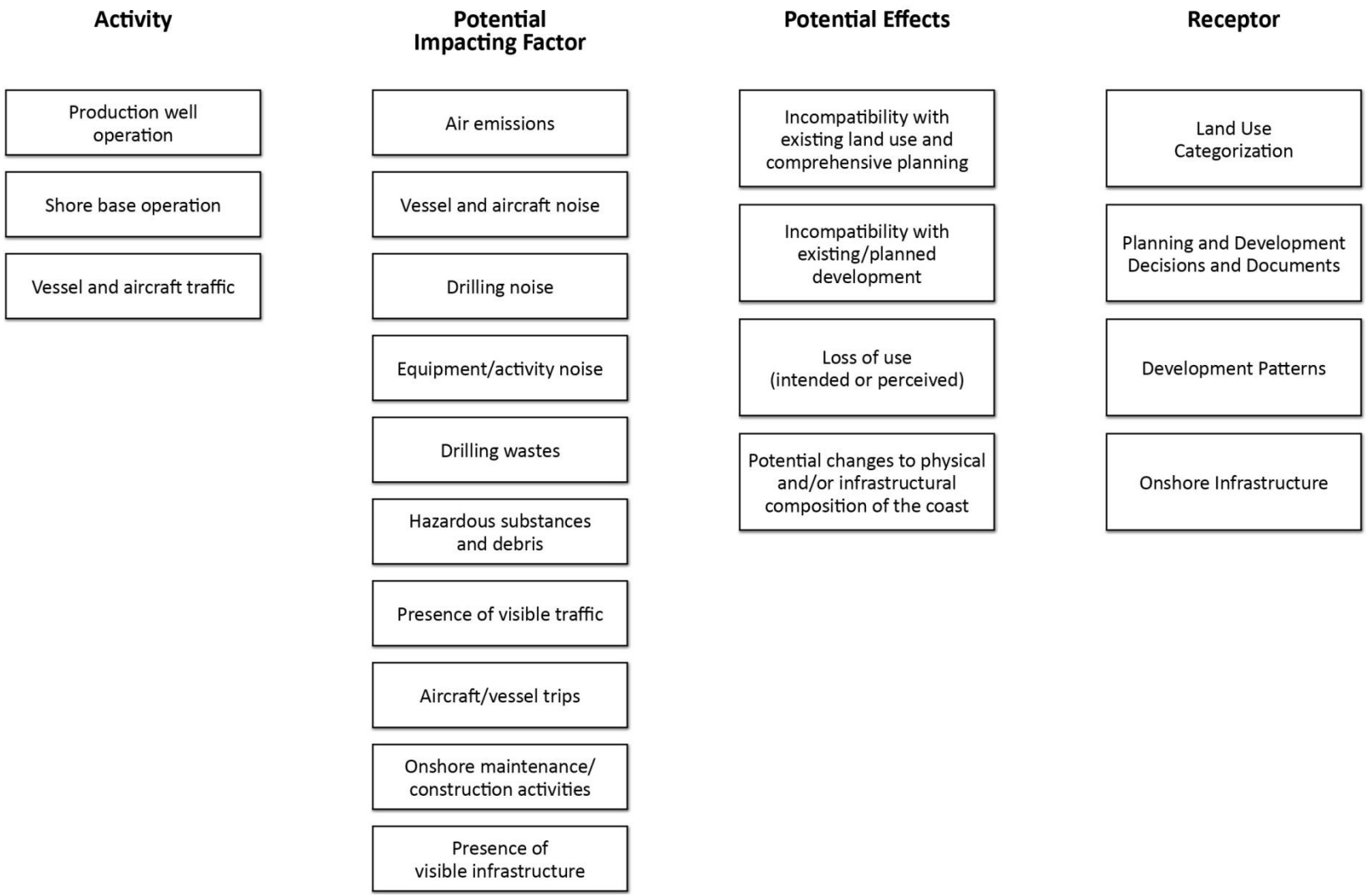

FIGURE 4.4.10-3 Conceptual Model for Potential Direct and Indirect Effects of Normal Operations on Land Use, Development Patterns, and Infrastructure

- Potential changes to the physical and/or infrastructural composition of the coast.

Each of these impacts is discussed in the context of seismic explorations, construction of onshore and offshore facilities, normal operations, and decommissioning. A more general discussion of impacts is provided for accidental releases or spills.

For the purpose of this discussion, land use refers to the activity that occurs on a specific area of land and within the structures that occupy it, whereas zoning regulations include such things as requirements for building size, bulk, and density. General land use is assumed to be the primary factor in determining existing and future development decisions. Specific zoning regulations were not evaluated for areas located within the GOM, the Cook Inlet, or the Arctic due to the large scale of the planning areas. Individual environmental assessments generally would account for localized regulations.

In addition, for the purposes of this discussion, intended land use is that prescribed by regulations or formalized land use plans. For instance, if a parcel of land is dedicated as agricultural land, the intended activities likely would include farming, animal husbandry, or a combination of rural activities. The actual use, however, may differ. For the purpose of this evaluation, "actual use" is the manner in which people physically use the land that may or may not be regulated or prescribed by laws or formal plans. Instead, the use may involve traditional practices or activities occurring for long periods of time.

4.4.10.1 Gulf of Mexico

As indicated in Table 4.4.1-1, potentially available oil includes a range of 2.7 to 5.4 billion barrels (Bbbl) within the GOM, along with 12–24 trillion cubic feet (tcf) of natural gas. In order to provide for production of these resources, a number of routine activities are necessary. As previously indicated, these activities have the potential to impact existing and future land use, development patterns, and infrastructure.

The following analysis provides a description of those impacts that would occur on land use within the Western and Central Planning Areas. No additional or new development is anticipated to occur within the Eastern Planning Area.

4.4.10.1.1 Routine Operations. Impacts from routine activities including exploration, development, production, and decommissioning are presented below.

Seismic Explorations and Exploratory Drilling. Activities associated with exploration typically include a seismic survey, exploratory well construction, and aircraft and vessel traffic (see Figure 4.4.10-1).

Local Land Use/Comprehensive Planning and Development Patterns. Seismic explorations and exploratory drilling would not impact land use, development patterns, and

infrastructure directly, as a majority of the activities would be located offshore. In general, existing and future land use categorizations would remain unchanged, along with current development patterns. Existing and planned activities associated with local planning initiatives and plans likely would not be hindered, as the jurisdiction of these plans typically would not extend to the offshore activities. State and Federal planning initiatives, such as the National Coastal Zone Management (CZM) Program, would generally be consistent with seismic surveys and exploratory drilling due to the need for prioritizing coastal-dependent uses (see Section 3.11.1 for more information on this program).

Loss of Use to Existing Landowners or Users. Seismic explorations and exploratory drilling activities would not impact access or use of a particular land area. Some safety-related temporary restrictions on access may be necessary both onshore and offshore; however, these restrictions likely would be temporary, lasting only as long as the exploration activities, with access restrictions lifted afterwards.

In addition, the use of individual properties may be affected indirectly if excessive noise and air emissions generated by survey equipment/vessels and onshore/offshore vehicular and air traffic (e.g., helicopters and automobiles) were to occur, or if a small increase in the amount of trash and debris washing ashore were to result from exploration. These occurrences may cause a temporary disturbance or annoyance among particular landholders or users and thereby interfere with their intended or actual use of the land. These impacts would be temporary in nature due to the short time frame of these activities. The level of impact would depend on the specific location of the exploration activities within the GOM, but generally would be anticipated to be minimal.

Physical and/or Infrastructural Composition. While additional infrastructure, such as machinery and staging area improvements, may be needed to accommodate equipment and workers associated with the exploration activities, the increase likely would be negligible at this stage of oil and gas development. In general, existing infrastructure within the GOM would likely be able to accommodate activities associated with exploration (see Section 3.11.1 for further information regarding existing GOM infrastructure).

Onshore and Offshore Construction. Impacts on land use, development patterns, and infrastructure associated with onshore and offshore construction are presented below. As indicated in Figure 4.4.10-2, activities associated with this phase include production well placement, pipeline placement, onshore construction, and aircraft and vessel traffic. Similar to the exploration phase, these activities have the potential to impact local land use and comprehensive planning and existing and planned development; access and use of particular properties; and the physical and infrastructural makeup of the GOM as pertaining to emissions, waste, noise, and traffic; each is discussed below.

Local Land Use/Comprehensive Planning and Development Patterns. As indicated in Section 3.11.1, a number of onshore and offshore facilities are associated with the development of offshore oil and gas. Among these are ports, ship and shipbuilding yards, support and transport, pipelines, pipe coating yards, natural gas processing and storage, refineries, petrochemical plants, and waste management facilities. Current BOEM data suggests that more

than 3,900 offshore production facilities are located within the GOM within Federal waters. Most of these facilities are located within the Western and Central Planning Areas.

According to previous government documents, a steady pace of offshore leasing has persisted in the GOM for nearly six decades with the first Federal lease sale in 1954 (MMS undated). Consequently, land use categorizations in the Western and Central Planning Areas often would be able to accommodate this type of industry. Therefore, negligible impacts on land use categorizations (i.e., receptor) are predicted by the continuation of leasing and subsequent exploration and development activities in the Western and Central GOM Planning Areas. In addition, the development of oil and gas facilities likely would be compatible with existing local land use, zoning, and comprehensive planning in these areas. Land use likely would evolve over time, with most changes occurring as a result of general regional growth rather than specific activities associated with the production of oil and gas (BOEMRE 2011).

As a result of the DWH event, the overall climate for development of oil and gas has been altered in response to a recent suspension and changes in Federal requirements for drilling safety in the whole of the GOM (BOEMRE 2011a). In some areas of the GOM, for instance, local planning initiatives have been drafted in response to the recent event that could impact the construction of new and/or infill facilities. Some of these initiatives focus on the economic diversification of the GOM coast, rather than upon oil and gas activities, while other strategies focus on the investment of monies for necessary human services (Restore the Gulf 2010b). In this manner, perceptions about the spill may influence future decisions regarding the need for oil and gas investments, improvements to existing infrastructure, and the construction of new oil and gas facilities.

Likewise, individual businesses and organizations have adapted to the altered, post-DWH environment. For instance, some companies have removed a portion of their equipment, and a substantial decrease in helicopter flights and servicing of rigs has occurred. Companies have trimmed budgets by cutting hours and salaries of workers; associated support services, such as chemical suppliers and welders, also have been affected by the DWH event.

The effects of this decreased demand have rippled through the various infrastructure categories (e.g., fabrication yards, shipyards, port facilities, pipecoating facilities, gas processing facilities, and waste management facilities) and have affected the oil and gas support sector businesses (e.g., drilling contractors, offshore support vessels, helicopter hubs, and mud/drilling fluid/lubricant suppliers) (BOEMRE 2011a). Land use has been impacted indirectly through various economic incentives, compliance with permitting requirements, and the lack of use of existing facilities. As indicated in a 2011 lease sale, some locations offered a 30% reduction in rental rates in order to keep businesses (BOEMRE 2011a). Actions of this nature influence the overall development pattern. As a consequence, BOEM anticipates monitoring the overall oil and gas development climate as it pertains to the DWH event (BOEMRE 2011a).

If new infrastructure is needed onshore, some developments may be subject to local, State, and/or other Federal permitting and regulations. Within the Western and Central Planning Areas, infill development likely would occur in areas already established for oil and gas

development. Specific timelines and requirements would vary by location, as the BOEM typically is not the permitting or regulating agency for development activities that occur onshore.

Loss of Use to Existing Landowners or Users. In addition to receiving proper permitting and approvals, onshore and offshore construction generally would not interfere with or prevent use by existing owners or users within areas of immediate development. During construction activities, a temporary loss of access to some areas may be required for safety reasons, with access restored upon completion of the activities. Some users of surrounding land may be inconvenienced by closure or restrictions on access routes, as well. Permanent loss of use is not anticipated. If new land were necessary in order to construct onshore facilities, the acquisition would follow all pertinent local, State, and Federal requirements.

In addition, the use of individual properties in the vicinity of the construction activities may be affected indirectly if excessive noise and air emissions generated by the construction equipment and onshore/offshore vehicular and air traffic (e.g., helicopters and automobiles) were to occur, or if a small increase in the amount of trash and debris washing ashore were to result from the activities. These occurrences may cause a temporary disturbance or annoyance among particular landholders or users, thereby inhibiting the intended or actual use of a property. The level of impact would depend on the specific location within the GOM, but generally would be anticipated to be minimal.

Physical and/or Infrastructural Composition. Physical land disturbance also would occur in locations where new facilities are needed. As indicated in Table 4.4.1-1, the Western and Central Planning Areas may require up to 12 new pipeline landfalls, four to six new pipe yards, and the potential for up to 12 new natural gas processing facilities. Approximately 3,862–12,070 km (2,400–7,500 mi) of new pipeline could be needed, as well.

The creation of pipeline landfalls could involve such activities as clearing land, preparing a ROW, and digging and backfilling trenches. These activities could alter the physical composition of the landscape, thus potentially limiting the intended use of a parcel unless located in existing utility ROWs. Likewise, the construction of new shore bases and waste facilities could involve, but would not be limited to, the preparation of a site through grading and clearing, excavations, and foundation building. As with a pipeline, these types of activities would alter the existing landscape and, depending on the scale and location, could alter the intended use of a parcel. While these changes would be necessary in some locations within the GOM, the activities associated with the oil and gas construction would not likely cause an extensive change to existing development patterns; as such, the impacts would be anticipated to be minimal.

The construction of more permanent facilities could be a positive impact or a negative impact depending on the specific location within the GOM. For instance, where new roads would provide additional routes and capacity for coastline travel, they may be perceived as a positive impact by some stakeholders. However, if the same roadways added large traffic volumes to existing roadways that already were over capacity, the construction could be seen as a negative impact.

Additional indirect impacts include those associated with climate change. Siting of new facilities may account for potential changes resulting from rises in sea level, increased storm frequency and intensity, and temperature changes. Figure 4.4.10-4 provides an illustration of the potential sea rise levels in the GOM. Potential solutions to account for these changes include facility relocation, the construction of seawalls and storm surge barriers, dune reinforcement, and land acquisitions to create buffer areas (IPCC 2007).

Consequently, indirect impacts on land use, development patterns, and infrastructure could include locating facilities further inland and/or strengthening the foundations or building materials of existing facilities. These actions potentially could increase costs associated with development or lead to the construction of new facilities rather than the reuse or expansion of existing properties associated with oil and gas production. These decisions may be influenced by the potential for increased flooding and/or erosion.

Routine Operations. Routine operation activities would consist of production well operation, onshore facility operation, and vessel and aircraft traffic, and would also include the transport of oil from offshore to onshore locations using ships or pipelines (see Figure 4.4.10-3). Potential impacts associated with these activities would range in extent from negligible to minimal.

Local Land Use/Comprehensive Planning and Development Patterns. Once in operation, negligible to minimal impacts are anticipated to result on land use, development patterns, and infrastructure, because a majority of the activities would be located offshore. As previously indicated, land use likely would evolve over time, with most changes occurring as a result of general regional growth rather than through activities associated with oil and gas production (BOEMRE 2011a). Some regions within the GOM may be impacted to a greater extent than others depending on the site-specific conditions.

Loss of Use to Existing Landowners or Users. Once the new offshore oil and gas facilities were in operation, temporary or permanent loss of use is not anticipated. As indicated in Section 3.11.1, many facilities already are located within the GOM to support oil and gas development. At times, some access to particular areas may be restricted within surrounding lands to accommodate a brief alteration in normal operations, such as an emergency response. These impacts would be limited and temporary.

Similar to construction, the use of individual properties in the vicinity of the operating platforms may be affected indirectly if excessive noise and air emissions were generated from equipment and onshore/offshore vehicular and air traffic (e.g., helicopters and automobiles), or if a small increase in the amount of trash and debris washing ashore were to result from the activities. These occurrences may cause disturbances or annoyance among particular landholders or users, thereby inhibiting the intended or actual use of a property. The level and extent of impact would depend on the specific location within the GOM, but generally would be anticipated to be minimal.

Physical and/or Infrastructural Composition. To the extent possible, existing facilities would be used to support activities under new leases, and new facilities would be built only

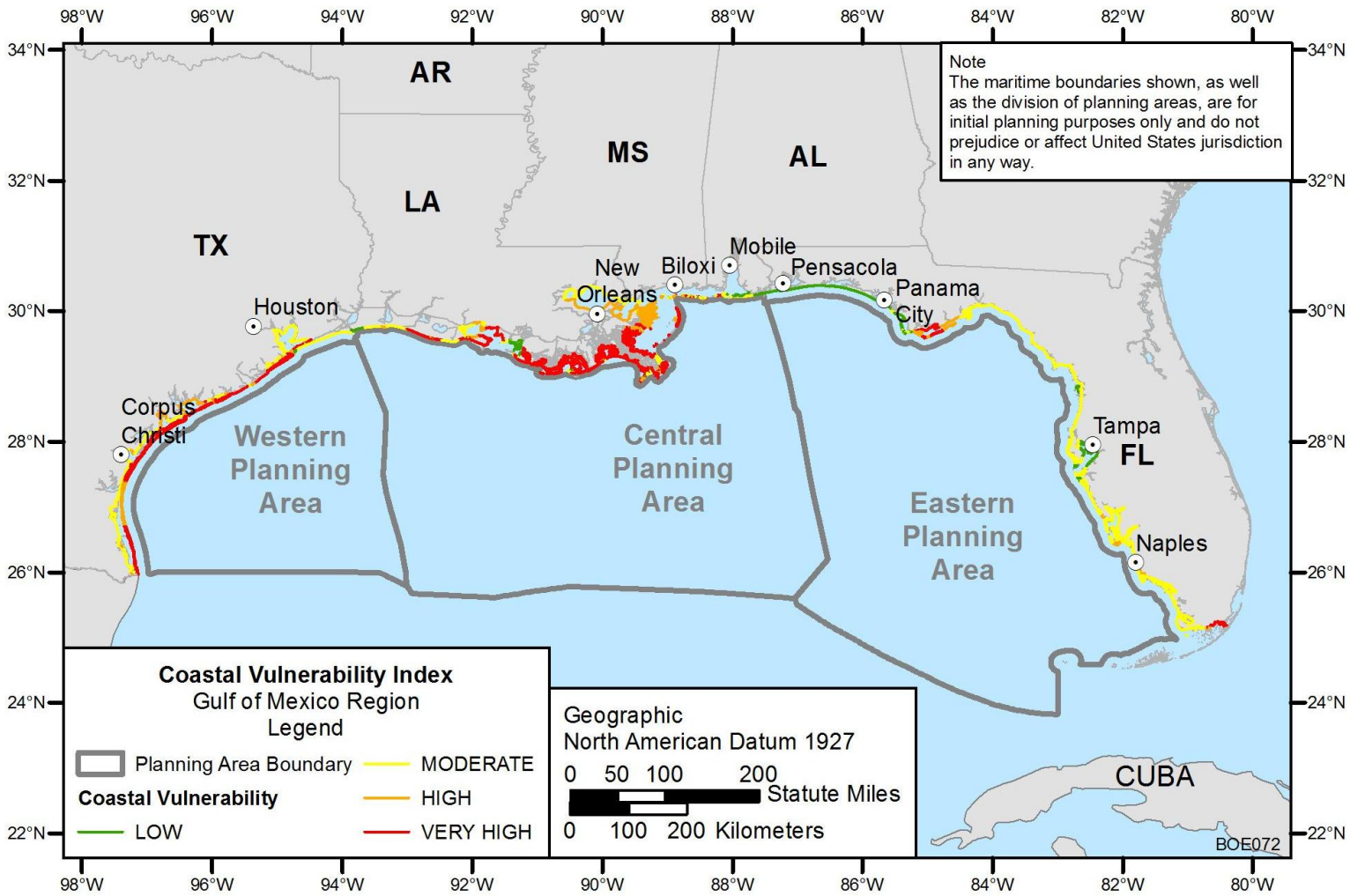

FIGURE 4.4.10-4 Coastal Vulnerability Index

where necessary, which would tend to limit the potential to create lasting changes to the physical and/or infrastructural makeup of the GOM during operations.

Decommissioning. Typical activities during the decommissioning/reclamation phase could include, but are not limited to, the closure of all wells, removal of access roads (not maintained or intended for other uses) and associated facility sites, and revegetation. These activities have the potential to directly impact land use, development patterns, and infrastructure.

Impacts associated with decommissioning, however, generally would be site-specific. In some cases, return to pre-exploration and preconstruction conditions may not be feasible.

Local Land Use/Comprehensive Planning and Development Patterns. Depending on the location of the production wells and associated infrastructure, decommissioning activities onshore may be regulated by local land use, zoning, and comprehensive planning initiatives or requirements. The continued use of the facilities after production could impact planned development in a positive manner, either by providing an opportunity for reuse of facilities or allowing for the potential for additional or future oil and gas development.

Loss of Use to Existing Landowners or Users. No permanent loss of use is anticipated to occur during the decommissioning/reclamation phase. Some temporary loss may occur if road or area closures are necessary to accommodate equipment, workers, or specific activities associated with this type of process. Access typically would be restored to its preconstruction or operations state.

In addition, the use of individual properties in the vicinity of the activities may be affected indirectly if excessive noise and air emissions generated by the decommissioning equipment, activities, and onshore/offshore vehicular and air traffic (e.g., helicopters and automobiles) were to occur, or if a small increase in the amount of trash and debris washing ashore were to result from the activities. These occurrences may cause a temporary disturbance or annoyance among particular landholders or users, thereby inhibiting the intended or actual use of a property. The level of impact would depend on the specific location within the GOM, but generally would be anticipated to be minimal.

Physical and/or Infrastructural Composition. In addition, potential changes to the physical and infrastructural makeup of the GOM coast could occur. Any equipment added may be removed; defunct equipment also could be removed. These alterations would be site-specific and the extent of their impact likely could range from negligible to minimal with regard to the existing composition of land use and infrastructure.

4.4.10.1.2 Accidents. Oil spills are the principal accidental impact-causing event. If oil spills were to occur and were to contact the coast, overall impacts on land use and existing infrastructure typically would be minor. Approximately 8 large spills, 35–70 medium-sized spills, and 200–400 small spills are anticipated to occur in the GOM as a result of new

development (see Table 4.4.2-1).[14] Oil spilled in offshore areas usually is localized and has a low probability of contacting coastal areas, because much of the oil volatilizes or is dispersed by currents (MMS 2008a). In most cases, coastal or nearshore spills would have short-term adverse effects on coastal infrastructure requiring cleanup of any oil or chemicals spilled (MMS 2006a).

Potential impacts on land use and existing infrastructure would likely include "stresses of the spill response on existing infrastructure, direct land-use impact (such as impacts of oil contamination to a recreational area or to agricultural land), and restrictions of access to a particular area, while the cleanup is being conducted" (MMS 2007c). These impacts generally would be temporary and localized. However, as shown by recent events in the GOM (i.e., the Deepwater Horizon event), the degree of impact is influenced by many factors including, but not limited to, spill location, spill size, type of material spilled, prevailing wind and current conditions, the vulnerability and sensitivity of the land use and infrastructure, and response capability.

Catastrophic Discharge Event. In addition to small and large releases, the PEIS analyzes the impacts of a CDE of 0.9 to 7.2 million bbl in size (Table 4.4.2-2). While no direct major land use impacts would be expected following a CDE, post-spill habitat restoration efforts could result in enhanced barrier islands and wetlands. A number of indirect effects may result, including adaptations in commercial industries, such as fishing and tourism, fluctuating economic patterns, and changes in demographic distributions; all of these impacts could affect land use or development patterns by altering spending patterns of consumers and developers. Following the DWH event, perceptions regarding emergency planning have created a need for future planning and accounting for potential events of greater magnitude than typically anticipated. Trickle-down effects of the DWH event may include more stringent safety protocols in the operation and construction of infrastructure, which may include onshore facilities as well as offshore facilities. Similar types of effects would be anticipated if a catastrophic discharge event were to occur during the life of the Program.

4.4.10.2 Alaska – Cook Inlet

New oil and gas production is anticipated in the Cook Inlet, an area previously used for offshore production. As indicated in Table 4.4.1-3, oil production is anticipated to include a range of 0.1 to 0.2 Bbbl within south central Alaska; currently no active Federal leases are located within the Inlet. However, 16 active offshore producing platforms are located within the Cook Inlet in State submerged land. These platforms are served by more than 320 km (200 mi) of undersea gas and oil pipelines, as well as onshore facilities (see Section 3.11.2).

A number of routine activities would be necessary to provide for additional production; these activities have the potential to impact existing and future land use, development patterns, and infrastructure. This analysis of impacts, therefore, focuses solely on new production within the Cook Inlet.

[14] As indicated in Section 4.4.2.1, large spills are categorized as those that result in over 1,000 barrels of oil being released; medium-sized are those between 50 and 1,000 barrels, and small spills are those under 50 barrels.

4.4.10.2.1 Routine Operations.

Seismic Explorations and Exploratory Drilling. As previously noted, activities associated with exploration typically include a seismic survey, exploratory well construction, and aircraft and vessel traffic (Figure 4.4.10-1). The impacts resulting from these activities are discussed below.

Local Land Use/Comprehensive Planning and Development Patterns. Seismic explorations and exploratory drilling would not directly impact land use, development patterns, and infrastructure within the Cook Inlet, because a majority of the activities would be located offshore. During this phase, existing and future land use categorizations would remain largely unchanged, along with current development patterns.

In general, activities to support exploration would be located onshore within existing developments in order to act as staging areas for the seismic surveys and exploratory wells. Temporary onshore service bases could be needed to support offshore exploratory drilling operations. These bases would transfer materials between land and the offshore drilling rigs. In addition, supply vessels and helicopters would be used to shuttle personnel, equipment, and supplies. Existing facilities generally would be used within the Cook Inlet, if they were available in the selected location for exploration; if necessary, new facilities would be built, or prefabricated modules could be moved to the base of the exploration activities (Kenai Peninsula Borough 2008).

Loss of Use to Existing Landowners or Users. Activities associated with seismic explorations and exploratory drilling could impact access or use of a particular land area, although to a minimal extent. Some temporary onshore and offshore access restrictions could be necessary for safety reasons; however, these restrictions likely would be temporary, lasting only as long as the exploration activities.

The perception of loss of land or use, however, might increase among tribal communities,[15] local inhabitants, and visitors within the Cook Inlet. As offshore exploration includes the temporary siting of large drilling rigs and discharges of drilling muds and cuttings, some people using the coastal area for subsistence hunting and gathering or for recreation and tourism might perceive the effects of the drilling as a disruption to their regular activities (see Sections 4.4.13 and 4.4.14 for a further discussion of subsistence activities, Section 4.4.12 for a discussion of recreation and tourism, and Section 4.4.3.2 for a discussion of water quality). If the perceived disruption or "nuisance" becomes too intense, users may relocate to other parts of the Inlet in order to conduct their regular activities in anticipation of the new oil and gas activities. Thus, the actual use of the land may be impacted, even if the intended land use designation or categorization is not altered. Within the Cook Inlet, this impact would be anticipated to be minimal, due to the presence of the existing oil and gas industry.

[15] Approximately 8.9% of all land within the Kenai Peninsula Borough is owned by Native Village and Regional Corporations. Large tracts of this type of land surround Nanwalek, Port Graham, Tyonek, Ninilchik, Seldovia, and Kenai. Some of the parcels have been used for logging, oil and gas extraction, and mining (Kenai Peninsula Borough 2005).

In addition, the use of individual properties in the vicinity of the exploration activities may be affected indirectly if excessive noise and air emissions generated by the exploratory equipment, activities, and onshore/offshore vehicular and air traffic (e.g., helicopters and automobiles) were to occur, or if a small increase in the amount of trash and debris washing ashore were to result from the activities. These occurrences may cause a temporary disturbance or annoyance among particular landholders or users, thereby inhibiting the intended or actual use of a property. The level of impact would depend on the specific location within the Cook Inlet, but generally would be anticipated to be minimal.

Physical and/or Infrastructural Composition. As noted in Table 4.4.1.2-1, approximately 4–12 exploration wells would be drilled within south central Alaska. Due to the existing oil and gas infrastructure already present, a minimal amount of additional machinery and staging area improvements would be needed in order to accommodate equipment and workers associated with exploration activities.

Onshore and Offshore Construction. Onshore and offshore construction could impact local land use and comprehensive planning and existing and planned development; access and use of particular properties; the physical and infrastructural composition of the Cook Inlet; and existing conditions as they pertain to emissions, waste, noise, and traffic (see Figure 4.4.10-2).

As indicated in Section 4.1.1-2, construction activities often include production well placement, pipeline placement, onshore construction, and aircraft and vessel traffic. Per the proposed development scenario within south central Alaska, construction of approximately one to three new platforms is anticipated, along with 40–241 km (25–150 mi) of new offshore pipeline and 80–169 km (50–105 mi) of onshore pipeline. Up to one new pipeline landfall also may be needed, as indicated in Table 4.4.1.1-3. Potential impacts of these activities are presented below.

Local Land Use/Comprehensive Planning and Development Patterns. Due to a long history of oil and gas development, existing land use categorizations in Cook Inlet often would be able to accommodate new leases for the proposed development scenario. As indicated in Section 4.4.1.2, existing infrastructure would be used to the extent possible, limiting the need for the acquisition of new sites for development. Therefore, negligible to minor impacts on land use categorizations (i.e., receptors) are predicted by the addition of new leases and subsequent construction activities.

Loss of Use to Existing Landowners or Users. Onshore and offshore construction generally would not interfere with or prevent use by existing owners or users within areas already used for oil and gas. As previously indicated, the use of existing facilities generally would be preferred over new construction. However, during construction activities, a temporary loss of access for some users may occur, even within an existing oil and gas development area. Restrictions on access may be put in place for safety reasons or to allow certain activities to occur. Depending on the location of the activities, the restrictions would be lifted after the completion of construction.

Likewise, some users of surrounding land may be inconvenienced by closure or restrictions on access routes or within areas used for subsistence activities. For example, within the Cook Inlet, as in other parts of Alaska, air carriers generally provide a large share of the cargo and passenger service to and within the State. Water transport, especially for large and heavy materials, also is an important component of the transportation network. Activities related to the construction may impact Alaska's air routes, air-terminal facilities, and barge-cargo services, causing delays or changes in scheduling or service (MMS 2002a). Consequently, the perceived impact associated with these restrictions or closures to access routes or land areas may weigh more heavily on permanent communities using surrounding lands or routes for subsistence activities or for daily employment than on temporary visitors or tourists.

While plans for oil and gas development generally would limit the amount of permanent loss of use, especially during construction, some users may be subject to this type of impact dependent on the specific location chosen. A permanent loss of use generally would be associated with land parcels in which land use categorizations were amended to allow for oil and gas construction activities. If new land were necessary in order to construct onshore facilities, such as a new pipeline or landfall, the acquisition process would need to follow all pertinent local, State, and Federal requirements.

In addition, the use of individual properties in the vicinity of the construction activities may be affected indirectly if excessive noise and air emissions generated by the construction equipment and onshore/offshore vehicular and air traffic (e.g., helicopters and automobiles) were to occur, or if a small increase in the amount of trash and debris washing ashore were to result from the activities. These occurrences may cause a temporary disturbance or annoyance among particular landholders or users, thereby inhibiting the intended or actual use of a property. The level of impact would depend on the specific location within the Cook Inlet, but generally would be anticipated to be minimal.

Physical and/or Infrastructural Composition. The physical and infrastructural composition of south central Alaska would be altered by the expansion and/or improvement of existing facilities, as well as by new construction. The extent of the impacts associated with these activities ultimately would depend on their specific location within the Cook Inlet. For example, this region has an inland network of oil and gas gathering distribution pipelines; one such community is Nikiski, which has existing oil and gas support facilities to account for current leasing (MMS 2007a). The basic onshore support and processing infrastructure that would be necessary to support the anticipated levels of activity are already in place within the Cook Inlet; these transport, loading, and storage capabilities would require expansion to handle an increased volume of produced crude oil rather than extensive construction of new facilities (MMS 2002a, 2007a).

While the oil and gas industry within Cook Inlet was one of the largest sources of high paying jobs within the last decade, natural gas production recently has provided a more stable source of employment. As a result, some of the aging infrastructure associated with offshore drilling is in poor repair, and thus would require updates, expansion, and/or other improvements (Fried and Windisch-Cole 2004). In these locations, new construction could be a more appropriate solution to accommodate offshore oil and gas production.

If new infrastructure were needed, it would be built either as infill within an existing industrial or port area or within an area recently designated for this type of development. A greater impact on the existing physical landscape would be experienced in those areas not already used for oil and gas production. For instance, the construction of the pipeline landfall could involve clearing land, preparing a ROW, and digging and backfilling trenches. Additional clearance could be necessary in order to accommodate the new on shore pipeline, as well. These types of activities or similar ones could alter the physical composition of the landscape, thus potentially limiting the intended, actual, or future use of a parcel. If needed, this type of construction would have extensive impacts in lands used for subsistence hunting or other similar activities.

Additional indirect impacts concern those associated with climate change. New facilities may be sited in different locations in response to anticipated rises in sea level, increased storm frequency and intensity, and temperature changes. Other activities that might be undertaken in response to real or potential climate change–induced rises in sea level include facility relocation, the construction of seawalls and storm surge barriers, and land acquisitions to create buffer areas (IPCC 2007).

Consequently, indirect impacts on land use, development patterns, and infrastructure could include locating further inland and/or strengthening foundations or building materials of existing facilities. These actions potentially could increase costs associated with development or force the construction of new facilities rather than the reuse or expansion of existing properties associated with oil and gas production. These decisions may be influenced by the potential for increased flooding and/or erosion, as well.

Routine Operations. Routine operations would include production well operation, onshore facility operation, and vessel and aircraft traffic, as well as the transport of oil from offshore to onshore locations using pipelines. Potential impacts associated with these activities would range in extent from negligible to minimal (see Figure 4.4.10-3).

Local Land Use/Comprehensive Planning and Development Patterns. Once offshore oil and gas facilities were in operation,[16] negligible to minimal impacts on land use, development patterns, and infrastructure would be expected, because a majority of the activities would be located offshore, with some activity occurring within onshore bases and transportation facilities.

In addition, as shown in Table 4.4.1-3, no new shore bases, processing facilities, or waste disposal facilities are associated with the proposed action. Since existing infrastructure would be used to the extent possible, the anticipated use of onshore facilities during normal operations would not be expected to generate noticeable changes to the current setting that would impact the overall land use, development patterns, or infrastructure of Cook Inlet.

[16] For the purposes of this evaluation, normal operations exclude events leading up to the production of offshore oil and gas.

Loss of Use to Existing Landowners or Users. Once offshore oil and gas facilities were in operation, a temporary or permanent loss of use would not be anticipated, because a sufficient number of facilities already are located within Cook Inlet to support the increased oil and gas development. At times, some access may be restricted within surrounding lands to accommodate a brief alteration in normal operations (e.g., an emergency response).

Furthermore, the use of individual properties in the vicinity of the operating platforms may be affected indirectly if excessive noise and air emissions were generated from equipment and onshore/offshore vehicular and air traffic (e.g., helicopters and automobiles), or if a small increase in the amount of trash and debris washing ashore were to result from the activities. These occurrences may cause disturbances or annoyance among particular landholders or users, thereby inhibiting the intended or actual use of a property. The level and extent of impact would depend on the specific location within the Cook Inlet, but generally would be anticipated to be minimal.

Physical and/or Infrastructural Composition. To the extent possible, existing facilities would be used and new facilities would be built only where necessary, once initial construction was completed. Since the anticipated new development is modest, large impacts on the physical and/or infrastructural composition of Cook Inlet during the operation phase would not be expected.

Decommissioning. When activities for oil and gas become uneconomical to continue production operations or when a lease expires, many of the structures built for production would be dismantled, shut down, or converted to other uses. Typical government regulations require that offshore structures be cut off below the mud line and entirely removed, while pipelines often are left in place due to the high cost of removal. Offshore wells would be cemented in, and sea bottom well sites would be dragged to remove obstructions (Kenai Peninsula Borough 2008). Due to the physical nature of these activities, land use, development patterns, and infrastructure might be impacted directly. These impacts generally would be site-specific. In some cases, a return to pre-exploration and preconstruction conditions might not be feasible.

Local Land Use/Comprehensive Planning and Development Patterns. Depending on the location of the production wells and associated infrastructure, decommissioning activities onshore might be regulated by local land use, zoning, and comprehensive planning initiatives or requirements. In turn, local planning initiatives often account for developments of this nature in future planning. For instance, the continued use of the facilities after production could impact planned development in a positive manner, either by providing an opportunity for reuse of facilities or allowing for additional or future oil and gas activities (MMS 2007b).

Loss of Use to Existing Landowners or Users. No permanent loss of use is anticipated to occur during the decommissioning/reclamation phase. Some temporary loss might occur if road or area closures were necessary to accommodate equipment, workers, or specific deconstruction activities. If feasible, access would be restored to its preconstruction or operations state.

During decommissioning, the use of individual properties in the vicinity of the activities may be affected indirectly if excessive noise and air emissions were generated from equipment and onshore/offshore vehicular and air traffic (e.g., helicopters and automobiles), or if a small increase in the amount of trash and debris washing ashore were to result from the activities. These occurrences may cause temporary disturbances or annoyance among particular landholders or users, thereby inhibiting the intended or actual use of a property. The level and extent of impact would depend on the specific location, but generally would be anticipated to be minimal.

Physical and/or Infrastructural Composition. In addition, potential changes to the physical and infrastructural makeup of Cook Inlet could occur. Any equipment added may be removed; other defunct equipment also could be removed. Impacts on land use and infrastructure would be site-specific and could range from negligible to minor. Moreover, if any offshore or onshore infrastructure were deemed a visual intrusion within the landscape for the duration of the project, removal of the structure during decommissioning would remove the feature, and thus help to alleviate the impact (MMS 2003a).

4.4.10.2.2 Accidents. The risk of a spill is present whenever crude oil or petroleum products are handled. Oil spills could be associated with the exploration, development, production, storage, and/or transportation processes and might occur from losses of well control or pipeline or tanker accidents. As indicated in Table 4.4.2-1, approximately 1 large spill, 1 to 3 medium-sized spills, and 7 to 15 small spills are anticipated to occur as part of new development within Cook Inlet. From 1999 to 2008, 18 crude oil spills of 380 L (100 gal) or more from pipelines, platforms, onshore production facilities, storage facilities, and marine tankers have occurred in Cook Inlet. Six of these were more than 1,900 L (500 gal) (ADNR 2009b).

Based upon knowledge acquired from previous spills, potential impacts to land use and infrastructure resulting from an oil spill would likely include moderate temporary stresses of the spill response on existing community infrastructure, increased boat and air traffic to respond to the spill and cleanup operations, and restrictions of access to a particular area while the cleanup is conducted (MMS 2007c). These stresses could lead to a temporary loss of use of certain parcels both for their intended and actual uses, but generally no permanent land use categorization changes.

Within Cook Inlet, a geographic response strategy (GRS) has been formulated to account for 17 sites within the central Cook Inlet, 18 sites for the southwest, 21 sites for Kachemak Bay, and 22 sites for the southeast. Strategies within this plan focus on minimizing the environmental damage, using a small response footprint, and selecting sites for equipment deployment that would not cause further harm (ADNR 2009b).

Catastrophic Discharge Event. The PEIS analyzes the impacts of a CDE that could range in size from 75 to 125 thousand bbl (see Table 4.4.2-2). These events have the potential to impact future development patterns if irreversible changes to the land composition occur within certain areas. For example, one of the largest events of this type occurred in 1989; it consisted of

the *Exxon Valdez* discharge. This event led to the closure or disruption of many Cook Inlet businesses, including fisheries (ADNR 2009b).

However, only one spill of this size is anticipated to occur within this region (see Table 4.4.2-2). It would likely be a result of oil transport from a tanker carrying Arctic and Cook Inlet OCS oil from the Valdez terminal to U.S. ports (see Section 4.4.2.1 for additional information). In most cases, a worst-case oil discharge from an exploration facility, production facility, pipeline, or storage facility would be restricted by the maximum tank or vessel storage capacity or by a well's ability to produce oil.

Potential impacts to land use and infrastructure resulting from a CDE would likely include moderate to high temporary stresses of the spill response on existing community infrastructure, increased boat and air traffic to respond to the spill and cleanup operations, and restrictions of access to a particular area while the cleanup is conducted (MMS 2007c). Some of these impacts may lead to more permanent changes in the way land is used, such as closure or disruptions of business as occurred for the *Exxon Valdez* event (ADNR 2009b).

4.4.10.3 Alaska – Arctic

Oil and gas production within the Arctic as a whole is not as developed as that in the GOM and Cook Inlet; however, this region includes the Beaufort Sea Planning Area, which has well-developed oil and gas industry infrastructure on adjacent land and in State waters. For instance, the Prudhoe Bay complex is located within the Beaufort Sea Planning Area. This is part of a large oil producing field, which contains extensive infrastructure (MMS 2007c).

As indicated in Table 4.4.1-4, oil production is anticipated to include 0.2 to 2.1 Bbbl within the Beaufort Sea and the Chukchi Sea. Therefore, a number of routine activities would be necessary to more fully develop this industry in order to provide for additional production within the Beaufort and Chukchi Seas region. As noted for the other areas, these activities have the potential to impact existing and future land use, development patterns, and infrastructure.

4.4.10.3.1 Routine Operations. Routine activities include exploration, development, production, and decommissioning. Impacts on land use, development patterns, and infrastructure within the Beaufort and Chukchi Seas regions from each of these activities are presented below.

Seismic Explorations and Exploratory Drilling. Activities associated with exploration typically include a seismic survey, exploratory well construction, and aircraft and vessel traffic.

Local Land Use/Comprehensive Planning and Development Patterns. Seismic explorations and exploratory drilling would not directly impact land use, development patterns, and infrastructure, because a majority of the activities would be located offshore. During this phase, existing and future land use categorizations would remain largely unchanged.

Loss of Use to Existing Landowners or Users. Activities associated with seismic explorations and exploratory drilling could potentially impact access or use of a particular land area, although to a minimal extent. Some temporary safety-related restrictions on access might be necessary both onshore and offshore; however, these restrictions likely would last only as long as the exploration activities.

For this area of Alaska, a scattered exploration pattern may be necessary due to the lack of existing oil and gas infrastructure. For this type of exploration pattern, more frequent and longer-duration helicopter and support boat trips would be needed than if a clustered pattern of exploration were utilized. For instance, platforms located beyond the landfast ice zone would require substantial helicopter support, especially during the developmental drilling phase, because they would be unreachable by ice roads. In addition, platforms located in the landfast ice zone could be served by vehicles traveling over ice roads (MMS 2007c). Local access to these transportation modes could be impacted, although to a minimal extent, to account for the additional trips and traffic associated with this type of exploration. This would result in a perceived loss of use for some people either living, visiting, or working within the area.

Perceived loss of land or use might also increase among tribal communities, local inhabitants, and visitors within the coastal areas of the Beaufort and Chukchi Seas. Since offshore exploration includes the placement of wells and the production of drilling muds and cuttings, which may be discharged into the marine environment, some people using the coastal area may perceive the effects of the drilling as a disruption to their regular activities. If the perceived disruption or "nuisance" becomes too intense, users may relocate to other parts of the coast in order to conduct their regular activities. Thus, the actual use of the land may be impacted, even if the intended land use designation or categorization is not altered.

For example, as indicated in Section 4.4.13.3, residents of the Chukchi Sea communities have noted a concern over the loss of a subsistence lifestyle and the imposition of additional demands on communities to maintain new infrastructure either directly or indirectly related to oil and gas exploration and eventual production. "Residents of the Chukchi Sea coastal communities have been remarkably consistent in their primary concerns during the more than 20 years of public hearings and meetings on State and Federal oil development on the North Slope" (BOEMRE 2010a, 2011k). Sections 4.4.13.3.1 and 4.4.14.3.1 provide additional information on the impacts to subsistence and tribal communities within the Arctic region resulting from oil and gas activities.

In addition, the use of individual properties in the vicinity of the exploration activities may be affected indirectly if excessive noise and air emissions were generated from equipment and onshore/offshore vehicular and air traffic (e.g., helicopters and automobiles), or if a small increase in the amount of trash and debris washing ashore were to result from the activities. These occurrences may cause disturbances or annoyance among particular landholders or users, thereby inhibiting the intended or actual use of a property. The level and extent of the indirect impacts would depend on the specific location within the Arctic region, but generally would be anticipated to be minimal to moderate (BOEMRE 2011k).

Physical and/or Infrastructural Composition. As noted in Table 4.4.1-4, approximately 6–20 exploration and delineation wells and 40–280 development and production wells would be drilled within the Arctic. Machinery and staging area improvements would be needed in order to accommodate equipment and workers associated with these exploration activities. The increase in physical infrastructure likely would be negligible to minimal at this stage of oil and gas development due to the temporary nature of the exploration activities and the anticipated use of existing facilities, where available.

Onshore and Offshore Construction. Similar to the exploration phase, onshore and offshore construction have the potential to impact local land use and comprehensive planning and existing and planned development; access and use of particular properties; and the physical and infrastructural composition of the Beaufort and Chukchi Seas.

As indicated in Figure 4.4.10-2, activities associated with this phase often include production well placement, pipeline placement, onshore construction, and aircraft and vessel traffic. Per the proposed development scenario within the Arctic region, approximately 1–5 platforms are anticipated, along with 16–130 km (10–80 mi) of onshore pipeline. No new pipeline landfalls or shore bases are anticipated. This section provides a discussion of impacts associated with land use as they pertain to onshore and offshore construction.

Local Land Use/Comprehensive Planning and Development Patterns. Due to the minimal level of current oil and gas development within the whole of the Beaufort and Chukchi Seas, existing land use plans and designations may not provide for areas that are able to accommodate new leases. Therefore, minimal to moderate impacts to land use and comprehensive planning decisions, such as a conditional use permit or zoning change, are predicted as a result of the leasing and subsequent development activities, including construction. The need to address existing land use would depend on the specific location selected for onshore construction and on the activity to be conducted (e.g., the construction of onshore pipeline routes or new transportation routes).

For instance, according to the North Slope Borough (NSB) comprehensive plan, five major zoning districts are present, including the Village, Barrow, Conservation, Resource Development, and Transportation Corridor (MMS 2007a). "All areas within the NSB are in the Conservation District, unless they are specifically designated within the limited boundaries of a village or Barrow, a unitized oil field within the Resource Development District, or within the Trans-Alaska Pipeline System (TAPS) corridor" (MMS 2007a). As indicated by this statement, major land uses generally are divided between subsistence use and petroleum-resource extraction (MMS 2007a).

Due to the recognition of oil and gas activities, all of the NSB land management regulations address oil and gas leasing activities, including onshore and offshore (MMS 2007a). Therefore, within the NSB, conditional use permits may be requested that would allow for specific, temporary activities; in some cases, the more permanent development associated with production would require that a master plan be prepared describing anticipated activities. In addition, use of non-Federal land within the NSB may require rezoning from the Conservation District to the Resource Development District or Transportation Corridor (MMS 2007a).

While not a direct cause and effect relationship, if changes to overall land use categorizations or planning initiatives were needed to begin construction and subsequent development of oil and gas facilities, future development patterns could be impacted. If onshore construction were to occur within the Arctic region, various government agencies and jurisdictions would be involved in the change. Land ownership within the North Slope area consists of overlapping ownership interests, at times vague boundary descriptions, and informal or unrecorded land transfers. Surface and subsurface ownership interests are held by the Federal Government, State government, the borough, villages, regional and village Native corporations, and private individuals, including Native allotments. As in many areas, surface and subsurface owners may differ, particularly in communities and Native allotments (URS Corporation 2005).

In addition, if new infrastructure would be needed onshore, some facilities and infrastructure would be subject to other local, State, and/or other Federal permitting and regulations, including provisions for the siting of facilities. Specific timelines and requirements would vary by location, as BOEM typically is not the permitting or regulating agency for development activities that occur onshore.

Loss of Use to Existing Landowners or Users. Onshore and offshore construction generally has the potential to interfere with or prevent use by existing owners or users within areas not already used for oil and gas activities (see Section 4.4.13.3 and 4.4.14.3 regarding impacts on subsistence activities). While the use of existing facilities generally is preferred over new construction, few of these facilities exist within the whole of the Arctic region as compared to the GOM and Cook Inlet. As previously indicated, the Chukchi Sea Planning Area has relatively little established infrastructure, while well-developed oil and gas facilities are located within the Beaufort Sea Planning Area, such as at the Prudhoe Bay complex. Therefore, during construction, a temporary loss of access to some users may occur. Restrictions on access may be put in place as safety precautions or to allow certain activities to occur. Depending on the location of the activities, these restrictions could be lifted after construction was completed.

Users of surrounding lands also may be inconvenienced by closure or restrictions on access routes or within areas used for subsistence activities during construction. For instance, if platforms were constructed in part onshore, some marine subsistence hunters may have to avoid or navigate around them when preparing their crafts from an onshore location. Another example would include the construction of temporary roads for exploration drilling or permanent roads that may be constructed as a result of proposed activities. While roads could increase access to previously inaccessible areas, they also could also create community-development, land use-planning, or fish and game-management problems (ADNR 2009). Consequently, the perceived impact associated with these restrictions or closures may weigh more heavily on communities using surrounding lands for subsistence activities than recreational users or tourists (see Sections 4.4.13.3.1 and 4.4.14.3.1 for additional information regarding subsistence activities).

In addition, the use of individual properties in the vicinity of the construction activities may be affected indirectly if excessive noise and air emissions were generated from equipment and onshore/offshore vehicular and air traffic (e.g., helicopters and automobiles), or if a small increase in the amount of trash and debris washing ashore were to result from the activities.

These occurrences may cause disturbances or annoyance among particular landholders or users, thereby inhibiting the intended or actual use of a property. The level and extent of impact would depend on the specific location within the Arctic, but generally would be anticipated to be minimal to moderate.

Physical and/or Infrastructural Composition. The physical presence of the shore-based and pipeline infrastructure within the Arctic region would represent an initial industrialization of the area and a long-term and significant change in land use patterns. This would result due to the change from an isolated and often pristine environment to one that supports oil and gas infrastructure. While new technologies and practices tend to be less damaging than those associated with past activities, the addition of these facilities has the potential to permanently alter the land use within the region (AMAP 2010).

In areas already developed with oil and gas infrastructure, such as in the Beaufort Sea Planning Area, the construction of oil and gas infrastructure would represent a continuation of industrial/commercial activity; however, in areas lacking existing infrastructure, it would account for a more substantial change in the industrial/commercial activity and diversity of individual villages (MMS 2007a). The extent of the impacts associated with these activities ultimately would depend on the specific location within the Arctic and the particular community in which facilities would be placed.

Impacts on infrastructural composition also would result from the development of onshore pipeline and a permanent road network in locations that do not already have existing oil and gas facilities. Depending on the location of a pipeline landfall, the path of an associated road to the Trans-Alaska Pipeline System (TAPS) might open up areas not previously reached by permanent roads. The positive benefits of this construction would be to aid future ice road and permanent road construction, as well as providing a connection to the North Slope communities (MMS 2007c). Some of the negative impacts of roadway construction would be the interference with subsistence uses and animal movement and the potential for increased traffic (see Sections 4.4.13.3.1 and 4.4.14.3.1 for more information).

Additional indirect impacts concern those associated with climate change. Siting of new facilities may account for potential changes resulting from rises in sea level, increased storm frequency and intensity, and temperature changes. One of the more noticeable effects would be the thawing of permafrost on land. In the Arctic, facilities often use permafrost as a solid foundation for buildings, pipelines, and roads, and for containing waste materials. Warming may degrade permafrost, which can harm existing facilities and prevent the use of permafrost in the future (AMAP 2007; MMS 2007c).

Consequently, indirect impacts on land use, development patterns, and infrastructure can include locating further inland and/or strengthening foundations or building materials of existing facilities. These actions potentially can increase costs associated with development or force the construction of new facilities rather than the reuse or expansion of existing properties associated with oil and gas production. These decisions also may be influenced by the potential for increased flooding and/or erosion.

Routine Operations. Routine operation activities would consist of production well operation, onshore facility operation, and vessel and aircraft traffic. It also would include the transport of oil from offshore to onshore locations using ships or pipelines (see Figure 4.4.10-3). As indicated in Section 4.4.1.3, the PEIS assumes that the most likely locations for the occurrence of activities would be in areas that already have been leased in recent sales. One to 15 helicopter trips and 1 to 15 vessel trips would be anticipated. Potential impacts associated with these activities would range in extent from negligible to moderate.

Local Land Use/Comprehensive Planning and Development Patterns. Once in operation,[17] negligible to minimal impacts are anticipated to result on land use, development patterns, and infrastructure, since a majority of the activities would be located offshore, and no additional construction would be anticipated. In general, the production of oil and gas would need to be consistent with Federal, State, and local planning initiatives.

Loss of Use to Existing Landowners or Users. Once in operation, an additional loss of use is not anticipated. At times, some access may be restricted within surrounding lands to accommodate a brief alteration in operations or a peak in normal activities, or to conduct maintenance.

During operation, the use of individual properties in the vicinity of the operating platforms may be affected indirectly if excessive noise and air emissions were generated from equipment and onshore/offshore vehicular and air traffic (e.g., helicopters and automobiles), or if a small increase in the amount of trash and debris washing ashore were to result from the activities. These occurrences may cause disturbances or annoyance among particular landholders or users, thereby inhibiting the intended or actual use of a property. The level and extent of impact would depend on the specific location within the Arctic, but generally would be anticipated to be minimal to moderate. For instance, in locations where subsistence activities occur, the impacts may be more noticeable and have a larger impact on certain communities as compared to other areas of the Arctic; a discussion of these impacts is provided in Sections 4.4.13.3.1 and 4.4.14.3.1.

Physical and/or Infrastructural Composition. To the extent possible, no new facilities would be built during normal operations. Therefore, the potential to create lasting changes to the physical and/or infrastructural composition of the Arctic region during the operation phase would be limited.

Decommissioning. When activities for oil and gas production operations become uneconomical to continue, or when a lease is expired, many of the structures built for production are dismantled, shut down, or converted to other uses. Decommissioning activities in the Arctic typically involve permanently plugging wells (with cement), removing wellhead equipment, and removing the processing module from the platform. Pipelines also must be decommissioned, which involves cleaning the pipeline, plugging the ends, and leaving it in place, buried within the seabed. Onshore pipelines may be used for other purposes, if not removed (MMS 2008b). All

[17] For the purposes of this evaluation, normal operations are considered exclusive of events leading up to the production of offshore oil and gas.

decommissioning activities would abide by Federal regulations. Due to the physical nature of these activities and the length of the leases, land use, development patterns, and infrastructure may be impacted directly. These impacts, however, generally would be site-specific. In some cases, pre-exploration and preconstruction conditions may not be able to be reestablished.

Local Land Use/Comprehensive Planning and Development Patterns. Depending on the location of the production wells and associated infrastructure, decommissioning activities onshore may be regulated by local land use, zoning, and comprehensive planning initiatives or requirements.

In turn, local planning initiatives often account for developments of this nature in future planning due to the length of operation. For instance, the continued use of the facilities after production could impact planned development in a positive manner, either by providing an opportunity for reuse of facilities or by allowing for the potential for additional or future oil and gas development.

Loss of Use to Existing Landowners or Users. No permanent loss of use is anticipated to occur during the decommissioning/reclamation phase. Some temporary loss may occur if road or area closures are necessary to accommodate equipment, workers, or specific activities associated with this type of process. Access to and the physical composition of the industrial/port areas typically would be restored to its preconstruction or operations state to the extent possible.

In addition, the use of individual properties in the vicinity of the decommissioning activities may be affected indirectly if excessive noise and air emissions were generated from equipment and onshore/offshore vehicular and air traffic (e.g., helicopters and automobiles), or if a small increase in the amount of trash and debris washing ashore were to result from the activities. These occurrences may cause disturbances or annoyance among particular landholders or users, thereby inhibiting the intended or actual use of a property. The level and extent of impact would depend on the specific location within the Arctic, but generally would be anticipated to be minimal.

Physical and/or Infrastructural Composition. In addition, potential changes to the physical and infrastructural composition of the Beaufort and Chukchi Seas would occur. Any equipment added may be removed; other defunct equipment also could be removed. These alterations would be site-specific and likely could range from negligible to minimal in the extent of their impact with regard to the existing composition of land use and infrastructure. Moreover, if any offshore or onshore infrastructure were deemed a visual intrusion within the landscape for the duration of the project, removal of the structure during decommissioning would remove the feature, and thus alleviate the intrusion (MMS 2003a).

4.4.10.3.2 Accidents. One anticipated effect of oil and gas development within the Arctic is to extend infrastructure (e.g., landfalls and platforms) and associated activities westward. As a result of this construction, new areas of Alaska adjacent to the Beaufort and Chukchi Seas would be exposed to the potential effects of crude oil spills. Approximately

3 large spills, 10 to 35 medium-sized spills, and 50 to 190 small spills are anticipated to occur with the proposed development of the Arctic Beaufort Sea (see Table 4.4.2-1). Consequently, crude oil spill-response equipment and personnel would be needed in those locations (MMS 2007c).

As with other areas of Alaska, potential indirect impacts on land use and infrastructure resulting from small, medium, or large spills would likely include moderate temporary stresses from the spill response on existing community infrastructure; oil contamination at a coastal area; increased boat and air traffic to respond to the spill and cleanup operations; and restrictions of access to a particular area while the cleanup is conducted (MMS 2007c). These occurrences could lead to a temporary loss of use of certain parcels for both their intended and actual uses.

Catastrophic Discharge Event. The PEIS analyzes a CDE as large as 1.4 to 2.2 million bbl in the Chukchi Sea and 1.7 to 3.9 million bbl in the Beaufort Sea (Table 4.4.2-2). A CDE would have similar types of impacts as spills of other magnitudes; however, the degree of impact would be more severe. For instance, the length of time in which the impacts would be experienced generally would be longer for this type of event (MMS 2007c; BOEMRE 2011k). Likewise, communities that are in close proximity to the event may experience a displacement of existing sociocultural patterns that could affect how they use the land (BOEMRE 2011k). In particular, this type of event would have major effects on communities using land for subsistence activities. These impacts are discussed in detail in Section 4.4.13.3.2.

4.4.10.4 Conclusion

The addition of new oil and gas leases within the GOM Planning Areas would result in negligible to minor impacts on land use, development patterns, and infrastructure. In general, the existing infrastructure would be expected to be sufficient to handle exploration and development associated with potential new leases.

Additional leases for oil and gas development would have a more noticeable impact on land use, development patterns, and infrastructure within Alaska. While Cook Inlet currently supports some oil and gas production, some minor impacts on land use, development patterns, and infrastructure would be anticipated to occur as a result of new leases. These impacts would vary in intensity dependent on specific location within the Inlet. The existing infrastructure would help to limit the intensity of the impacts as compared to Arctic locations, in which limited infrastructure is present and where communities are much smaller than within Cook Inlet.

Within the Arctic, minor to moderate impacts would be anticipated to result from the development of new oil and gas leases within the Beaufort and Chukchi Seas. Existing land use and infrastructure likely would be able to accommodate new leases. In general, land use changes would be needed only in locations where new onshore pipeline routes would be constructed, and in areas requiring new transportation networks (MMS 2007a).

In all three areas, the potential for accidents to occur would be present. These types of events could have both direct and indirect effects on land use, depending on the type, size,

location, and duration of the incident. Impacts generally would be more intense in areas with little infrastructure in place to handle accidents and where a greater reliance is placed on coastal activities for subsistence and would be greater in the event of a CDE-level spill.

4.4.11 Potential Impacts on Commercial and Recreational Fisheries

4.4.11.1 Gulf of Mexico

4.4.11.1.1 Routine Operations.

Commercial Fisheries. Routine operations could affect commercial fisheries by causing changes in the distribution or abundance of fishery resources, reducing the catchability of fish or shellfish, precluding fishers from accessing viable fishing areas, or causing losses of or damage to equipment or vessels. Between 200 and 450 new platforms would be established under the proposed action, with up to 2,500 ha (6,177 ac) of seafloor likely to be disturbed by offshore platforms and up to 11,500 ha (28,417 ac) by pipelines. Impacts on commercial fishing activities would vary depending on the nature of a particular structure, the phase of operation, the fishing method or gear, and the target species group. Impacts would be higher for drifting gear such as purse nets, bottom longlines, and pelagic longlines than for trawls and handlines (MMS 2005). Nevertheless, areas in which commercial fishing would be affected are small relative to the entire fishing area available to surface longliners or purse seiners.

To avoid potential conflicts and to maintain safety at large deepwater structures, a safety zone for vessels longer than 30 m (100 ft) may be established up to 500 m (1,640 ft) around each production platform, which would encompass up to approximately 80 ha (198 ac) of surface area per platform. The Fisherman's Contingency Fund, established under OSCLA, can compensate fisherman for property and economic losses related to obstructions caused by oil and gas development in the OCS. The Fund is composed of assessments paid by offshore oil and gas operations and administered by the NMFS (see www.nmfs.noaa.gov/mb/financial_services/fcf.htm).

Federal regulations (30 CFR 250.702(I)) require that, during decommissioning, all wellheads, casings, pilings, and other obstructions be removed to a depth of at least 5 m (15 ft) below the mud line or to a depth approved by the District Supervisor; the size of the area left untrawlable due to abandoned components would represent only a fraction of the total area excluded by oil and gas operations. Longlining would still be possible following decommissioning and removal because surface waters would not be affected by the presence of the remaining underwater components.

The impact of oil and gas structures on commercial fisheries at various depth ranges can be estimated using data in the Offshore Environmental Cost Model (OECM) (BOEMRE 2010d). The model assumes that there will be buffer zones of up to 0.8 km (0.5 mi) around new oil and gas structures, decreasing the area of ocean available for fishing. Although harvesting levels are

not affected by offshore structures and pipelines, as these levels are below federally mandated levels, it is assumed that fishing activity will continue in areas still open for fishing, with existing harvesting levels remaining, but that there will be an increase in fishing costs.

The impacts of oil and gas development on commercial fishing costs would vary considerably by planning region and placement depth (Table 4.4.11-1). In the Western Planning Area, the largest cost increases would occur with structures located in water between 150 and 300 m (492 and 984 ft) deep, with an annual increase of $93 in costs from a single structure; a single structure in each depth range would increase annual costs by $147. In the Central Planning Area, overall increases in costs would be much larger at $1,080 per year, with the largest increase coming with a single structure placed in water between 150 and 300 m (492 and 984 ft). Cost impacts in the Eastern Planning Area would be minimal, at $2 per year with a structure in each depth range. In each of the planning areas, single structures would have relatively insignificant impacts compared to fishery revenues in each depth range.

Under the proposed action alternative, between 44 and 80 platforms would be located in the depth range 0 to 60 m (0 to 197 ft) in the Western Planning Area, with between 122 and 257 such platforms in the Central Planning Area. Offshore oil and gas structures placed within this depth range would increase annual commercial fishing costs by between $1,993 and $3,819 in the Western Planning Area, while reducing costs by between $2,507 and $11,243 in the Central Planning Area. No data is currently available on the placement of offshore platforms in the Eastern Planning Area, and consequently, their impact on commercial fishing costs.

Recreational Fisheries. The level of impacts on recreational fisheries in the GOM due to routine operations under the proposed action would be similar to impacts during the previous lease period. Biological resources that serve as the basis for recreational fisheries in the GOM are expected to be only minimally affected by activities associated with routine operations. Construction activities would primarily affect soft bottom species such as red drum, sand sea trout, and spotted sea trout that are sought by anglers in private or charter/party vessels. Such conflicts would be temporary, however, as fishes would eventually return to disturbed areas. The presence of offshore platforms may have a positive effect on the availability of recreational fishing opportunities. During 1999, for example, approximately 20% of private boat fishing trips, 32% of charter boat fishing trips, and 51% of party boat fishing trips in the western and central GOM (Alabama, Mississippi, Louisiana, and Texas) took recreational fishers within 91 m (300 ft) of oil or gas structures (Hiett and Milon 2002), as the presence of structures is known to aggregate pelagic (e.g., king mackerels, tunas, and cobia) and reef-associated fish species (e.g., red snapper, gray triggerfish, and amberjack) that are targeted by many recreational fishers.

4.4.11.1.2 Accidents.

Commercial Fisheries. Under the proposed action, up to 8 large spills greater than 1,000 bbl, between 35 and 70 spills between 50 bbl and 1,000 bbl, and up to 400 small spills less than 50 bbl could occur within the northern GOM. Most of the fish species inhabiting shelf or oceanic waters of the GOM have planktonic eggs and larvae (Ditty 1986; Ditty et al. 1988; Richards and Potthoff 1980; Richards et al. 1993). Certain species, such as triggerfishes, deposit

TABLE 4.4.11-1 Impacts of Single Oil and Gas Structures on Commercial Fisheries, by Placement Depth ($2010)

	Western Planning Area		Central Planning Area		Eastern Planning Area	
Placement Depth Range	Fishery Revenue ($m)	Cost Impact ($)	Fishery Revenue ($m)	Cost Impact ($)	Fishery Revenue ($m)	Cost Impact ($)
0 to 60 m	103.4	41.24	153.5	–165.82	64.4	–0.52
60 to 150 m	22.6	16.73	40.4	21.00	17.7	0.24
150 to 300 m	8.3	92.89	26.1	916.09	9.4	–0.92
300 to 1,500 m	74.4	–5.95	180.3	224.17	22.3	2.15
More than 1,500 m	45.4	2.11	402.7	84.91	54.4	0.76
All depths	254.1	147.03	803.1	1,080.40	168.2	1.70

Source: BOEMRE 2010d.

demersal eggs but have larvae that take up residence in the water column, meaning that these species would also be affected by oil spills. Depending on the location and timing of particular spills, effects would be greater if local water currents retained planktonic larvae and floating oil within the same water mass for extended periods of time. In deepwater areas, adults of highly migratory fish species, including pelagic species such as tunas, sharks, and billfish, would move away from surface oil spills. Pelagic larvae and neuston would not be able to move away from the spilled oil on the surface and would most likely be killed or injured. However, these impacts are not expected to cause population reductions in most commercially exploited species. In coastal areas, moderate and long-term but temporary degradation of estuarine habitat could occur if a large coastal area was oiled following a large or very large oil spill. Although some wetland areas may not recover completely, it is anticipated that spills considered possible as a result of the proposed action are not likely to substantially threaten the overall viability of wetland habitats used by commercially important species. On the basis of the potential level of impacts on coastal habitats including wetlands and submerged seagrass beds under the proposed action, major declines in fish population are not likely to occur.

In general, the level of effects from accidental spills would depend on the location, timing, and volume of spills in addition to other environmental factors. Small spills would be unlikely to affect a large number of fish or commercial fishing before dilution and weathering reduced concentrations; therefore, they would not have long-term effects on commercial fisheries in the GOM. It is anticipated that any single large spill would affect only a small proportion of a given fish population within the GOM and that fish resources would not be permanently affected. However, localized effects on commercial fishing could result as a consequence of reduced catch, loss of gear, or loss of fishing opportunities during cleanup and recovery periods.

Recreational Fisheries. The magnitude of effects from accidental spills would depend on the location, timing, and volume of spills, in addition to other environmental factors. Small spills that may occur under the proposed action are unlikely to affect a large number of fish or

have a substantial effect on recreational fishing before dilution and weathering reduced concentrations of oil in the water. Consequently, it is anticipated that small spills would not have substantial or long-term effects on recreational fishing in the GOM. Any single large spill would likely affect only a small proportion of a given fish population within the GOM, and it is unlikely that fish resources would be permanently affected. However, spills could have localized effects on recreational fishing as a consequence of contamination of fish tissues, degradation of aesthetic values that attract fishers, or temporary closure of fishing areas. A CDE, such as occurred following the DWH accident, could have more noticeable impacts on recreational fishing activity, as well as on individuals and firms that depend on angler spending. Spill effects can be mitigated to some extent through financial compensation and through policies of Federal and State fisheries management agencies. On the basis of the number and size of spills assumed for the proposed action, persistent degradation of shorelines and waters are not likely to occur; therefore, impacts on recreational fishing are not expected to be significant. Impacts of spills on subsistence resources are also discussed in Section 4.4.13 and 4.4.14.

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges in size from 0.9 to 7.2 million bbl (Table 4.4.2-2). The magnitude of effects from a CDE would depend on the location, timing, and volume of the oil associated with the event. Oil from a CDE could contact intertidal habitat and subsequently contaminate or reduce the abundance of commercial and recreational species that depend on nearshore habitat. However, it is likely that an event would only affect a small proportion of fish species population, and it is unlikely that fish resources would be permanently affected. In the short term, there would be local or regional effects on commercial fishing that as a result of reduced catch, loss of gear, or loss of fishing opportunities during cleanup and recovery periods, and on recreational fishing as a consequence of contamination of fish tissues, the degradation of aesthetic values that attract fishers, and the likely temporary closure of fishing areas.

4.4.11.2 Alaska – Cook Inlet

4.4.11.2.1 Routine Operations.

Commercial Fisheries. With one to three new platforms to be established under the proposed action, up to 4.5 ha (11 ac) of seafloor would be disturbed by offshore platforms, and up to 210 ha (519 ac) by pipelines. Impacts on commercial fishing activities would vary, depending on the nature of a particular structure, the phase of operation, fishing method or gear, and target species group. Routine operations could affect commercial fisheries by causing changes in the distribution or abundance of fishery resources, by reducing the catchability of fish or shellfish, by precluding fishers from accessing viable fishing areas, or by causing losses of or damage to equipment or vessels. It is anticipated that routine operations would not result in detectable effects on overall populations of fishery resources in Cook Inlet. Temporary displacement of fishery resources from localized areas could occur as a consequence of noise and activities associated with construction activities during development; however, these resources would be expected to return once construction disturbances have been terminated. Following platform construction, there could be some highly localized long-term changes in fish densities

and species diversity in the vicinity of platforms due to attraction of some invertebrate and fish species.

Some exploration, development, and production activities have a potential to result in space use conflicts with commercial fishing activities. Seismic exploration vessels towing long cables have had a history of conflicts with the commercial fishing industry in Cook Inlet (MMS 2003a), including losses of crab pots, longlines, or other gear. In some cases, commercial fishing vessels could be excluded from normal fishing grounds to avoid the potential for gear loss. Such conflicts can sometimes be avoided by conducting seismic surveys during closed fishing periods or closed seasons. A potential also exists for loss of gear or access to fishing areas when floating drill rigs used for exploration are being moved and during other vessel operations.

Offshore construction of platforms could infringe on commercial fishing activities by excluding commercial fishing from adjacent areas due to safety considerations. It is assumed that up to three production platforms could be constructed as a consequence of leasing in the Cook Inlet Planning Area. If it is assumed that a safety zone of 500 m (1,640 ft) is maintained by larger vessels around each production platform, commercial fishing could be excluded from up to 160 ha (395 ac) of surface area within the planning area. Drilling discharges associated with exploration activities would likely affect only a small area near a drilling platform, and are not expected to interfere with commercial fishing. During development and production phases, potential effects of such discharges would cease because all muds, cuttings, and produced water would be discharged into wells instead of being released to open waters. Potential effects of platform construction and operation are expected to be highly localized. Because only a very small area of the Cook Inlet would be affected, interference with commercial fisheries is also expected to be small.

Construction of pipelines can result in entanglement hazards for some types of fishing gear. The presence of an offshore pipeline would not typically interfere with the use of longlines, purse seines, drift nets (MMS 2004a), or beach seines. However, a bottom trawl, such as those employed by the commercial groundfish industry in Cook Inlet, has a potential to become snagged on exposed pipelines. It is estimated that up to 241 km (150 mi) of additional offshore pipeline could result from lease sales in the Cook Inlet Planning Area, thereby increasing the potential for snagging on pipelines by bottom trawling equipment, unless subsea pipelines are buried in trenches.

It is anticipated that the small increase in vessel activity that could occur as a result of additional lease sales in Cook Inlet under the proposed action (up to six additional trips per week) would not measurably affect commercial fishing opportunities, catchability of fish and shellfish resources, or navigation by commercial fishing vessels.

The impact of oil and gas structures on commercial fisheries at various depth ranges can be estimated using data from the OECM (BOEMRE 2010d). The model assumes that there will be buffer zones of up to 0.8 km (0.5 mi) around new oil and gas structures, decreasing the area of ocean available for fishing. Although harvesting levels are not affected by offshore structures and pipelines, as these levels are below federally mandated levels, it is assumed that fishing

activity will continue in areas still open for fishing, with harvesting levels remaining, but that there will be an increase in fishing costs.

The impacts of oil and gas development on commercial fishing costs would vary considerably by placement depth (Table 4.4.11-2). In the Kodiak area, the largest cost increases would occur with structures located in water between 300 and 1,500 m (984 and 4,921 ft) deep, with an annual increase of $34 in costs from a single structure; a single structure in each depth range would increase annual costs by $44. In the Cook Inlet area, the largest increase would come with a single structure placed in water between 150 and 300 m (492 and 984 ft), with an overall increase in costs of $57 per year. In each of the areas, single structures would have relatively insignificant impacts compared to fishery revenues in each depth range.

Recreational Fisheries. In general, routine operations associated with exploration, development, or production activities could affect recreational fisheries by causing changes in the distribution or abundance of fishery resources, by reducing the catchability of fish and shellfish, by precluding fishers from accessing viable fishing areas, or by causing losses of or damage to equipment or vessels. It is anticipated that routine operations would not result in detectable effects on overall populations of fishery resources in Cook Inlet. Temporary displacement of fishery resources from localized areas could occur as a consequence of noise and bottom-disturbing activities associated with routine operations. Following platform construction, there could be long-term localized changes in fish densities and species diversity due to the attraction of some invertebrate and fish species to platforms.

Seismic surveys could temporarily affect the behavior of some targeted species, thereby affecting catch rates in the immediate area of the surveys. Some recreational anglers could decide to avoid areas during seismic surveys due to the potential for loss of fishing gear, due to the increased vessel activity, or because of perceived or actual changes in catchability. It is estimated that new areas in the Cook Inlet Planning Area could be subjected to seismic surveys

TABLE 4.4.11-2 Impacts of Single Oil and Gas Structures on Commercial Fisheries, by Placement Depth ($2010)

	Kodiak		Cook Inlet	
Placement Depth Range	Fishery Revenue ($m)	Cost Impact ($)	Fishery Revenue ($m)	Cost Impact ($)
0 to 60 m	15.6	–3.34	7.3	–0.04
60 to 150 m	43.7	9.87	2.6	3.88
150 to 300 m	22.8	3.32	7.0	53.50
300 to 1,500 m	23.4	34.07	0.1	0.0
More than 1,500 m	1.3	0.26	0.0	0.0
All depths	106.9	44.18	17.0	57.35

Source: BOEMRE 2010d.

during the Program. However, given the relatively small proportion of the available Cook Inlet area that would be affected at any particular time, it is not anticipated that seismic surveys would greatly disrupt recreational fishing activities.

Offshore construction of platforms could infringe on some recreational fishing activities by excluding recreational fishing boats from adjacent areas for safety considerations. It is assumed that up to three production platforms could be constructed as a consequence of lease sales in the Cook Inlet Planning Area. However, the area lost to recreational fishing would be limited to the immediate footprint of the platforms plus a small safety zone surrounding each platform; only a very small proportion of available recreational fishing areas in Cook Inlet would be affected. The presence of such platforms could also benefit anglers by aggregating some pelagic or groundfish species.

Vessel traffic to provide support to OCS activities could increase by one to three trips per week. This would constitute a very small increase in overall vessel traffic in Cook Inlet. The potential increase in daily helicopter trips in the Cook Inlet area would not be expected to affect recreational fishing activities. Disturbances of recreational fishing opportunities from other activities associated with routine operations (e.g., pipeline construction) are also expected to be relatively minor and temporary.

4.4.11.2.2 Accidents.

Commercial Fisheries. Fisheries resources could become exposed to oil as a consequence of accidental oil spills. One large spill greater than 1,000 bbl, up to 3 spills between 50 and 1,000 bbl, and up to 15 small spills less than 50 bbl could occur in the Cook Inlet area from the proposed action.

Although pelagic fishes would be less likely to be affected than fishes in shallow subtidal or intertidal areas, oil spills could contaminate gear used for commercial fishing, such as purse seines and or drift nets. A large oil spill before or during the season when such fishing gears are in use could result in closures of some short-period, high-value commercial fisheries in order to protect gears or harvests from potential contamination. Lines from longline fisheries for halibut, Pacific cod, black cod, and other fish species could also be affected by oil. Some lines and buoys fouled with small amounts of oil could be unfit for future use. Although it is unlikely that a trawler would be operating in an oiled area, the trawl catches could be contaminated by oil and rendered unfit for consumption if the trawler did pass through such an area.

The bays and beaches of Cook Inlet have a number of setnet sites where gillnets are anchored to the beach or slightly offshore, and are used to harvest salmon and herring. Oil spills could damage setnet fisheries, as evidenced by the *Exxon Valdez* oil spill in 1989. While only a relatively small volume of weathered oil entered the lower Cook Inlet region as a result of the *Exxon Valdez* spill, the commercial salmon fishery was closed to protect both gear and the harvest from possible contamination.

Multiple small spills or a single large spill could cause declines in subpopulations of some species inhabiting the Cook Inlet Planning Area, although the level of effects would depend on a variety of factors. It is anticipated that there would be no long-term effects on overall fish populations in the central Gulf of Alaska. However, even localized decreases in stocks of fish could have effects on some commercial fisheries by reducing their catch or increasing the amount of effort or the distances that must be traveled to obtain adequate catches. Even if fish stocks are not reduced as a consequence of a spill, specific fisheries could be closed due to actual or perceived contamination of fish or shellfish tissues. Larger spills in Cook Inlet would probably result in the area being temporarily closed to commercial fishing until cleanup operations or natural processes reduced oil concentrations in fishery areas to levels considered safe. The Cook Inlet commercial shellfish industry is likely to be affected by closures because such a spill would be likely to affect shellfish in nearshore subtidal and intertidal areas. Fisheries for shellfish that occur in deeper waters, where oil residues seldom reach, are less likely to be closed. Shellfish from deeper areas could become commercially unacceptable for market due to actual or perceived contamination and tainting.

Closure of Cook Inlet to commercial fishing activities could result in considerable loss of income. Based on analyses conducted by MMS for Cook Inlet oil spills of the same sizes assumed for large spills in this analysis and assumptions about the value of commercial fisheries in Cook Inlet, it was estimated that a large oil spill in lower Cook Inlet could result in economic losses to commercial fisheries for up to 2 yr (MMS 2003a), and, depending on the timing and location of a spill, it was also considered possible that the fishery could be closed for a whole season, resulting in a 100% loss for a given year.

Recreational Fisheries. Recreational fishery resources could be exposed to oil as a consequence of accidental oil spills. Up to 1 large spill greater than 1,000 bbl, up to 2 spills between 50 and 1,000 bbl, and up to 10 small spills less than 50 bbl could occur in the Cook Inlet area from the proposed action.

While it is anticipated that these spills would not affect the overall populations of fishes in the central Gulf of Alaska, some fish stocks in localized areas of Cook Inlet could be affected. Populations of intertidal organisms could be depressed measurably for a year or more in intertidal areas contacted by spilled oil. Oil contacting beaches could affect clam gathering by depressing clam populations or tainting tissues of clams. The magnitude of such effects would depend upon many factors, including the volume of oil spilled, weather conditions, prevailing currents, locations, oil spill response actions, and whether the oil reached sensitive habitats for fishery resources. Declines in localized fish stocks could affect recreational fishing success and businesses associated with providing recreational and sport fishing opportunities.

An oil spill could result in a closure of ports in an effort to protect the ports and vessels from being oiled. Oil spills could potentially cause economic losses for boat owners and anglers by contaminating vessels and fishing gear. Oiled vessels would need to be cleaned and oiled gear either cleaned or replaced; potential individual costs are expected to be relatively small. It is anticipated that many anglers would choose to fish in alternate areas in the event of port closures. Charter operators could be inclined to temporarily avoid going out of port into Cook Inlet to avoid fouling their gear and vessels with oil. Public perception of oil spill damage could

temporarily reduce the number of anglers. If so, anglers would likely target alternate fishing areas until they deemed that the quality of the fishing experience in the oil spill area had returned to previous conditions.

While charter operators could lose business in the event of a large spill, a report on the July 2, 1987, *Glacier Bay* tanker oil spill found "no measurable impacts" on sportfishing from that spill (Northern Economics 1990). It is estimated that 3,100 bbl of oil were spilled. Although several popular sportfishing runs had already ended when the spill occurred, the busiest season was beginning for the halibut charter boat fishery, and the second-run Kenai salmon sport fishing season was just opening for the year. The study found no evidence of losses in these sportfisheries due to oil-fouled boats or gear, loss of fishing opportunity, or harvest of oil-fouled fish that had to be discarded (with only one exception). In addition, the numbers of fish caught did not appear to be affected, and customers did not cancel reservations because of concerns about the spill. Very large oil spills could have greater impacts, especially if the oil reached large areas of intertidal habitat. Studies following the *Exxon Valdez* oil spill suggest that a very large oil spill could have the potential to reduce or contaminate populations of recreationally popular salmon and shellfish in heavily oiled areas for more than 10 yr. For example, pink salmon had elevated egg mortality for at least 4 yr after the spill (Peterson et al. 2003), and littleneck and butter clam populations were reduced for a decade after the spill, although much of the slow recovery may have resulted from cleanup methods used in intertidal areas (*Exxon Valdez* Oil Spill Trustee Council 2009a). Contamination of shellfish may persist even after populations recover. Species less dependent on intertidal soft sediments, such as rockfish, are less likely to be affected. Impacts of spills on subsistence resources are discussed in Section 4.4.13 and Section 4.4.14.

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges in size from 75 to 125 thousand bbl (Table 4.4.2-2). The magnitude of effects from a CDE would depend on the location, timing, and volume of the oil associated with the event. Oil from a CDE could contact intertidal habitat and subsequently contaminate or reduce the abundance of commercial and recreational species that depend on nearshore habitat. However, it is likely that an event would only affect a small proportion of fish species population, and it is unlikely that fish resources would be permanently affected. In the short term, there would be local or regional effects on commercial fishing that as a result of reduced catch, loss of gear, or loss of fishing opportunities during cleanup and recovery periods, and on recreational fishing as a consequence of contamination of fish tissues, the degradation of aesthetic values that attract fishers, and the likely temporary closure of fishing areas.

4.4.11.3 Alaska – Arctic

4.4.11.3.1 Routine Operations. There is a relatively small salmon fishery in Kotzebue Sound in Hope Basin, but there are no commercial fisheries in the Chukchi Sea Planning Area where routine operations would occur (MMS 2006b). Consequently, no impacts from routine operations are anticipated. The single commercial fishery in the Beaufort Sea is for cisco and whitefish on the Colville River during the summer and fall months. The potential for negative

effects on this fishery would be related to the timing of exploration and development activities and the proximity of those activities to the mouth of the Colville River. Because exploration and development of this area has already occurred, it is considered unlikely that there would be substantial levels of additional development as a result of the proposed action. In addition, impacts would be limited in scope as a result of adherence to mitigation measures and compliance with Federal, State, and local requirements. Therefore, impacts on this fishery are also anticipated to be limited in scope. Similarly, impacts on recreational fisheries from routine operations are expected to be negligible, as little recreational fishing occurs in the Beaufort and Chukchi Sea Planning Areas (NPFMC 2009).

4.4.11.3.2 Accidents. Up to 3 large spills greater than 1,000 bbl, between 10 and 35 spills between 50 and 1,000 bbl, and up to 190 small spills of less than 50 bbl could occur in the Beaufort and Chukchi Sea areas from the proposed action.

Recreational fishing in the Beaufort and Chukchi Sea Planning Areas is very limited and generally occurs only at larger population centers. However, where and when recreational fishing does occur, an oil spill could reduce fishing activity or contaminate fishery resources. Commercial fishing in the Beaufort and Chukchi Sea Planning Areas is restricted to the Colville River. The occurrence of an oil spill near commercial fishing areas during the fishing season could have effects on particular fisheries and the local economies that depend on them. Oil spills typically result in the closure of fishing grounds and reduced or lack of harvest. Even if harvest continues, the perception of a tainted product could reduce the economic value of fish harvested in the vicinity of an oil spill or could even cause fish to be removed from markets.

Spills could foul fishing gear, result in fish contamination and mortality, and potentially close some fishing grounds or entire fisheries for one or more years. A large spill could also increase competition on alternative fishing areas that remain open, resulting in increased costs and/or reduced harvests for individual fishermen. There is a reduced chance of a spill occurring during pulse fisheries of short duration, such as those for salmon, herring, or whitefish, because of the relatively short period of time that such fisheries are open. However, if a spill were to occur during operation of such a fishery, potential impacts would include a total loss of commercial fishing harvest due to the inability to switch to an alternative fishing time or area. Impacts of spills on subsistence resources are discussed in Section 4.4.13 and Section 4.4.14.

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges in size from 1.4 to 2.2 million bbl in the Chukchi Sea Planning Area and from 1.7 to 3.9 million bbl in the Beaufort Sea Planning Areas (Table 4.4.2-2). The magnitude of effects from a CDE would depend on the location, timing, and volume of the oil associated with the event. Oil from a CDE could contact intertidal habitat and subsequently contaminate or reduce the abundance of commercial and recreational species that depend on nearshore habitat. However, it is likely that an event would only affect a small proportion of fish species population, and it is unlikely that fish resources would be permanently affected. Although commercial and recreational fishing in the Arctic region are of minor economic significance, in the short term, there would be local and regional economic impacts resulting from reduced catch, loss of gear, or loss of fishing opportunities during cleanup and recovery periods, and on recreational fishing as a consequence

of contamination of fish tissues, the degradation of aesthetic values that attract fishers, and the likely temporary closure of fishing areas.

4.4.11.4 Conclusion

Routine operations could affect commercial fisheries by causing changes in the distribution or abundance of fishery resources, by reducing the catchability of fish or shellfish, precluding fishers from accessing viable fishing areas, or causing losses of or damage to equipment or vessels. No population-level effects or permanent loss of fishery resources are expected to result from routine operations in the GOM or Cook Inlet. Commercial and recreational fisheries in the Beaufort and Chukchi Sea Planning Areas are relatively small and localized. Impacts on these fisheries are unlikely, since OCS activities would not occur in the immediate area near these fisheries. Impacts to commercial and recreational fisheries from routine Program activities are expected to be minor.

The magnitude of effects from accidental spills would depend on the location, timing, and volume of spills, in addition to other environmental factors, and would be greatest in the event of a CDE-level spill. Small spills that may occur under the proposed action are unlikely to affect a large number of fish or have a substantial effect on recreational fishing before dilution and weathering reduced concentrations of oil in the water. Consequently, it is anticipated that small spills would have little effect on commercial and recreational fishing. Any single large spill would likely affect only a small proportion of a given fish population within the GOM, Cook Inlet, and Beaufort and Chukchi Seas, and it is unlikely that fish resources would be permanently affected. However, large spills could have localized effects on commercial fishing that could result as a consequence of reduced catch, loss of gear, or loss of fishing opportunities during cleanup and recovery periods, and on recreational fishing as a consequence of contamination of fish tissues, degradation of aesthetic values that attract fishers, or temporary closure of fishing areas. Oil from large or very large spills could contact intertidal habitat and subsequently contaminate or reduce the abundance of commercial and recreational species that depend on nearshore habitat. Impacts from a large spill could be long term, but are not expected to result in permanent loss of fishery resources. In the event of a CDE-level spill, fisheries recoveries could be impacted on a manner similar to that from a large spill. However, a larger proportion of a fish population could be affected, and impacts could be much more long-term on duration.

4.4.12 Potential Impacts to Tourism and Recreation

4.4.12.1 Gulf of Mexico

4.4.12.1.1 Routine Operations. In addition to the continuing use of existing onshore support and processing facilities, between 4 and 6 new pipeyards, less than 12 new pipeline landfalls, and as many as 12 new gas processing facilities are projected to be built as a result of

the Program. Additional offshore construction could include increased noise and traffic, air and water pollution, impacts on residential property values, and land use changes. As it is likely that onshore facilities would be placed near other commercial areas zoned for such development, certain coastal areas could also be closed temporarily to accommodate the construction of new facilities, while underground pipeline construction could occur near important recreational areas. Routine operations would have limited effects on recreation and tourism, with potential adverse aesthetic impacts on beach recreation and sightseeing and potential positive impacts on diving and recreational fishing.

The proposed action is expected to result in 300 to 600 service-vessel trips and 2,000 to 5,500 helicopter operations weekly. Although service vessels are assumed to use established nearshore traffic lanes and helicopters are assumed to comply with areal clearance restrictions at least 90% of the time, additional helicopter and vessel traffic would add a low level of noise pollution that could affect beach users. Routine OCS traffic can cause minor disturbances to recreational resources, particularly beaches, through increased levels of noise, debris, and rig visibility. Although the proposed action has the potential to directly and indirectly impact recreational resources along the GOM coast, the small scale of OCS activities relative to the scale of the existing oil and gas industry is such that these potential impacts on recreational resources are likely to be minimal. There may also be minor space-use conflicts with recreational fishermen during the initial phases of the proposed action and low-level environmental degradation of fish habitat, which would negatively impact recreational fishing activity. However, these minor negative effects would likely be outweighed by the beneficial role that oil rigs serve as artificial reefs for fish populations. The degree to which oil platforms will become a part of a particular State's rigs-to-reefs program will be an important determinant of the degree to which the proposed action will impact recreational fishing activity in the long term.

The broader economic implications of the proposed action would be felt primarily on the GOM coast of Texas. The Texas coastline features an important barrier island system that supports a broad range of beach-related activity, and the visual, debris, and noise related issues could impact beach-related activity at these locations. However, given the expansive oil and gas industry already in place, as well as the distance oil platforms in Texas maintained from shore, beach-related disruptions due to OCS operations are expected to be minimal.

4.4.12.1.2 Accidents. Up to 8 large spills greater than 1,000 bbl, between 35 and 70 spills between 50 and 1,000 bbl, and up to 400 small spills less than 50 bbl could occur in the GOM from the proposed action. It is reasonable to expect that most of these spills will occur in deepwater areas located away from the coast, based on the established trend for oil and gas activity to move into deep waters located for the most part at a substantial distance from the coast.

Temporary impacts would occur if an oil spill reached a beach or other recreational use area. The magnitude of these impacts would depend on factors such as the size and location of the spill, and would likely be greatest if the spill occurred during the peak recreational season. A

number of studies (see Section 3.1.3) have shown that there could be a one-time seasonal decline in tourist visits of 5 to 15% associated with a major oil spill.

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges from 0.9 to 7.2 million bbl (Table 4.4.2-2). The effects from a catastrophic discharge event would likely include beach and coastal access restrictions, including restrictions on visitation, fishing, or hunting while cleanup is being conducted, and aesthetic impacts associated with the event itself and with cleanup activities. These impacts are expected to be temporary, with the magnitude dependent on the location and size of the event and the effectiveness of cleanup operations. Longer-term impacts may also be substantial if tourism were to suffer as a result of the real or perceived impacts of the event, or if there were substantial changes to tourism and recreation sectors in the region as a result of the event.

4.4.12.2 Alaska – Cook Inlet

4.4.12.2.1 Routine Operations. Although no new pipe yards, pipeline landfalls, or gas processing facilities would be built as a result of the proposed 5-yr program, additional offshore construction could include increased noise and traffic, air and water pollution, impacts on residential property values, and land use changes. Oil and gas development under the proposed action in the south central Alaska region would occur in the vicinity of previous development. The additional development would not alter the character of the area, because similar infrastructure is already present. Effects on scenic quality would be temporary and localized, and would be most noticeable during heavy periods of industrial activity, such as during drilling or pipelaying. Temporary closure of certain areas to recreation would likely be necessary, but would be limited in size and duration. A small increase in the amount of trash and debris washing ashore may also occur as a result of the development. The frequency of helicopter and vessel traffic to and from the new platforms would be consistent with that of existing platforms, but would contribute marginally to the impact on scenic quality and add to the industrial noise. The magnitude of these impacts would be small and vary with the distance of these activities from existing parks and wildlife refuges, primary recreational use areas, and cruise line paths. During the short period of construction, the increased workforce could impact lodging accommodations for tourists during peak times; however, impacts would depend on the timing and location of the activities and the availability of a local workforce.

4.4.12.2.2 Accidents. One large spill greater than 1,000 bbl, up to 3 spills between 50 and 1,000 bbl, and up to 15 small spills less than 50 bbl could occur in the Cook Inlet area from the proposed action. These oil spills would be responded to primarily by existing response facilities along the coast and existing shore bases according to spill response protocols. Potential impacts on recreation and tourism resulting from an oil spill would likely include direct land use impacts (e.g., from oil contamination at a coastal area), access restrictions to a particular area (e.g., no fishing or hunting while cleanup is conducted), and aesthetic impacts of the spill itself and cleanup operations. These impacts are expected to be temporary, but could last an entire season. However, because of public perceptions resulting from the *Exxon Valdez* oil spill in

Prince William Sound, tourism in the region may respond more strongly than would tourism in other regions. The magnitude of the impacts would depend on the location and size of the spill and the effectiveness of cleanup operations.

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges in size from 75 to 125 thousand bbl (Table 4.4.2-2). The effects from a CDE would likely include beach and coastal access restrictions, including restrictions on visitation, fishing, or hunting while cleanup is being conducted, and aesthetic impacts associated with the event itself and with cleanup activities. These impacts are expected to be temporary, with the magnitude dependent on the location and size of the event and the effectiveness of cleanup operations. Longer-term impacts may also be substantial if tourism were to suffer as a result of the real or perceived impacts of the event, or if there were substantial changes to tourism and recreation sectors in the region as a result of the event.

4.4.12.3 Alaska – Arctic

4.4.12.3.1 Routine Operations. Although no new pipe yards, pipeline landfalls, or gas processing facilities would be built as a result of the proposed 5-yr program, additional offshore construction could include increased noise and traffic, air and water pollution, impacts on residential property values, and land use changes. Oil and gas development activities could result in minor impacts on recreation and tourism in the Arctic region. The main recreation and tourism activities that could be impacted by routine oil and gas operations would be sightseeing, hiking, and rafting. Fishing in this region is primarily a subsistence activity rather than a recreational activity. Impacts on sightseeing might be viewed as being negative, with adverse aesthetic impacts from offshore platforms and possible increases in construction projects for gas processing facilities and new offshore pipelines to connect to existing onshore pipelines in the Chukchi Sea area. Impacts on these recreational activities would depend on the proximity of the new construction to the recreational use areas (such as whether they are in view of existing parks and refuges).

The additional development would not alter the character of the area, as similar infrastructure is already present. Effects on scenic quality would be temporary and localized, and would be most noticeable during heavy periods of industrial activity, such as during drilling or pipelaying. Temporary closure of certain areas to recreation would likely be necessary, but would be limited in size and duration. A small increase in the amount of trash and debris washing ashore may also occur as a result of the development. The frequency of helicopter and vessel traffic to and from the new platforms would be consistent with that of existing platforms, but would contribute marginally to the impact on scenic quality and add to the industrial noise. The magnitude of these impacts would be small and vary with the distance of these activities from existing parks and wildlife refuges and primary recreational use areas. During the short period of construction, the increased workforce could impact lodging accommodations for tourists during peak times; however, impacts would depend on the timing and location of the activities and the availability of a local workforce.

4.4.12.3.2 Accidents. Up to 3 large spills greater than 1,000 bbl, up to 35 spills between 50 and 1,000 bbl, and up to 190 small spills of less than 50 bbl could occur in the Beaufort and Chukchi Sea area from the proposed action. These spills would be responded to primarily by existing response facilities along the coast and existing shore bases according to spill response protocols. Potential impacts to recreation and tourism resulting from an oil spill would likely include direct land use impacts (e.g., from oil contamination at a coastal area), access restrictions to a particular area (e.g., no fishing or hunting while cleanup is being conducted), and aesthetic impacts (e.g., view of spill and cleanup activities). These impacts are expected to be temporary, and the magnitude of the impacts would depend on the location and size of the spill and the effectiveness of cleanup operations. The greatest potential impacts would occur from large spills in shallow water. The potential for impact would likely decrease with decreasing spill size and increasing water depth.

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges from 1.9 to 2.2 million bbl in the Chukchi Sea Planning Area, and from 1.7 to 3.9 million bbl on the Beaufort Sea Planning Area (Table 4.4.2-2). The effects from a CDE would likely include beach and coastal access restrictions, including restrictions on visitation, fishing, or hunting while cleanup is being conducted, and aesthetic impacts associated with the event itself and with cleanup activities. These impacts are expected to be temporary, with the magnitude dependent on the location and size of the event and the effectiveness of cleanup operations. Longer-term impacts may also be substantial if tourism were to suffer as a result of the real or perceived impacts of the event, or if there were substantial changes to tourism and recreation sectors in the region as a result of the event.

4.4.12.4 Conclusion

Routine operations would have minor, short-term negative effects on recreation and tourism, with potential adverse aesthetic impacts on beach recreation and sightseeing and potential positive impacts on diving and recreational fishing in the GOM coast; sightseeing, boating, fishing, and hiking activities in the Cook Inlet area; and sightseeing, hiking, and rafting activities in the Chukchi Sea and Beaufort Sea Planning Areas.

Temporary impacts would occur if an oil spill reached a beach or other recreational-use area in the GOM or Cook Inlet. The magnitude of these impacts would depend on factors such as the size and location of the spill, and would likely be greatest if the spill occurred during the peak recreational season. In the event of a CDE-level spill, impacts to tourism and recreation would be long-term and substantial.

4.4.13 Potential Impacts to Sociocultural Systems

4.4.13.1 Gulf of Mexico

As discussed in Section 3.4.1.1, the counties in the GOM coastal commuting zone include a diverse mixture of social classes, cultures, ethnic groups, and communities. They also include a well-established oil and gas industry and support structure focused mainly in Louisiana and Texas. The activities covered under the Program would tend to maintain existing onshore facilities rather than require new ones (MMS 2006a, 2008a). While oil and gas facilities are dispersed along the central and western coast of the GOM, they are not spread evenly. Terrebonne, Plaquemine, and Lafourche parishes in Louisiana are the heart of the oil and gas support industry (MMS 2008a) with Port Fourchon catering to 90% of all GOM deepwater production (BOEMRE 2011a). Sociocultural impacts from routine operations would be small, while impacts from a low-probability catastrophic discharge event could be significant.

4.4.13.1.1 Routine Operations. Routine OCS gas and oil operations include exploration, development, operation, and decommissioning. Although tied to the shore by aircraft, supply vessels, and pipelines, these activities occur well offshore and in increasingly deeper water. The global nature of deepwater activities has contributed to cultural heterogeneity with the importation of migrant workers. A recent study reports that industry employers often hire foreign-born Mexican and Laotian workers in upstream support sectors such as ship and fabrication yards (Hemmerling and Colton 2004). The greater distance of deepwater platforms from coastal communities has resulted in workers being drawn from a wider range of locations in the GOM region, making the ties between local subcultural groups and the offshore industry less consistent. The move father offshore into deep water has also led to longer offshore work shifts and to more “on call” schedules for many workers, including technical experts and mariners (Austin et al. 2002). In the past, development of infrastructure within coastal wetlands has contributed to the shrinking of wetlands and loss of land in Louisiana, resulting in a loss of both subsistence and commercial harvesting areas. However, most new production will be able to tie into the existing pipeline system, so it is unlikely that many new pipeline channels will need to be dredged. Current practice is for pipeline channels to be backfilled, reducing wetland erosion and partitioning of habitat (Hemmerling and Colton 2004).

4.4.13.1.2 Accidents. Accidental spills, including oil spills, chemical spills, vessel collisions, and loss of well control, are possible under the Program (MMS 2008a) (see Section 4.4.2). Between 200 and 400 spills of 50 bbl or less, 35 to 70 spills between 50 and 1,000 bbl, and 8 large spills greater than 1,000 bbl are posited for the GOM Program. Most accidental spills on this scale are likely to be short term and localized. Those occurring well offshore are likely to be cleaned up or dissipate before reaching shore, and would thus have little effect on onshore communities (MMS 2006a). Those occurring in coastal waterways involving OCS support vessels or pipelines (BOEMRE 2011a) would have localized effects on wild resources harvested either commercially or for subsistence purposes. Intertidal and estuarian habitats, where shellfish are harvested and the juveniles of harvested species develop, are the

most vulnerable. Most adult fish species seem to be better able to avoid oiled waters. Impacts from small and moderate coastal spills are likely to have localized and short-lived effects. Large spills (over 1,000 bbl) and especially spills of sufficient size to overwhelm cleanup and booming efforts, could significantly affect communities dependent on harvesting renewable wild resources either commercially or for subsistence purposes.

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges in size from 0.9 to 7.2 million bbl (Table 4.4.2-2). A CDE would have significant sociocultural consequences for populations employed in offshore oil and gas production and in commercial fishing and shrimping, and engaged in subsistence harvesting. A catastrophic discharge event would result in negative and long-lasting social effects (BOEMRE 2011b). Recent studies have shown that major oil releases result in negative and long-lasting social effects. Unlike devastation from hurricanes or other natural disasters that tend to bring communities together to face a common tragedy, oil spills tend to have divisive effects. Technical disasters such as oil spills are deemed as preventable, have a person or organization viewed as primarily responsible, and often can lead to litigation that can last for years (Picou et al. 2009). For example, during the DWH release, large areas of the GOM were closed to all shrimping and fishing (NMFS 2010, 2011). The loss of work placed financial stress on workers in that industry. Some, but not all, shrimpers and fishing boats were employed in the cleanup, creating a division between those who received some financial relief through the cleanup effort and those who did not. The loss of income and potential loss of some subsistence sources create emotional stress stemming from financial stress, often resulting in depression and post-traumatic stress disorder in those who depend on the renewable resources of the sea for their livelihood. An increase in sociological disorders such as domestic violence, substance abuse, and suicide was observed in communities affected by the *Exxon Valdez* spill (Picou and Arata 1997). Similar patterns appear to be emerging among populations that are heavily dependent on fishing along the GOM coast (Picou et al. 1999; Picou 2010), especially among fishing communities already hard hit by Hurricane Katrina (Yeoman 2010). Methods for mitigating social stress by creating a therapeutic community based on a model developed for the *Exxon Valdez* spill are being implemented in the GOM (SAMHSA 2010; MASGC 2011).

While only a small portion of those who live along the northern coast of the GOM are engaged in subsistence harvesting, if oil from a catastrophic discharge event were to reach the shore, it could affect the barrier islands and wetlands important to the harvesting of subsistence resources, including waterfowl, fish, shrimp, and shellfish. If coastal fisheries were contaminated or closed, it would have a significant effect on subsistence harvesting. As a result of the DWH event, close to 30,000 emergency advance payment claims were filed based on the loss of subsistence resources (BOEMRE 2011a). Loss of subsistence resources has economic, nutritional, and cultural consequences.

4.4.13.2 Alaska – Cook Inlet

Finding and developing oil and gas resources on the Cook Inlet OCS has the potential to create adverse effects on sociocultural systems and subsistence. Such effects would range from minor to major depending on the timing, location, and scale of the activity. Many negative

consequences could be minimized through appropriate mitigation procedures. The most central of these is establishing and maintaining communication among Native villages, oil companies, and appropriate Federal agencies, including both government-to-government consultation in compliance with legal requirements and U.S. Department of the Interior (USDOI) policy (USDOI 2001) and ongoing dialogue leading to adaptive management of adverse effects.

The areas surrounding the Cook Inlet Planning Area are demographically diverse, including isolated subsistence-based Native villages, towns that rely primarily on commercial fishing, and ethnically and economically diverse cities partly dependent on the oil industry. There have been oil and gas operations in Cook Inlet since the late 1950s, and the surrounding area is home to a well-established gas and oil infrastructure that could accommodate much of any newly developed resource. As discussed in Section 4.4.1.2, under the proposed action, no new shore bases would be constructed, and one new pipeline landfall and possibly one new natural gas processing facility would be built.

Rural communities in the area benefit from oil and gas development throughout the State. However, currently the Federal Government does not share revenues from oil and gas leasing on the OCS with the States, although Alaska has received Federal Coastal Impact Assistance Program (CIAP) funding, because it is an OCS State (Hess 2011; BOEMRE 2011m). Benefits from revenue sharing would only occur if Congress authorizes the sharing of OCS revenues with the OCS States. If such sharing were to occur, OCS activities could be expected to have effects on Alaskan rural communities, through various State programs, proportionate to the percentage of the State budget that relies on revenues from OCS oil and gas production and that is allocated to the affected communities. For the period of the Program, the allocated revenues from OCS oil and gas production would be relatively small.

4.4.13.2.1 Routine Operations. Routine operations under the Program would include exploration for oil and gas resources, development of the resources including infrastructure, operation of the facilities, and decommissioning of the facilities. Each of these phases is characterized by different levels of activity, different extent, and different timing. Because the region as a whole has already undergone oil and gas development, each of these phases can take advantage of and tie into existing infrastructure and can draw on an existing pool of experienced workers (MMS 2003a). The Cook Inlet area has already experienced the impacts of oil and gas development, and would also experience both the positive and negative effects of increased population and employment from the proposed OCS activities. Most area communities are ethnically diverse, with Caucasian majority populations. Native communities tend to be more remote and more difficult to access than non-Native communities, and would be somewhat buffered from the impacts of the proposed action. Overall, impacts of routine operations on sociocultural systems are expected to be minor.

Exploration activities include seismic surveys and the drilling of test wells, activities that are typically conducted from self-contained vessels. Exploration crews would be drawn from an existing pool of trained oil and gas workers in the Cook Inlet area. In-migration for these jobs is expected to be minimal and to have little effect on the current ethnic composition or social structure of the area (MMS 2003a). Exploration activities would likely be supported from

existing air and marine facilities on the Kenai Peninsula. No additional facilities would be required. Industrial activities associated with exploration would not be new to the area, but would continue existing operations. There would be very little in-migration for exploration jobs because of the existing trained labor pool and the fact that exploration rig crews are normally contracted with the vessel. Exploration activities are not expected to result in measurable changes in the availability or accessibility of subsistence resources.

Exploration activities could have temporary effects on subsistence harvesting, but are not expected to result in measurable changes in the availability or accessibility of subsistence resources. Cook Inlet personal use and subsistence fisheries are important to all residents of South Central Alaska. Since the Cook Inlet Planning Area lies outside of the Anchorage-Mat-Su-Kenai Peninsula Nonsubsistence Use Area, effects on personal use fishing are not expected. Most of upper Cook Inlet north of Ninilchik is included in the Anchorage-Mat-Su-Kenai Peninsula Nonsubsistence Use Area. While subsistence fishing is not authorized by the Alaska Board of Fisheries in this area, personal use fisheries, open to all Alaska residents who have lived in the state for at least a year, do exist on the Kenai and Kasilof Rivers and Fish Creek that provide an important food source for many families in the Mat-Su-Anchorage-Kenai area (SCADA 2011). More remote subsistence fisheries are accessible to rural communities where customary and traditional uses of fish and wildlife are a principal characteristic of the economy, culture, and way of life. These include Alaska Native communities (ADFG 2011), such as the community of Tyonek, on the west shore of Cook Inlet, and Port Graham and Nanwalek, located on the southern Kenai Peninsula and the Alaska Native communities along the northwestern shore of Kodiak Island.

The effects of exploration on subsistence fishing would be similar to the effects discussed for recreational and commercial fishing in Section 4.4.11.2. Seismic exploration vessels tow long lines that could be entangled with seines, gillnets, long lines, and other gear used by subsistence fishers (MMS 2003a), who may choose to avoid seismic vessels to prevent the loss of gear and thus be kept from their normal fishing grounds. Fishers may also choose to avoid floating exploratory drilling rigs being moved from one location to another for safety reasons and to prevent the loss of gear. Seismic surveys could temporarily affect the behavior of some targeted species, thereby temporarily affecting catch rates in the immediate area of the surveys. Some subsistence fishers could decide to avoid areas during seismic because of perceived or actual changes in catchability. New areas in the Cook Inlet Planning Area could be subjected to seismic surveys during the Program. However, given the relatively small proportion of the available Cook Inlet area that would be affected at any particular time, it is not anticipated that seismic surveys would greatly disrupt subsistence fishing activities. Platform installation activities associated with exploration could temporarily displace seals and possibly some whales from installation sites and because of the noise and movement of aircraft. It is estimated that displaced animals would return to normal behavior and distribution once the operation is complete (MMS 2003a). Effects on subsistence harvesting would vary with the size and duration of the operation.

There would be some direct effects on the subsistence harvest from noise and drilling discharges. Under Federal authority, limited sea mammal harvest and subsistence halibut (and some other non-salmon species) fishing can take place in Cook Inlet. Alaska Natives can hunt

marine mammals under the MMPA. Traditionally, beluga whales have been one of the most important marine mammal subsistence resources taken from Cook Inlet at Tyonek. However, this population has experienced a sharp decline and is now endangered. Under current co-management agreements, subsistence harvesting has been suspended to allow the population to recover (Allen and Angliss 2011). After recovery, belugas would once again be available for the village of Tyonek to hunt. Proposed actions should have negligible effects upon this potential harvest. While belugas occasionally inhabit areas where exploration noise and disturbance could occur, in recent years their use of such areas appears to be low. In summer, belugas tend to be concentrated in the extreme upper inlet outside the planning area.

The drilling of exploratory wells would have minimal impact on fish species (see Section 4.4.7.3.2) and subsistence fishers. The estimated volume of drilling discharges from exploration wells would have no effect on fish other than bottom dwellers in the immediate area (within 100 m [328 ft]) of the well at the time of discharge (see Section 4.4.7.1). Drilling muds and cuttings may temporarily limit subsistence fishers to portions of traditional fishing grounds, since the fishers would be required to remain at least 500 m (1,640 ft) away from the drilling platform for safety reasons. Only a very small portion of the available subsistence fishing areas in Cook Inlet would be taken up.

Impacts on marine and coastal birds from exploration activities would be limited to the effects of helicopter flights on nesting or roosting individuals directly or in close proximity to regular flight paths. Effects could include abandonment of roosting or foraging areas, nest abandonment, and lower reproductive success. These effects could last from 1 to 2 years if birds adapt and for the life of the project if they fail to do so (MMS 2003a). Cook Inlet is an important seabird breeding area. All Alaska Native communities surrounding the Cook Inlet Planning Area report the harvesting of seabird eggs and marine and coastal birds including migratory waterfowl (Table 3.14.2-2). This localized, probably temporary displacement of bird populations from traditional subsistence harvest areas would affect subsistence bird and egg harvesters by reducing the availability of the resource and/or requiring harvesters to extend their harvesting range. It is not expected that any resource would become unavailable or that there would be an overall population decrease (MMS 2003a).

Sociocultural effects could result from development and production phases, if the resulting employment were to cause an in-migration into the area that is beyond the capacity of existing sociocultural systems to absorb, or if subsistence harvest patterns were changed. Although new development is likely to create jobs, many of these jobs could be filled from the reservoir of skilled petroleum industry workers in the Cook Inlet area (particularly on the Kenai Peninsula) or filled by others who would commute from outside the area and return home at the end of their shifts or contracted work assignments (MMS 2003a). The effect of job creation on population growth is thus likely to be small. The characteristics of any new population segment are likely to be compatible with the towns and cities in which they choose to reside. It is not likely that they will choose to reside in isolated Native villages, unless they are of Native heritage. Any in-migration should do little to change existing sociocultural patterns.

Because oil and gas industry infrastructure already exists in and around Cook Inlet, new construction would be limited to tying new production wells to the existing system. This could

entail the construction of new offshore platforms, offshore and onshore pipelines, and a new landfall. Increased turbidity from the construction of platforms and pipelines could disturb pelagic fish important to subsistence fishers and commercial fishers alike, and displacing the fish from their preferred habitat and decreasing their catchability by subsistence fishers. However, disturbance or displacement should be short term — limited to the time of construction and a few hours or days thereafter. The drilling structures themselves may result in changes in species distribution as offshore structures attract and protect some species (MMS 2003a). Cuttings and fluids from production wells would be treated and disposed of in the well. Longlines and hand-held trolls used for bottom fishing and gear such as beach and purse seines could snag on submerged pipelines, causing some loss of gear for subsistence fishers.

A small increase in vessel activity to support platforms (up to six additional trips per week) is anticipated. This small increase should not measurably affect subsistence harvesting opportunities, catchability of fish and shellfish resources, or navigation by subsistence fishers.

Noise associated with drilling rig and support vessel traffic, helicopter flights, platform construction and operation, pipeline construction, and vessel traffic to and from drilling platforms could temporarily disturb belugas, particularly in the winter when they are more often in the lower inlet. While the beluga population in the inlet is in decline and the Cook Inlet stock is endangered, routine industry activities have not been found to contribute significantly to this decline (MMS 2003a). The effects of increased routine industry activity on beluga populations are assessed in Section 4.4.7.1.1.

Effects on marine and coastal birds important to subsistence harvesters would result from helicopter flights and would be similar to those described above for exploration activities.

Airborne and underwater noise would be the main sources of disturbance for marine mammals harvested by Native communities. Noise and disturbance would come from flights and vessel traffic to platforms, offshore pipelaying, platform installation, and very local costal habitat modification at the pipeline landfall. There would also be brief displacement of terrestrial mammals harvested by some communities (see Table 3.14.2-2) (e.g., brown bears, moose) on the Kenai Peninsula from helicopter flights and supply vessel traffic between platforms and onshore facilities.

Effects from well abandonment and decommissioning on wildlife important to subsistence harvesters would be similar to those from construction.

4.4.13.2.2 Accidents. The activities associated with the proposed action are susceptible to oil spills and natural gas releases. While developers are required to submit oil spill response plans, the *Exxon Valdez* oil spill has shown that a catastrophic discharge event can overwhelm existing plans and cause damage to resources important to subsistence harvesters, affect fish populations important to commercial fishers, and have sociological impacts in affected communities.

It is assumed that as many as 15 very small oil spills (50 bbl or less), 3 small oil spills between 50 and 1,000 bbl, and 1 large spill greater than 1,000 bbl and one catastrophic discharge event (250,000 bbl) could occur under the Program (see Section 4.4.2). While most small spills are likely to be contained, small spills may have effects on subsistence resources. Because small amounts of oil spread out rapidly over the ocean surface, forming a thin sheen, and tend to break up into small patches and streamers, an oil spill has to be at least several barrels, perhaps as many as 50, before birds important to subsistence hunters would be at risk. A limited number of birds would be lost. Small oil spills are estimated to have minor effects on mammals sought by subsistence hunters, such as harbor seals, other marine mammals, and terrestrial mammals, with perhaps the loss of a few individuals to oiling and some minor, transient, and local contamination. Subsistence harvesters would consider animals from an oiled context to be tainted and would be less likely to harvest them. Recovery from small spills would probably require no more than a year (MMS 2003a).

One large spill (over 1,000 bbl) is assumed here. Effects of a large spill are likely to be greatest in parts of the Cook Inlet Planning Area that are relatively confined, since oil is more likely to reach the shore and affect important intertidal zones that support the young of many fish species as well as shellfish that form a part of the subsistence harvest. Fishes most likely to be affected by large spills include many that are important to subsistence fishers. They include those that migrate extensively, such as the arctic cisco; those with strong ties to the streams where they were spawned, such as the Dolly Varden; and those tied to nearshore environments (see Section 4.4.7.2.3).

As the ongoing experience with the results of the *Exxon Valdez* oil spill and subsequent cleanup efforts has shown, a major oil spill in the waters of southern Alaska can have significant consequences for sociocultural systems (Fall 2009). Such effects could reduce the availability and/or accessibility of subsistence resources. Typically, this would last for a single season or less, but potentially for longer periods. Resources subject to such impacts include those that are most significant for the area — fish and shellfish — as well as marine mammals and, to some extent, terrestrial mammals. Birds and marine plants (seaweed) would also be at-risk resources that are used locally. A pipeline or platform spill in Cook Inlet could affect subsistence activities on the Kenai Peninsula, Kodiak Island, and the Alaska Peninsula. Lesser spills would have more confined and more limited impacts.

A large spill and cleanup effort can have long-lasting social and psychological repercussions. The sociocultural impacts of oil spills are of at least two types. The first is the result of direct effects upon resources that are used in some way by local residents (i.e., subsistence, tourism, recreation, and elements of quality of life). This includes economic losses for commercial fishers and support businesses.

The second is the impact of spill cleanup efforts in terms of short-term increases in population and economic opportunities, as well as increased demand on community services and increased stress to local communities. In communities based on commercial fishing, the increased demand on community services coincides with a decrease in tax revenues as income from commercial fishing declines. Competition for employment in the cleanup process creates division within communities (Picou et al. 2009).

As is evident from the *Exxon Valdez* event, cleanup efforts can be quite disruptive socially, psychologically, and economically for an extended period of time. While the magnitude of impacts declines rapidly in the first year or two after a large spill, long-term effects continue to be evident. Technological disasters, such as oil spills, have been shown to have more divisive community effects than those of natural disasters (Picou et al. 2009). Such effects can be reduced by the early implementation of coping and mitigation measures (Picou et al. 1999). One important coping measure is the establishment of, and local participation in, an effective spill-response effort that has been formulated into an explicit spill-response plan. Such local programs do have a number of benefits. They provide local employment, a sense of local empowerment, and a means for local resident/oil industry communication. Another coping measure is the establishment of intervention programs such as peer listening programs based on community participation (MMS 2003a; Picou et al. 1999, 2009; Picou 2010).

Oil spills have the potential for significant and long-lasting effects on subsistence-based Native villages and communities. However, Native communities have proven to be flexible and adaptive, mitigating to some extent immediate losses to subsistence harvest resources. Of major concern to Native wild food harvesters relating to oil spills is the contamination of the natural environment. After the *Exxon Valdez* spill, Alaska Natives were fearful that marine and near shore resources had been tainted, placing more trust in traditional environmental knowledge than government agencies. Harvesting of traditional resources dropped off and Alaska Natives relied on stored foods from previous seasons augmented by relief supplies of traditional foods supplied by unaffected villages with whom they had traditional ties and exchange relationships. Nonetheless, over time, social ties appear to have weakened. In the years following the spill, harvesting slowly rebounded, but the composition of the harvest changed, attributed both to long-term loss of resources and continuing fears of tainting (Fall 2009). Nanwalek Native Tom Evans reported in 2003 that "our resources have not recovered" (MMS 2003c). Other sociocultural effects included changes in wild food preferences, changes in traditional roles and status in the communities, disruption of the instruction of children in traditional subsistence knowledge and practices and thus the disruption of the transmission of Native culture, and conflicts with outsiders (MMS 2003a).

Cleanup efforts would also affect subsistence resources. While cleanup strategies would reduce the amount of spilled oil in the environment, thus mitigating negative effects to some extent, disturbance and displacement of subsistence resources would increase from cleanup activities such as offshore skimmers, workboats, barges, aircraft overflights, and *in situ* burning. Deflection of resources resulting from the combination of a large oil spill and cleanup efforts could persist beyond one season, perhaps lasting several years. The result could be a major effect on subsistence harvests and subsistence users, who would suffer nutritional and cultural impacts (MMS 2003a). In addition to effects on subsistence, during the *Exxon Valdez* cleanup, culturally important archaeological resources were damaged or stolen (Picou et al. 2009).

If a natural gas loss of well control occurred, with possible explosion and fire, subsistence resources such as fish, birds, and beluga whales in the immediate vicinity of the loss of well control could be killed, if the loss of well control occurred below or on the water surface. Natural gas and gas condensates that did not burn would be hazardous to any organism exposed to high natural gas and gas condensate concentrations. Natural gas vapors and condensates

disperse rapidly and would not affect subsistence resources beyond the immediate area. High concentrations would not occur if the loss of well control occurred on the top of a platform where they would disperse more rapidly. Effects from losses of well control are likely to be short term and local, lasting a year or less and extending for about 1.6 km (1 mi) (MMS 2003a).

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges from 75 to 125 thousand bbl (Table 4.4.2-2). It is likely that a CDE would cause significant damage to resources important to subsistence harvesters, affect fish populations important to commercial fishers, and have sociological impacts in affected communities. Alaska Native subsistence harvesters would consider marine mammals from an oiled context to be tainted and would be less likely to harvest them. Since the waters of the Cook Inlet Planning Area are relatively confined, oil from a catastrophic discharge is likely to reach the shore and affect important intertidal zones that support the young of many fish species as well as shellfish that form a part of the subsistence harvest. Fishes most likely to be affected by large spills include many that are important to subsistence fishers. They include those that migrate extensively, such as the arctic cisco; those with strong ties to the streams where they were spawned, such as the Dolly Varden; and those tied to nearshore environments.

A CDE in the waters of south central Alaska and the resulting cleanup are likely to have significant consequences for sociocultural systems and can have long-lasting social and psychological repercussions. The sociocultural impacts would include effects upon resources that are used in some way by local residents (i.e., subsistence, tourism, recreation, and elements of quality of life), and economic losses for commercial fishers and support businesses. In past catastrophic discharge events, the loss of livelihood for both commercial and subsistence fishers can result in depression and an increase in suicide and other pathological behavior, as can participation in protracted litigation resulting from the spill (Picou et al. 2009, Fall et al. 2009).

Cleanup efforts resulting from a CDE would result in short-term increases in population and economic opportunities, as well as increased demand on community services and increased stress to smaller local communities. In communities based on commercial fishing, the increased demand on community services coincides with a decrease in tax revenues as income from commercial fishing declines. Competition for employment in the cleanup process creates division within communities (Picou et al. 2009).

Disturbance and displacement of subsistence resources would increase from cleanup activities such as offshore skimmers, workboats, barges, aircraft overflights, and *in situ* burning. Deflection of resources resulting from the combination of a large oil spill and cleanup efforts could persist beyond one season, perhaps lasting several years. The result could be a major effect on subsistence harvests and subsistence users, who would suffer nutritional and cultural impacts (MMS 2003a).

4.4.13.3 Alaska – Arctic

As was the case for Cook Inlet, finding and developing oil and gas resources on the arctic OCS has the potential for creating adverse effects on sociocultural systems and subsistence.

Such effects would range from minor to major depending on the timing, location, and scale of the activity. Many negative consequences could be minimized through appropriate mitigation procedures. The most central of these would be establishing and maintaining communication among Native villages, oil companies, and appropriate Federal agencies, including both government-to-government consultation in compliance with legal requirements and USDOI policy (USDOI 2001) and ongoing dialogue leading to adaptive management of adverse effects.

As discussed in Section 3.14.3.1, the northern and northwestern coasts of Alaska are the home of indigenous Iñupiat communities confronted with increasing industrialization tied to mineral extraction. While it is clear that industrialization in northern Alaska has had significant economic and social effects, until now, the industrial workforce building and operating the expanding oil and gas extraction facilities has been largely non-local and transient, residing in self-sufficient enclaves far removed from Native villages and, for the most part, placing little strain on village government resources. However, as expressed by Alaska Natives in scoping meetings (BOEMRE 2011c–f), as oil and gas production infrastructure expands both onshore and into the Arctic Ocean, the indigenous villagers feel their traditional subsistence-based lifeway is being constrained and their cultural values threatened.

As expressed by Carla Sims Kayotuk in the 2011 Kaktovik scoping meetings: "I do not want to see that [sociocultural] change for our community. It has changed some, but I don't want to see any more negative changes happen. And I strongly believe that if offshore development, even onshore development [continues], that's going to happen and our community will never be the same again. And I know change happens. Culture changes, traditions change, but I think it's going to be a very negative impact on us" (BOEMRE 2011c).

The Iñupiat are closely tied to the land and the sea. Subsistence harvesting and the distribution of the subsistence harvest through kin and social networks based on cultural ideals of community and sharing are core values of Iñupiat culture. To the extent that oil and gas activities in or close to Native villages adversely affect the subsistence harvest or limit cultural continuity, they have a negative impact on Iñupiat sociocultural systems. In addition, new development may result in an influx of outsiders who do not share Iñupiat values and mores, resulting in stress on indigenous sociocultural systems. For example, all Iñupiat villages on the North Slope are "dry," and in some of them the importation of alcohol is illegal. These values may not be shared by oil workers coming from outside Iñupiat communities.

The Iñupiat harvest a wide range of wild animal and plant resources including bowhead and beluga whales, seals, walrus, polar bears, fish, waterfowl, and caribou (see Section 3.14.3.1). For coastal communities, the most iconic harvests are the bowhead and beluga whale hunts. These lie at the heart of Iñupiat social system and sense of cultural identity.

"If you ever see this young kid as a young man [become] a whaler, it's like an individual that lives in [the city], has a dream of becoming a pilot or [having] a career of some sort. But when you are a Native, it's always been being a provider to the community, be a hunter. That's the culture of Iñupiat. Pass on the traditions that's been passed on to us for thousands of years," said Isaac Nukapigak from the village of Nuiqsut (BOEMRE 2011d).

Native Alaskans often refer to the Chukchi and Beaufort Seas as the Iñupiat garden or Garden of Eden and are extremely concerned about loss of resources from oil spills and pollution, and from changes in patterns of wildlife migration resulting from industrial activities. In the words of Raymond Aguvluk, a local resident, at the 2011 Wainwright scoping meeting for this PEIS "We eat from out there, you know. And [are] you guys going to send us chicken or steak? No way. We love our garden out there" (BOEMRE 2011e)

Marine mammals and fish are the resources of most concern, as they constitute a major part of the subsistence harvest and typically are the resources most likely to be directly affected by oil and gas activities on the OCS. Land mammals, particularly caribou, are also important subsistence resources, but would be affected more by transportation pipelines and other support infrastructure tied to OCS development than directly by oil and gas activities on the OCS. Oil spills that have occurred elsewhere in Alaska have resulted in negative consequences for subsistence resources and activities, but routine exploration, development, and operation could also potentially result in negative effects.

4.4.13.3.1 Routine Operations. Routine oil and gas operations may be divided into four categories or phases: exploration, development, operations, and decommissioning. Exploration on the OCS, whether using seismic surveys or test wells, is done from largely self-contained ocean-going vessels, and in the past has had little direct impact on the infrastructure of local communities (MMS 2007a, 2008b). Exploration ships do require onshore support facilities. Exploration in the Beaufort Sea using existing facilities at Prudhoe Bay/Deadhorse and Barrow would result in little new impact. Conversely, exploration plans filed for the Chukchi Sea include development of an onshore base in Wainwright that would use some village infrastructure and services. With a staff of 22 to 64 individuals, it would include a helipad, fuel storage, lift and hoist facilities near existing boat ramps, and temporary housing for vessel crews weathered in while being changed (Shell 2009a,b). The local village corporation has built is crew quarters (Burwell 2011; Anchorage Daily News 2010). Having the shore base in the village would likely increase interaction between transient workers and Wainwright Native Alaskans, with the potential for changing cultural dynamics, including conflicts arising from differing behavioral norms and the adoption of Western cultural traits by indigenous communities. The presence of the onshore base would also provide some employment opportunities for Native Alaskans (Shell 2009b). Cultural conflicts may be minimized through cultural awareness orientation stipulated in lease contracts so in-migrant workers are made aware of Native Alaskan cultural values including the importance of the subsistence harvest to local communities. Lease stipulations would require developers to submit plans that orient new in-migrant workers to the local Alaska Native culture, including subsistence, in advance (MMS 2007a).

Of great concern to local populations is the noise created by seismic survey air guns and test drilling rigs during exploration and their potential for disturbing or driving away the migratory sea mammals upon which subsistence communities depend. Iñupiat whalers generally agree that whales and other marine mammals are more sensitive to noise than Western scientific studies suggest and will avoid noise sources, and that they have been disturbed from their normal patterns of behavior by past seismic and drilling activities. According to Kaktovik whaling

captain George Kaleak, Sr., "The sound can go over 50 miles, and whales can hear it" (BOEMRE 2011c). Noise and other associated activities can make whales less predictable and more dangerous to those who hunt them. They can be deflected from their usual migration routes into deeper, more dangerous waters, where they are more difficult to take and bring home successfully. Whalers from Barrow, Nuiqsut, and Kaktovik have been especially vocal on this issue, as they are most likely to be directly affected by such activities during the fall open water season.

Isaac Nukapigak, a Nuiqsut whaling captain explained at scoping meetings held in 2011: "At one point, I remember us being out there for 7 weeks and didn't meet our quota because of [oil and gas exploration] activities and weather prediction where our subsistence hunt and the whales were disrupted because of this heavy activity going on in the Beaufort. We had to go 30 miles north. That's where we finally were able to see whales because there was so much activity east of Cross Island. And that time we had no choice because a whale was got 35 miles north of Cross Island because of … safety [in] these small boats that we go out in to harvest, weather prediction got bad on us. We had no choice but to let go of the whale even though we didn't want to. And that year was so harsh because we didn't meet our quota. It was very noticeable in this community. There was no whale meat stored in our cellars. People were hurting" (BOEMRE 2011d).

According to Tom Albert, a former non-Iñupiat senior scientist for the North Slope Borough (NSB) Department of Wildlife Management, "When a captain came in to talk to me, I knew he was going to say that the whales are displaced [by noise] farther than you scientists think they are. But some of them would also talk about 'spookiness,' when the whales were displaced out there and when the whaler would get near them, they were harder to approach and harder to catch" (MMS 1997a).

That marine mammals are sensitive to noise disturbance is clear, although thresholds in terms of signal characteristics and distance for each species have not been established. Generally, such effects would be confined to the vicinity of the seismic vessel and to the actual time of operation. Seismic surveys would occur after July 1 in the open water season, and would thus not affect the spring whale hunt. Deferral of leasing from a corridor along the coast provides a sea mammal migration corridor in the Chukchi Sea. Villagers along the Beaufort coast have requested a similar deferral corridor (BOEMRE 2011d,f). Without mitigation in place, seismic surveys could affect the more important fall hunt and cause subsistence resources to be unavailable and have a major effect on subsistence harvesting. Lease stipulations for whaler-oil industry conflict avoidance agreements (CAAs) and other "non-disturbance" agreements have minimized such problems in the recent past so that noise and disturbance effects of single actions have been, and are expected to be, effectively mitigated. However, such agreements become more difficult to implement if multiple vessels are surveying at the same time. It is expected that required adaptive mitigation and management plans (AMMPs), the requirements of National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS) incidental take authorizations, and required consultation with local communities would ensure that impacts on marine mammals would be minimal. Typical requirements include monitoring for the presence of sea mammals and ensuring that supply aircraft routinely fly above elevations that would disturb sea mammals (MMS 2007a, 2008b).

Development would involve the construction of onshore and offshore infrastructure including gravel drilling pads, onshore and offshore pipelines, landfalls, pumping stations, roads, and additional facilities to house an influx of construction workers. While construction has the potential of providing additional local employment, the noise and human presence associated with construction activities are likely to have temporary and localized effects on some subsistence resources and, depending on the location of construction worker enclaves, place stress on the infrastructure of local communities. Operation of the facilities may require fewer workers than construction, many of whom are likely to be transient shift-workers based in other parts of Alaska. The sociocultural impact of these transient workers would depend on the location of new shore-based facilities, and associated enclaves. With a shore-based facility for Chukchi Sea exploration and development is established at Wainwright, it is likely to expand beyond that required for exploration, further increasing the interaction between transient workers and the previously relatively isolated Alaska Native population.

The potential direct and indirect effects of development in the Arctic would result from noise, visual, and traffic disturbances from the construction of pipelines and other offshore and shore-based facilities. Construction activities, including the delivery of fuel and supplies, are limited in time and space and can be scheduled to minimize impacts to subsistence resources. In the past, they have been effectively limited in specified areas during critical periods on subsistence use through industry/subsistence user cooperation (MMS 2008b). The need to install additional platforms in the Arctic could increase the areas and times where either industry or subsistence activities are restricted. This would increase the possibility for significant harvest disruption. Disruption would be made worse if construction and production activities were concentrated in critical subsistence-use areas, which may include cabins and camps. Potential cumulative effects of multiple projects are discussed in Section 4.6.5.3.

Onshore pipeline effects on subsistence would occur during the 1- or 2-year construction period. The major onshore pipeline to be constructed for the proposed action would connect Chukchi Sea oil production with the TAPS or to a possible deepwater port at Kotzebue. Offshore pipeline effects on subsistence would generally be confined to the period of construction and could be mitigated through lease stipulations that would restrict industry activities during critical subsistence-use periods.

The potential disturbance effects of production operations may be more difficult to mitigate, because such activities would be longer term and operate year round. As with construction, the potential direct and indirect effects of routine OCS operations in the Arctic regions derive from noise, visual, and traffic disturbances from the operation of pipelines and other shore-based facilities.

Even when construction is complete, new infrastructure such as roads and pipelines could serve to restrict the movement of land mammals and the access by indigenous populations to onshore subsistence resources such as caribou herds. For example, a pipeline connecting the Chukchi Sea Planning Area with the TAPS would cross a large area that is currently undeveloped except for isolated and relatively small airstrips. This could restrict access by Nuiqsut subsistence hunters, who already could be restricted by oil and gas development in the Coleville River delta the westward expansion of the Prudhoe Bay facilities, and the potential for

development to their west in the National Petroleum Reserve in Alaska (BOEMRE 2011d). The potential impact of the pipeline on subsistence resource-use patterns, while unavoidable, can be at least partially mitigated and minimized with proper pipeline design, location, and routing. Potential effects of a pipeline on subsistence users (perceptions of areas they wish to avoid or that are difficult for them to access for hunting) can be addressed with design considerations (for instance, by elevating or burying segments of the pipeline) and by including subsistence users early in the consultation process. The most difficult potential onshore pipeline effects to mitigate would be those related to pipeline servicing and access. If a service road is constructed for this purpose, it would greatly increase impacts on caribou movement and access to subsistence resources on the western part of the North Slope (MMS 2007a). This effect would be greater if such a road were eventually opened to public access, on the model of the Dalton Highway. Roads are also reported to impose substantial maintenance costs on subsistence equipment (snow machines and sleds) and to present some safety issues (Impact Assessment, Inc. 1990). Current practices aim to minimize the construction of new roads. If pipeline servicing was conducted using aircraft, and perhaps ice roads or other ground transport in winter, such potential access effects would be minimized. Increased aircraft traffic in the summer could have a moderate effect on subsistence uses, but such impacts could be reduced through coordination with subsistence users.

The potential effect of pipelines on subsistence resources themselves (in terms of population and behavior) are discussed in Section 4.4.7.13. With regard to caribou, onshore facilities and activities associated with the proposed offshore development program in northern Alaska should have temporary impacts on individual caribou but negligible effects on caribou herds, although development may change their migration patterns and make them less accessible or less desirable. Caribou habituation to gravel pads and oil field infrastructure alters the value of the caribou to subsistence users, who view these habituated caribou as contaminated and not behaving correctly. Frank Long, Jr., stated in the Nuiqsut Alpine Satellite Development Project scoping meeting: "We will have the same problem we did in the Prudhoe Bay and the Kuparuk area with our caribou. Right now, I call our caribou that are existing around here that don't go nowhere our 'industrial dope addict caribou.' They are already sick and nobody's doing anything about them" (MMS 2007a).

Fish are another important subsistence resource. Most petroleum industry activities would occur far from the freshwater or nearshore locations where subsistence harvests are concentrated. However, the construction of gravel causeways has the potential to affect fish migration routes. This can be mitigated by including culverts that allow the fish to pass through. Other effects would include potential reductions in fish populations (or health effects), which have been evaluated in Section 4.4.7.3.3.

Many Iñupiat villagers take the long view of their presence on the North Slope. The Iñupiat lived as subsistence hunters for centuries before the arrival of oil development and expect to remain after the oil and gas reserves have been depleted. They are concerned with decommissioning. The impacts of decommissioning are expected to be similar to those of the construction process. Likewise short-lived and spatially restricted, impacts of noise and traffic on subsistence resources can be mitigated through consultation and scheduling.

The principal sociocultural systems impacts of the proposed action in the Arctic would be due to developing a Shore Base within an Alaska Native community. Additional significant effects would be in the area of subsistence harvesting, with implications for health, population, and the economy. All of these topics, except for health, are discussed in other sections (see Sections 4.4.9, 4.4.10, and 4.4.14). Potential OCS activity would support these established trends. Activity under the proposed program could exert sociocultural effects at the Statewide, regional, and local levels. Income related to OCS development could be expected to support many of the preexisting State programs. At a regional level, OCS activity would constitute one component of continued economic development — primarily onshore and related to the Prudhoe Bay "oil patch" — which has become the prime source of support for most of the infrastructure and local economic development. At a local level, communities might experience adverse sociocultural impacts if development leads to the establishment of shore based facilities, new onshore access routes into the communities, an influx of oil industry personnel into local communities, or local economic benefits from increased local employment opportunities.

Social systems and cultures are seldom, if ever, static. Many changes viewed as sociocultural concerns could also be seen as adaptive change. What is often perceived as the "erosion of cultural values" may only be a transformation or change in the behavioral expression of those values (modes of sharing, expressions of respect). On the other hand, some behavioral changes are more important indicators of cultural and value change than others. That is perhaps why public testimony on the impacts of petroleum development in Arctic Alaska — especially that of Native Elders — has focused on subsistence resources and practices, the relationship of people to the land and its resources, health, increased social pathologies, and the use (and loss) of Native languages. While OCS activity from the proposed action would only contribute incrementally to these effects, it should be recognized that these activities would occur within this context.

Some of the vectors of sociocultural change that have been commonly noted in studies of Arctic Alaska, lease sale documents, or testimony during the lease sale process can be briefly summarized as follows (see MMS 2008b, p. 4-327, and reference therein):

- Changes in community and family organization (availability of wage-labor opportunities locally or regionally, ethnic composition, factionalism, household size);

- Institutional dislocation and continuity (introduction of new institutions, "loss" or de-emphasis of older or more traditional ones, and adaptation of new forms to old content or values, and vice versa);

- Changes in the patterns of overall subsistence activities (time allocation, access, effort, equipment, and monetary needs) and the potential disruption of subsistence harvest activities by industrial development;

- Changes in health measures (a combination of increased access to health care, changes in diet, increased exposure to disease, substance use and abuse,

concern over possible exposure to contaminants of various sorts, and other factors);

- Perceived erosion of cultural values and accompanying behaviors (increased social pathologies such as substance abuse, suicide, and crime/delinquency in general; decreased fluency in Native languages; decreased respect for elders; less sharing); and

- Cultural "revitalization" efforts such as dance groups, Native language programs, and official and regular traditional celebrations (such as the reestablishment of *Kivgiq* [the Messenger Feast], for example, in the NSB and the NWAB).

While these are all in some sense generalizations and "analytical constructs," all are also supported by specific testimony of Native residents of the region. These dynamics are not generally viewed as specific to oil and gas development (let alone OCS), but rather as the overall context within which Iñupiat culture must continue to exist (MMS 2008b).

4.4.13.3.2 Accidents. The high degree of dependence of Arctic Native communities on the Beaufort and Chukchi Seas for their subsistence is reflected in the frequency and urgency with which they expressed their concerns over oil spills in the Arctic at public meetings. They are aware of the long-lasting consequences of the *Exxon Valdez* oil spill and of the scale of the effort that was required to cap and clean up after the DWH event in the GOM.

Oil spills have the most potential for adverse effects attributable to the proposed action. Negative effects on specific subsistence species, as well as on the more general patterns of subsistence resource use, persisted in Prince William Sound for years after the *Exxon Valdez* oil spill and the subsequent cleanup effort (Fall 2009).

The impacts of both large and small oil spills are expected to be significant in the Arctic, where oil is more likely to persist in the environment due to colder temperatures. An oil spill of more than 1,000 bbl could, depending on the time and location of the spill event, affect the subsistence use of marine mammals in the region where it occurs. In 1978, Thomas P. Bower, Sr., a whaler from Barrow, reported the results of a 1944 oil spill when a Liberty Ship, the *S.S. Jonathan Harrington*, ran aground southeast of Barrow and dumped fuel oil into the sea to lighten the ship:

According to Bower, about 25,000 gallons of oil were deliberately spilled into the Beaufort Sea in this operation. In the cold, arctic water, the oil formed a mass several inches thick on top of the water. Both sides of the barrier islands in that area — the Plover Islands — became covered with oil. "That first year … I observed how seals and birds who swam in the water would be blinded and suffocated by contact with the oil. It took approximately 4 years for the oil to finally disappear.… I observed that for 4 years after that oil spill, the whales made a wide detour out to sea from these islands" (MMS 2007a).

Although this episode shows that a species can recover after 4 years without cleanup, those years are remembered by subsistence harvesters as a time when subsistence harvest was severely reduced.

It is assumed that as many as 190 very small oil spills (50 bbl or less) and between 35 and 70 small oil spills (more than 50 bbl but no greater than 1,000 bbl) would be associated with the Program in the Arctic (see Section 4.4.2). While most small spills are likely to be contained, small spills may have effects on subsistence resources. Because small amounts of oil spread out rapidly over the ocean surface, forming a thin sheen, and tend to break up into small patches and streamers, an oil spill has to be at least several barrels, perhaps as many as 50, before birds important to subsistence hunters would be at risk. A limited number of birds would be lost. Small oil spills are estimated to have minor effects on mammals sought by subsistence hunters, such as harbor seals, other marine mammals, and terrestrial mammals, with perhaps the loss of a few individuals to oiling and some minor, transient, and local contamination. Subsistence harvesters would consider animals from an oiled context to be tainted and would be less likely to harvest them. Recovery from small spills would probably require no more than a year (MMS 2003a). The effects of prolonged exposure to elevated levels of petroleum hydrocarbons on fish are discussed in Section 4.4.7.3.3. The effects can be lethal or sublethal and have the greatest effect on eggs, larvae, and juveniles, particularly in intertidal zones.

As many as three large spills (over 1,000 bbl) could occur in the Beaufort Sea and Chukchi Sea Planning Areas under the proposed action. As the result of a large spill, the bowhead whale hunt could be disrupted, as could the beluga harvest and the more general and longer hunt for walrus west of Barrow. Animals could be directly oiled, or oil could contaminate the ice floes or onshore haulouts they use on their northern migration. Such animals could be more difficult to hunt because of the physical conditions. Animals could be “spooked” and/or wary, either because of the spill itself or because of the “hazing” of marine mammals, which is a standard spill-response technique in order to encourage them to leave the area affected by a spill. Oiled animals are likely to be considered tainted by subsistence hunters and would not be harvested, as occurred after the *Exxon Valdez* spill. This would also apply to terrestrial animals, such as bears that scavenge oiled birds and animals along the shore, or caribous that seasonally spend time along the shore or on barrier islands seeking relief from insects.

Although developers must submit oil spill response plans and have spill response vessels available, there has been little experience with under-ice or broken-ice oil spills. While the concern is most typically phrased in terms of the potential effects of oil spills on whales and whaling, it can be generalized to a concern for marine mammals and ocean resources in general. Fishes most likely to be affected by large spills include many that are important to subsistence fishers. They include those that migrate extensively, such as the arctic cisco; those with strong ties to the streams where they were spawned, such as the Dolly Varden; and those tied to nearshore environments, such as broad whitefish (see Section 4.4.7.3.3). Marine mammals and fish typically comprise 60% of a coastal community’s diet. Pipeline and platform spills could also impact migrating anadromous fish in the river deltas, as well as species that use oiled coastal and nearshore habitat, such as nesting birds, breeding caribou, and the like. Overall, the impacts of oil spills on subsistence practices and resources are variable, ranging from minor to major, depending on the size, location, and timing of the spill. As shown by the results of the *Exxon*

Valdez spill, subsistence harvesters in unaffected areas are likely to share resources with impacted villages through established social networks. While local ties are regularly strengthened through mutual exchange, they can weaken when there is less to exchange (Picou et al. 2009).

Cleaning up a major spill is likely to have negative consequences as well. Cleanup activities and increased human presence could displace subsistence species from their usual harvesting locations. There are relatively few vessels on the northern coast that could participate in the cleanup of a major spill. It is likely that whaling boats and their crews would be diverted for this purpose. Depending on the timing of the spill, this would make them unavailable for the whale hunt. While local villagers would be employed in the cleanup, it is likely that many additional workers would be necessary, placing stress on village facilities. An influx of outsiders is likely to result in some cultural conflict, stressing the local sociocultural systems.

As is evident from the *Exxon Valdez* oil spill event, such cleanup efforts can be disruptive socially, psychologically, and economically for an extended period of time. While the magnitude of impacts declines rapidly in the first year or two after a large spill, long-term effects continue to be evident (Picou et al. 2009). Such effects can be reduced by the early implementation of coping and mitigation measures (Picou et al. 1999). One important coping measure is the establishment of, and local participation in, an effective spill-response effort that has been formulated into an explicit spill-response plan. Such local programs do have a number of benefits. They provide local employment, a sense of local empowerment, and a means for local resident–oil industry communication. Another possible coping measure would be the establishment of intervention programs, such as peer listening programs based on community participation (MMS 2003a; Picou et al. 1999, 2009; Picou 2010).

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges in size from 1.4 to 2.2 million bbl in the Chukchi Sea Planning Area, and for 1.7 to 3.9 million bbl in the Beaufort Sea Planning Area (Table 4.4.2-2). Local Alaska Natives have grave concerns over the possibility of a CDE. They are concerned that oil from such an event would spread quickly in the shallow Arctic waters, that oil companies lack the technology to clean up a spill in ice and lack an understanding of how dispersants would act in Arctic waters, and that there is not enough equipment nearby and insufficient infrastructure such as harbors and airports to handle a major spill. They are particularly concerned about the effects of a spill in the whale migration path and the resulting loss and/or contamination of a major food source. In the words of Waska Williams at the 2011 Barrow scoping meetings, “In the event that a major spill happens, our way of life is in jeopardy” (BOEMRE 2011f).

Depending on the time and place it occurred, a CDE could have significant effects on the marine mammals, fishes, migratory birds, and terrestrial mammals upon which Alaska Native subsistence harvesters depend. Oil is more likely to persist in the Arctic environment due to the colder temperatures prolonging the effects of such an event. As the result of a catastrophic discharge event, the economically, socially, and culturally important bowhead whale hunt could be disrupted, as could the beluga harvest and the more general and longer hunt for walrus west of Barrow. Animals could be directly oiled, or oil could contaminate the ice floes or onshore haulouts they use on their northern migration. Such animals could be more difficult to hunt

because of the physical conditions. Animals could be "spooked" and/or wary, either because of the spill itself or because of the "hazing" of marine mammals, which is a standard spill-response technique in order to encourage them to leave the area affected by a spill. Oiled animals are likely to be considered tainted by subsistence hunters and would not be harvested, as occurred after the *Exxon Valdez* spill. This would also apply to terrestrial animals, such as bears that scavenge oiled birds and animals along the shore, or caribous that seasonally spend time along the shore or on barrier islands seeking relief from insects. The loss of subsistence harvest resources, particularly marine mammals, would have significant effects on Alaska native culture and society. As shown by the results of the *Exxon Valdez* spill (Picou et al. 2009), subsistence harvesters in unaffected areas are likely to share resources with impacted villages through established social networks. While local ties are regularly strengthened through mutual exchange, they can weaken when there is less to exchange.

Cleaning up a CDE would have negative consequences as well. Cleanup activities and increased human presence could displace subsistence species from their usual harvesting locations. There are relatively few vessels on the northern coast that could participate in the cleanup of a major spill. It is likely that whaling boats and their crews would be diverted for this purpose. Depending on the timing of the spill, this would make them unavailable for the whale hunt. While local villagers would be employed in the cleanup, it is likely that many additional workers would be necessary, placing stress on village facilities. An influx of outsiders is likely to result in some cultural conflict, stressing the local sociocultural systems. As is evident from the *Exxon Valdez* oil spill event, such cleanup efforts can be disruptive socially, psychologically, and economically for an extended period of time.

4.4.13.4 Conclusion

4.4.13.4.1 Gulf of Mexico. Few impacts on GOM sociocultural systems are anticipated from the proposed action. The oil and gas industry is well developed along the coast, and the proposed action is more likely to support the existing industry than to create industry growth. Any expansion of deepwater activities will result in jobs that require longer, unbroken periods of work offshore, specialized skills, and potential in-migration of part of the workforce. Such changes can affect workers, their families, and the communities in which they reside. Impacts to sociocultural systems from routine Program activities in the GOM planning areas are expected to be minor.

Impacts from small spills are likely to have small, localized, and short-lived effects. In the unlikely event of a CDE, there will be economic repercussions for the oil and gas industry, commercial fishers, and subsistence harvesters. These could result in social and cultural stress, leading to possible social pathologies.

4.4.13.4.2 Cook Inlet. Oil and gas exploration, development, and production activities are a continuation of long-time economic characteristics of the area. The proposed action would not introduce new kinds of activities to the area that would alter existing socioeconomic systems.

The relatively small number of new residents that would come into the area because of the proposed action should likewise not alter existing sociocultural systems. These activities are not likely to affect commercial fishing (see Section 4.4.11.2); however, they may periodically result in temporary and localized displacement of subsistence resources or limit subsistence access, making the subsistence harvest by Native Alaskans more difficult, but no resource would experience an overall decrease in population, and no harvest would be curtailed for part of the harvest season. Impacts to sociocultural systems from routine Program activities in the Cook Inlet Planning Area are expected to be minor.

A large oil spill could contact environmental resource areas where important subsistence resources are present. Some harvest areas and resources in these locations would be too contaminated to harvest. Some subsistence resource populations could suffer losses and, as a result of tainting, an even larger array of resources could be rendered unavailable for use. Tainting concerns in communities nearest the spill could seriously curtail traditional practices for harvesting, sharing, and processing resources and threaten pivotal practices of traditional Alaska Native culture. Harvesting, sharing, and processing of subsistence resources would continue but would be hampered to the degree these resources were contaminated. In the case of contamination, harvests would cease until such time as local subsistence hunters perceived resources as safe. In the event of a CDE-level spill, similar impacts would be incurred, although the extent, duration, and magnitude of impacts would be greater. Oil spill cleanup would increase overall effects by displacing subsistence species, altering or reducing subsistence hunter access, and altering or extending the normal period of the subsistence hunt (MMS 2003).

4.4.13.4.3 Arctic. Finding and developing oil and gas resources on the arctic OCS has the potential to create adverse effects on sociocultural systems and subsistence in the Arctic Planning Areas. Such effects would range from minor to major for the routine Program activities, depending on the nature, timing, location, and scale of the activity. Many potential effects are expected to be limited or mitigable. Of greatest concern to the Alaska Natives who inhabit the area are threats to their subsistence base and way of life. Not only does subsistence harvesting provide them with a substantial portion of their food supply, but subsistence-related activities are central to their cultural identity. For many, the most iconic subsistence activity is the whale hunt.

Lease sales on the Arctic OCS are likely to result in the search for and development of oil and gas resources. These activities could have direct and indirect effects on Alaska Native culture. Noise from seismic surveys and exploratory drilling has the potential to deflect whales and other marine mammals from their accustomed migration routes, making them more difficult to harvest. The effects can be reduced through cooperative scheduling and exploration design based on dialogue among the villages, oil companies, and Federal and State agencies. The noise and increased human presence resulting from the construction and operation of drilling pads, pipelines, and shore base facilities has the potential to disturb subsistence species. The increased presence of non-Natives in and around previously isolated villages increases the chance of cross-cultural misunderstanding and could result in financial and cultural stress on Native communities. Lease stipulations requiring conflict avoidance agreements between oil developers and Native villages, along with training of in-migrating work force, will reduce negative impacts.

Impacts on freshwater fish and terrestrial subsistence species such as caribou from onshore pipelines can be ameliorated by cooperative planning efforts that take subsistence needs into account. Effects are likely to be compounded by concern over cumulative effects, which are discussed in Section 4.6.5.3. Of greatest concern to the villagers are the effects of any oil spill. Potential impacts on sociocultural systems from accidents under the proposed action could vary greatly, depending on the size, location, and timing of a spill with greatest impacts occurring with a CDE-level spill. A catastrophic discharge event could prove challenging for existing response capacity and capability, especially if the spill were under ice or in broken ice.

4.4.14 Potential Impacts on Environmental Justice

4.4.14.1 Gulf of Mexico

4.4.14.1.1 Routine Operations. In addition to the continuing use of existing onshore support and processing facilities, between 4 and 6 new pipe yards, up to 12 new pipeline landfalls, and as many as 12 new gas processing facilities are projected to be built as a result of the proposed 5-yr program. Impacts of new onshore construction impacts could include increased noise and traffic, air and water pollution, impacts on residential property values, and land use changes. Air emissions from onshore facilities and helicopter and vessel traffic traversing coastal areas will be highest in the areas containing the greatest amounts of infrastructure, which again will be Texas and Louisiana. Lesser amounts will occur in Mississippi and Alabama. No onshore infrastructure supporting OCS operations currently exists in Florida, and none will be built as a result of the proposed program.

It is assumed that 75% of the activity from the proposed 5-yr program will occur in deep and ultra-deep waters, with offshore air emissions greatest in the coastal areas of Texas and Louisiana, the areas with the greatest amounts of oil and gas activity, and lesser amounts in occurring in Mississippi and Alabama. The coastal areas of Florida are located so far from OCS activities that no environmental justice issues from offshore air emissions are expected to impact the coastal parts of the State.

The effects of the OCS program on air quality have been analyzed in Section 4.4.4. This analysis concluded that routine operations associated with the proposed 5-yr program would result in NO_2, SO_2, PM_{10}, and CO levels that are well within the National Ambient Air Quality Standards (NAAQS). Coastal effects from offshore activities are expected to be small, based on the established and increasing trend toward movement of oil and gas activities into deeper waters of the GOM.

The proposed 5-yr program will result in levels of infrastructure use and construction similar to that which has occurred in the GOM coast region during previous programs. These activities are not expected to expose residents to notably higher risks than currently occur. While the distribution of offshore-related activities and infrastructure indicates that some places and populations in the GOM region will continue to be of environmental justice concern, the

incremental contribution of the proposed OCS program is not expected to affect those places and populations.

4.4.14.1.2 Accidents. Up to 8 large spills greater than 1,000 bbl, between 35 and 70 spills between 50 and 1,000 bbl, and between 200 and 400 small spills less than 50 bbl could occur in the GOM from the proposed action. It is reasonable to expect that most of these spills will occur in deepwater areas located away from the coast, based on the established trend for oil and gas activity to move into deep waters located for the most part at a substantial distance from the coast. However, according to MMS (2002b), the probability of an offshore oil spill occurring and impacting coastal populations is low. While the location of possible oil spills cannot be determined and while low-income and minority populations reside in some areas of the coast, in general the coasts are home to more affluent groups. Low-income and minority groups are not more likely to bear more negative impacts than other groups.

Chemical and drilling-fluid spills may be associated with exploration, production, or transportation activities that result from the proposed action. Low-income and minority populations might be more sensitive to oil spills in coastal waters than is the general population because of their dietary reliance on wild coastal resources, their reliance on these resources for other subsistence purposes such as sharing and bartering, their limited flexibility in substituting wild resources with those purchased, and their likelihood of participating in cleanup efforts and other mitigating activities. With the exception of a catastrophic accidental event, such as that which occurred following the DWH accident, the impacts of oil spills, vessel collisions, and chemical/drilling fluid spills are not likely to be of sufficient duration to have adverse and disproportionate long-term effects for low-income and minority communities in the analysis area.

A CDE could have adverse and disproportionate effects for low-income and minority communities in the analysis area. Many of the long-term impacts of the DWH accident on low-income and minority communities are unknown. While economic impacts have been partially mitigated by employers retaining employees for delayed maintenance or through the Gulf Coast Claims Facility (GCCF) program's emergency funds, the physical and mental health effects on both children and adults within these communities could potentially unfold for many years. As studies of past oil spills have highlighted, different cultural groups can possess varying capacities to cope with these types of events (Palinkas et al. 1992). Likewise, some low-income and/or minority groups may be more reliant on natural resources and/or less equipped to substitute contaminated or inaccessible natural resources with private market offerings. Because lower income and/or minority communities may live near and be directly involved with spill cleanup efforts, the vectors of exposure can be higher for them than for the general population, increasing the potential risks of long-term health effects. To date, there have been no longitudinal epidemiological studies of possible long-term health effects for oil spill cleanup workers.

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges in size from 0.9 to 7.2 million bbl (Table 4.4.2-2). Although the magnitude of impacts of a CDE would partly depend on the location, size, and timing of the event, many of the long-term impacts of a CDE on low-income and minority communities are unknown. A spill as large as that which occurred

following the DWH accident could have adverse and disproportionate effects for low-income and minority communities in coastal and inland areas. Different cultural groups would likely possess varying capacities to cope with catastrophic events, with some low-income and/or minority groups more reliant on subsistence resources and/or less equipped to substitute contaminated or inaccessible subsistence resources with those purchased in the marketplace. Because lower income and/or minority communities may live near and be directly involved with CDE cleanup efforts, the vectors of exposure can be higher for them than for the general population, increasing the potential risks of long-term health effects.

4.4.14.2 Alaska – Cook Inlet

4.4.14.2.1 Routine Operations. Although only one pipeline landfall and no new pipe yards or gas processing facilities would be built as a result of the Program, additional offshore construction could include increased noise and traffic, air and water pollution, impacts on residential property values, and land use changes. Much of the Alaska Native population resides in the coastal areas of Alaska. New offshore infrastructure resulting from this program could be located near areas where subsistence hunting occurs. The Program will result in levels of infrastructure use and construction similar to that which has occurred in the south central Alaska region during previous programs, and, in many of the same locations. These activities are not expected to expose residents to notably higher risks than those that currently occur.

Any adverse environmental impacts on fish and mammal subsistence resources from installation of infrastructure and routine operations of these facilities could have disproportionately higher health or environmental impacts on Alaska Native populations, particularly with regard to air quality impacts and impacts on animal species used for subsistence purposes.

Air emissions from onshore facilities and helicopter and vessel traffic traversing coastal areas will be highest in areas containing the greatest amounts of infrastructure. It is assumed that the majority of the activity from the Program will occur in deep and ultra-deep waters, with offshore air emissions greatest in the coastal areas with the greatest amounts of oil and gas activity, and lesser amounts occurring elsewhere. The effects of the OCS program on air quality have been analyzed in Section 4.4.4. This analysis concluded that routine operations associated with the proposed 5-yr program would result in NO_2, SO_2, PM_{10}, and CO levels that are well within the NAAQS. Coastal effects from offshore activities are expected to be small, based on the established and increasing trend toward movement of oil and gas activities into deeper waters.

Critical subsistence species that are most likely to be disturbed by noise-producing activities include bowhead and beluga whales, seals, fish, caribou, and birds. Noise disturbance would be associated with aircraft and vessel support of modifications to platform facilities, installation of oil and gas pipelines from platforms to shore, and the expansion of shore facilities. While OCS oil and gas activities are not expected to appreciably reduce any populations of subsistence species, it is possible that disturbance caused by these activities could alter the local

availability of these resources to harvesters. These impacts would be considered short term and localized, and would not rise to the level of significant adverse effects.

4.4.14.2.2 Accidents. One large spill greater than 1,000 bbl, between 1 and 3 spills between 50 and 1,000 bbl, and up to 15 small spills less than 50 bbl could occur in the Cook Inlet area from the proposed action. It is reasonable to expect that most of these spills will occur in deepwater areas located away from the coast, based on the established trend for oil and gas activity to move into deep waters located for the most part at a substantial distance from the coast. The magnitude of impacts from such spills cannot be predicted, should they contact the coast, and depends on their location, size, and timing. However, according to MMS (2002b), the probability of an offshore oil spill occurring and impacting coastal populations is low. While the location of possible oil spills cannot be determined and while low-income and minority populations are resident in some areas of the coast, in general the coasts are home to more affluent groups. Low-income and minority groups are not more likely to bear more negative impacts than are other groups.

Subsistence activities of Alaska Native communities could be affected by accidental oil spills, with the potential health effects of oil spill contamination on subsistence foods being the main concern. After the 1989 *Exxon Valdez* spill, testing of subsistence foods for hydrocarbon contamination between 1989 and 1994 revealed very low concentrations of petroleum hydrocarbons in most subsistence foods, and the U.S. Food and Drug Administration concluded that eating food with such low levels of hydrocarbons posed no significant risk to human health (Hom et al. 1999). Human health risks can be reduced through timely warnings about spills, forecasts about which areas may be affected, and even evacuating people and avoiding marine and terrestrial foods that may be affected. Avoidance of shellfish, which accumulate hydrocarbons, would be recommended, and Federal and State agencies with health care responsibilities would have to sample the food sources and test for possible contamination.

Whether subsistence users will use potentially tainted foods would depend on the cultural "confidence" in the purity of these foods. Based on surveys and findings in studies of the *Exxon Valdez* spill, Natives in affected communities largely avoided subsistence foods as long as the oil remained in the environment. Perceptions of food tainting and avoiding use lingered in Native communities after the *Exxon Valdez* spill, even when agency testing maintained that consumption posed no risk to human health (MMS 2006b).

The assessment and communication of the contamination risks of consuming subsistence resources following an oil spill is a continuing challenge to health and natural resource managers. After the *Exxon Valdez* spill, analytical testing and rigorous reporting procedures failed to convince many subsistence consumers because test results were often inconsistent with Native perceptions about environmental health. Any effective discussion of subsistence resource contamination must understand the conflicting scientific paradigms of Western science and traditional knowledge in addition to the vocabulary of the social sciences in reference to observations throughout the collection, evaluation, and reporting processes. True restoration of environmental damage, according to Picou and Gill (1996), "must include the re-establishment of a social equilibrium between the bio-physical environment and the human community"

(Field et al. 1999; Nighswander and Peacock 1999; Fall et al. 1999). Since 1995, subsistence restoration resulting from the *Exxon Valdez* oil spill has improved by taking a more comprehensive approach by partnering with local communities and by linking scientific methodologies with traditional knowledge (Fall et al. 1999; Fall and Utermohle 1999).

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges in size from 75 to 125 thousand bbl (Table 4.4.2-20). Although the magnitude of impacts of a CDE would partly depend on the location, size, and timing of the event, many of the long-term impacts of a CDE on low-income and minority communities are unknown. A spill as large as that which occurred following the DWH accident could have adverse and disproportionate effects for low-income and minority communities in coastal and inland areas. Different cultural groups would likely possess varying capacities to cope with catastrophic events, with some low-income and/or minority groups more reliant on subsistence resources and/or less equipped to substitute contaminated or inaccessible subsistence resources with those purchased in the marketplace. Because lower income and/or minority communities may live near and be directly involved with catastrophic discharge event cleanup efforts, the vectors of exposure can be higher for them than for the general population, increasing the potential risks of long-term health effects.

4.4.14.3 Alaska – Arctic

4.4.14.3.1 Routine Operations. Although only one pipeline landfall and no new pipe yards or gas processing facilities would be built as a result of the Program, additional offshore construction could include increased noise and traffic, air and water pollution, impacts on residential property values, and land use changes. Much of the Alaska Native population resides in the coastal areas of Alaska. Any new onshore and offshore infrastructure resulting from this program could be located near these populations or near areas where subsistence hunting occurs. The Program will result in levels of infrastructure use and construction similar to what has occurred in the Arctic region during previous programs. These activities are not expected to expose residents to notably higher risks than currently occur.

Air emissions from onshore facilities and helicopter and vessel traffic traversing coastal areas will be highest in the areas containing the greatest amount of infrastructure. It is assumed that the majority of the activity from the Program will occur in deep and ultra-deep waters, with offshore air emissions greatest in the coastal areas with the greatest amounts of oil and gas activity, and lesser amounts in occurring elsewhere. The effects of the OCS program on air quality have been analyzed in Section 4.4.4. This analysis concluded that routine operations associated with the Program would result in NO_2, SO_2, PM_{10}, and CO levels that are well within the NAAQS.

Any adverse environmental impacts on fish and mammal subsistence resources from installation of infrastructure and routine operations of these facilities could have disproportionately higher health or environmental impacts on Alaska Native populations, particularly with regard to air quality impacts and impacts on animal species used for subsistence purposes.

The NSB Municipal Code defines subsistence as "an activity performed in support of the basic beliefs and nutritional needs of the residents of the borough and includes hunting, whaling, fishing, trapping, camping, food gathering, and other traditional and cultural activities" (ADNR 1997). While this is, at best, a partial view of the significance of these activities to the Iñupiat (and more generally to Alaskan Natives) as individuals, culturally it stresses subsistence as a primary cultural and nutritional set of activities upon which Alaskan Natives depend.

Critical subsistence species that are most likely to be disturbed by noise-producing activities include bowhead and beluga whales, seals, fish, caribou, and birds. Noise disturbance would be associated with aircraft and vessel support of modifications to platform facilities, installation of oil and gas pipelines from platforms to shore, and the expansion of shore facilities. While natural gas development and production are not expected to appreciably reduce any populations of subsistence species, it is possible that disturbance caused by these activities could alter the local availability of these resources to harvesters. These impacts would be considered short term and localized, and would not rise to the level of significant adverse effects.

4.4.14.3.2 Accidents. Up to 3 large spills greater than 1,000 bbl, between 10 and 35 spills between 50 and 1,000 bbl, and up to 190 small spills of less than 50 bbl could occur in the Beaufort and Chukchi Sea area from the proposed action. The magnitude of impacts from such spills cannot be predicted, should they contact the coast, and depends on their location, size, and timing. However, according to MMS (2002b), the probability of an offshore oil spill occurring and impacting coastal populations is low. While the location of possible oil spills cannot be determined, and while low-income and minority populations are resident in some areas of the coast, low-income and minority groups are not more likely to bear more negative impacts than are other groups.

Subsistence activities of Native communities could be affected by accidental oil spills, with the potential health effects of oil spill contamination of subsistence foods being the main concern. After the 1989 *Exxon Valdez* spill, testing of subsistence foods for hydrocarbon contamination between 1989 and 1994 revealed very low concentrations of petroleum hydrocarbons in most subsistence foods, and the U.S. Food and Drug Administration concluded that eating food with such low levels of hydrocarbons posed no significant risk to human health (Hom et al. 1999). Human health risks can be reduced through timely warnings about spills, forecasts about which areas may be affected, and even evacuating people and avoiding marine and terrestrial foods that may be affected. Avoidance of shellfish, which accumulate hydrocarbons, would be recommended, and Federal and State agencies with health care responsibilities would have to sample the food sources and test for possible contamination.

Whether subsistence users will use potentially tainted foods would depend on the cultural "confidence" in the purity of these foods. Based on surveys and findings in studies of the *Exxon Valdez* spill, Natives in affected communities largely avoided subsistence foods as long as the oil remained in the environment. Perceptions of food tainting and avoiding use lingered in Native communities after the *Exxon Valdez* spill, even when agency testing maintained that consumption posed no risk to human health (MMS 2006b).

The assessment and communication of the contamination risks of consuming subsistence resources following an oil spill is a continuing challenge to health and natural resource managers. After the *Exxon Valdez* spill, analytical testing and rigorous reporting procedures failed to convince many subsistence consumers, because test results were often inconsistent with Native perceptions about environmental health. Any effective discussion of subsistence resource contamination must understand the conflicting scientific paradigms of Western science and traditional knowledge in addition to the vocabulary of the social sciences in reference to observations throughout the collection, evaluation, and reporting processes. True restoration of environmental damage, according to Picou and Gill (1996), "must include the re-establishment of a social equilibrium between the bio-physical environment and the human community" (Field et al. 1999; Nighswander and Peacock 1999; Fall et al. 1999). Since 1995, subsistence restoration resulting from the *Exxon Valdez* oil spill has improved by taking a more comprehensive approach by partnering with local communities and by linking scientific methodologies with traditional knowledge (Fall et al. 1999; Fall and Utermohle 1999).

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges from 1.4 to 2.2 million bbl in the Chukchi Sea Planning Area and from 1.7 to 3.9 million bbl in the Beaufort Sea Planning Area (Table 4.4.2-2). Although the magnitude of impacts of a CDE would partly depend on the location, size, and timing of the event, many of the long-term impacts of a CDE on low-income and minority communities are unknown. A spill as large as that which occurred following the DWH accident could have adverse and disproportionate effects for low-income and minority communities in coastal and inland areas. Different cultural groups would likely possess varying capacities to cope with catastrophic events, with some low-income and/or minority groups more reliant on subsistence resources and/or less equipped to substitute contaminated or inaccessible subsistence resources with those purchased in the marketplace. Because lower income and/or minority communities may live near and be directly involved with catastrophic discharge event cleanup efforts, the vectors of exposure can be higher for them than for the general population, increasing the potential risks of long-term health effects.

4.4.14.4 Conclusion

The Program would result in levels of infrastructure use and construction similar to those that have already occurred along the GOM coast during previous programs. Routine Program operations are not expected to expose residents to notably higher risks than currently occur. While the distribution of offshore Program activities and infrastructure indicates that some places and populations in the GOM region will continue to be of environmental justice concern, the incremental contribution of the Program is not expected to affect those places and populations. Air emissions from the proposed program are not expected to result in air quality impacts on minority or low-income populations, with emissions from the proposed program not being expected to exceed the NAAQS in any affected area. Impacts to environmental justice from routine Program activities in the GOM Planning Areas are expected to be negligible. No environmental justice impacts from accidental oil spills are expected in the GOM because of the movement of oil and gas activities farther away from coastal areas and the demographic pattern of more affluent groups living in coastal areas.

In Alaska, much of the Alaska Native population resides in the coastal areas. Any new onshore and offshore infrastructure occurring under the Program could be located near these populations or near areas where subsistence hunting occurs. Any adverse environmental impacts on fish and mammal subsistence resources from Program infrastructure and routine operations could result in health or environmental justice impacts on Alaska Native populations although impacts are expected to be minor. A large oil spill, and especially a CDE-level spill, that contacts subsistence resources could also have disproportionately high impacts on the Alaska Native population, particularly if the subsistence resources were diminished or tainted as a result of the spill. In the event of a CDE, long-term impacts to subsistence resources may be expected, and these may lead to longer and greater environmental justice impacts. Mitigation measures, cooperative agreements between Native and industry groups, and government-to-government consultations are designed to limit the effects from oil spills and routine operations.

4.4.15 Potential Impacts to Archeological and Historic Resources

4.4.15.1 Gulf of Mexico

Archaeological resources in the GOM region that may be impacted by the proposed action include historic shipwrecks and inundated prehistoric sites offshore as well as historic and prehistoric sites onshore. Historic shipwrecks tend to concentrate in the shallow, nearshore waters of the GOM (CEI 1977; Garrison et al. 1989; Pearson et al. 2003); however, numerous recent discoveries of well-preserved historic shipwrecks in deepwater areas of the GOM have increased understanding of shipwreck potential on the OCS (Atauz et al. 2006; Church and Warren 2008; Church et al. 2004; Ford et al. 2008). BOEM has expanded its archaeological survey requirements to ensure the detection of these deepwater shipwrecks prior to approving bottom-disturbing activities in areas where it has reason to believe that archaeological resources might exist. Inundated prehistoric sites may exist on the continental shelf shoreward of about the 50-m (164-ft) isobath. The depth may increase as our understanding of the timing for the peopling of North America is pushed ever earlier.

Onshore historic properties include sites, structures, and objects such as historic buildings, forts, lighthouses, homesteads, cemeteries, and battlefields. Onshore prehistoric archaeological resources include sites, structures, and objects such as shell middens, earth middens, campsites, kill sites, tool manufacturing areas, ceremonial complexes, and earthworks. Adverse effects on historic properties require mitigation. The appropriate mitigation would be developed through consultation among BOEM, the appropriate SHPO, and any Native American tribes who have an interest in the resources.

All archaeological sites identified through surveys conducted for BOEM permitting activities require avoidance or evaluation for listing on the NRHP. Only archaeological and historic resources that are determined eligible for listing on the NRHP require consideration during Federal undertakings (36 CFR Part 800).

4.4.15.1.1 Routine Operations. Routine operations associated with offshore oil and gas fall into four stages: exploration, development, operations, and decontamination and decommissioning. Impacts can occur on archaeological and historic resources during any stage but would be most likely during the exploration and development stages when the seafloor is first altered by an activity. It is assumed that operations and decontamination and decommissioning would affect seafloor that had been previously altered by the earlier activities. The potential for impacting a cultural resource is dependent upon the specific activity and whether a cultural resource is present within the area of potential effect for that activity.

Routine activities associated with exploration and development that are likely to affect archaeological and historic resources include drilling wells, platform installation, and pipeline installation and anchoring, as well as onshore facility and pipeline construction projects. While the source of potential impacts will vary with the specific location and nature of the routine operation, the goal of archaeological resource management remains the protection and/or retrieval of unique information contained in intact archaeological deposits.

Direct impacts occur when permitted activities physically alter significant archaeological or historic resources. The result of direct impacts on shipwrecks would be the loss of archaeological data on ship construction, cargo, and the social organization of the vessel's crew, as well as loss of information on maritime cultures for the time period from which the ship dates. Other indirect impacts can result from the visual intrusion resulting from oil and gas development on the OCS and its effect on onshore historic properties. An indirect effect of oil and gas development on archaeological and historic resources is that metal debris from a permitted activity could settle near a shipwreck and could mask magnetic signatures of significant historic archaeological resources, making them more difficult to detect with magnetometers. Direct impacts from a routine activity on a prehistoric archaeological site could include destruction of artifacts or site features, as well as disturbance of the stratigraphic context of the site. This would result in the loss of archaeological data on prehistoric migrations, settlement patterns, subsistence strategies, and archaeological contacts for North America, Central America, South America, and the Caribbean.

Regulations in 30 CFR 250.194 allow the BOEM Regional Director to require that an archaeological report based on geophysical data be prepared, if there are indications that a significant archaeological resource may exist within a lease area. For historic resources, this decision can be based on whether a lease block falls within an area assessed as having a high potential for shipwreck occurrence, such as the entrances to historic ports and harbors, or on the Regional Director's determination that a survey is warranted. For prehistoric resources, a survey is required if there is the potential for landforms to be present that could contain prehistoric material. If the survey finds evidence of a possible archaeological resource within the lease area, the lessee must either move the proposed activity to avoid the possible resource or conduct further investigations to determine whether an archaeological resource actually exists at the location. If an archaeological resource is present at the location of proposed activity and cannot be avoided, BOEM procedures require consultation with the State Historic Preservation Office to develop mitigating measures prior to any exploration or development.

BOEM has used predictive models based on various parameters to determine when and where archaeological surveys should be required. Studies conducted between 2006 and 2008 suggest that the models used in the past are not adequate (Church and Warren 2008; Ford et al. 2008; Atauz et al. 2006). These studies document significant effects on shipwrecks resulting from routine activities that occurred in areas where wrecks were not anticipated. As a result of these discoveries, BOEM may require surveys in all areas outside those already identified as having the potential for archaeology that could be affected by a project.

Federal, State, and local laws and ordinances, including the National Historic Preservation Act provide a process to facilitate the consideration of known sites and as-yet-unidentified archaeological resources in the planning phases of a proposed project. Where there is reason to believe that an archaeological resource might exist in a lease area, regulations require archaeological surveys to be conducted prior to permitting any activity that might disturb a significant archaeological site. When required, these archaeological surveys have been found to be effective in locating most archaeological resources prior to any construction on the OCS; however, even with surveys, there is the potential that a shipwreck or an inundated terrestrial site could be missed due to sedimentation on the wreck or other factors, resulting in a routine activity contacting a shipwreck or site. Such an event could result in the disturbance or destruction of unique or significant historic archaeological information.

4.4.15.1.2 Accidents. Impacts on archaeological and historical resources from an accidental oil spill can result from either direct contact of crude oil with archaeological material or from effects caused by cleanup workers and their equipment (i.e., anchor drags, dredging of contaminated soils, or unauthorized collecting by cleanup workers). The following are discussions of the potential effects from an accidental oil spill on various resource types based on location and water depth.

Shipwrecks in shallow waters and coastal historic and prehistoric archeological sites could be impacted by an accidental oil spill. Archaeological resource protection during an oil spill requires specific knowledge of the resource's location, condition, nature, and extent prior to impact; however, the GOM coastline has not been systematically surveyed for archaeological sites. Existing information indicates that, in coastal areas of the GOM, prehistoric sites occur frequently along the barrier islands and mainland coast and the margins of bays and bayous. Thus, any spill that contacted the land would involve a potential impact on a prehistoric site.

Shipwrecks can be affected by contact with crude oil. Shallow water shipwrecks often serve as artificial reefs when they are covered by corals and other organisms. The organisms that attach to the wreck protect the wood from deterioration. An oil spill could destabilize a balanced ecosystem covering the wreck, thus potentially increasing deterioration of the wreck until the wreck comes into equilibrium with its new environment. Some terrestrial studies have suggested that, while oil contamination of wood initially restricts deterioration, it can later increase deterioration (Ejechi 2003). It is not known how this situation would be altered in a marine environment. It is also not known whether dispersants used to break up concentrations of oil have any effect on shipwrecks or the vegetation that forms on the wrecks (BOEMRE 2011a).

Should an oil spill contact a coastal historic site, such as a fort or a lighthouse, the major impact would be visual due to oil contamination of the site and its environment. Any effects from contact with oil to historic materials could be mitigated through cleaning of the historic material. The visual impact would most likely be temporary, lasting up to several weeks depending on the time required for cleanup. Gross crude oil contamination of shorelines is a potential direct impact that may affect archaeological site recognition. Heavy oiling conditions (Whitney 1994) could conceal intertidal sites that may not be recognized until they are inadvertently damaged during cleanup. Crude oil may also contaminate organic material used in ^{14}C dating, and, although there are methods for cleaning contaminated ^{14}C samples, greater expense is incurred (Dekin et al. 1993). An Alaskan study examining the effects of the 1989 *Exxon Valdez* oil spill on archaeological deposits revealed that oil in the intertidal zone had not penetrated the subsoil, apparently due to hydrostatic pressure (Dekin et al. 1993); however, because of the different environments, these results should not be translated into the GOM coastal environment without further study.

Spill Response and Cleanup. Cleanup activities have the potential to alter archaeological sites and shipwrecks. Inadvertent damage from anchors can greatly impact archaeological sites and shipwrecks (Church and Warren 2008). The potential amount of damage depends on several factors including the presence and density of shipwrecks and archaeological material in the area of activity, the number of vessels being employed in the cleanup activities, and whether offshore decontamination stations were needed and where these facilities were established. These types of impacts could be avoided or minimized if wreck locations are known. In 2007, 2,100 shipwrecks were reported to have been lost in the GOM; however, specific location information is known for only 233 of these wrecks (BOEMRE 2011a). This issue makes avoiding wrecks difficult.

Another source of potential impact from oil spills is the harm that could result from unmonitored shoreline cleanup activities. Unmonitored booming, cleanup activities involving vehicle and foot traffic, mechanized cleanup involving heavy equipment, and high-pressure washing on or near archaeological sites pose risks to the resources. Unauthorized collecting of artifacts by cleanup crew members is also a concern, albeit one that can be mitigated with effective training and supervision. As Bittner (1996) described in her summary of the *Exxon Valdez* oil spill, "Damage assessment revealed no contamination of the sites by oil, but considerable damage resulted from vandalism associated with cleanup activities and lesser amounts were caused by the cleanup process itself."

The National Response Team's *Programmatic Agreement on Protection of Historic Properties during Emergency Response under the National Oil and Hazardous Substances Pollution Contingency Plan* clarifies interagency and regulatory aspects of archaeological site protection during oil spill response. The agreement was followed during the DWH event and it is assumed that the agreement was effective; however, no reports on the utility of the agreement for that event are currently available.

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges in size from 0.9 to 7.2 million bbl (Table 4.4.2-2). A CDE could result in extensive impacts on a large number of archaeological and historic resources. Due to the large area affected by a catastrophic

event, some resources such as coastal historic sites that are sensitive to prolonged contact with oil could be more heavily impacted. Cleanup crews would be needed in a greater number of locations. This could allow oil to be in contact with resources for a significant amount of time before cleanup efforts could be applied, which could result in impacts to these resources. A greater threat to archaeological and historic resources during a catastrophic discharge event would result from the larger number of response crews being employed. Historically most impacts to archaeological and historic resources during a spill response were the result of vandalism or physical damage from spill response activities (Bittner 1996). A catastrophic discharge event would result in major impacts to numerous archaeological and historic resources from response activities.

The Programmatic Agreement on Protection of Historic Properties during Emergency Response under the National Oil and Hazardous Substances Pollution Contingency Plan would be followed during the response to a CDE. As mentioned above, it is assumed that the process identified in the agreement would be effective; however, no assessments of the agreement's application during the DWH event are available.

4.4.15.2 Alaska – Cook Inlet

Archaeological and historic resources in the Alaska region include historic shipwrecks, submerged aircraft, inundated prehistoric sites offshore, and historic and prehistoric sites onshore. These resources have the potential to be affected by the proposed action. The locations of most of the cultural resources in Cook Inlet are currently unknown, but if any are discovered during OCS oil and gas activities, they would be subject to archaeological surveys, and other activities and mitigations required by applicable laws and BOEM policies. There is currently no archaeological baseline study for Alaska on which to base decisions concerning where cultural resources should be present. An archaeological baseline study was done for Alaska in the mid-1980s (Dixon et al. 1986); however, this research was never updated and should be assessed for its validity when compared with current research and scientific findings. Some research attempting to identify landforms that may contain archaeological remains has been done in the Beaufort and Chukchi Seas, but no new studies have been conducted in Cook Inlet. Research on historic shipwrecks has identified 108 shipwrecks in Cook Inlet (Tornfelt and Burwell 1992). As discussed in Section 3.16.2, portions of Cook Inlet are subject to high-energy tidal movements (MMS 2003a). This high-energy environment may have destroyed some of the archaeological evidence that once existed in Cook Inlet, but this can only be verified through science-based methods of inquiry.

4.4.15.2.1 Routine Operations. Routine activities associated with the proposed action that could affect cultural resources include well drilling, platform installation, pipeline installation, and onshore facility and pipeline construction projects that involve ground disturbance. Effects on cultural resources can be determined only on a case-by-case basis. Only through project-specific surveys can cultural resources be identified. The determination that a survey is required depends on several factors including the potential for landforms to exist that

may contain archaeological sites (i.e., submerged coastlines) or archival records suggesting that shipwrecks could be present.

As previously discussed, regulations at 30 CFR 250.194 allow the BOEM Regional Director to require that an archaeological report based on geophysical data be prepared, if there are indications that a significant archaeological resource may exist within a lease area. For historic resources, this decision is based on whether a historic shipwreck is reported to exist within or adjacent to a lease area. For prehistoric resources, an analysis is completed prior to each lease sale to consider the relative sea level history, the depth of burial of the late Wisconsinan land surface (i.e., lands that could contain archaeological sites), the type and thickness of sediments burying the old land surface, and the severity of ice gouging at the present seafloor. Lease areas that are shown by this analysis to have the potential for prehistoric archaeological resources are required to have an archaeological survey prior to initiating exploration and development activities. If the survey finds evidence of a possible archaeological resource within the lease area, the lessee must either move the proposed activity to avoid the possible resource or conduct further investigations to determine whether an archaeological resource actually exists at the location. If an archaeological resource is present at the location of proposed activity and cannot be avoided, BOEM procedures require consultation with the State Historic Preservation Office to develop mitigation measures prior to any exploration or development.

Federal, State, and local laws and ordinances, including the National Historic Preservation Act and the Alaska Historic Preservation Act, provide a process to facilitate the consideration of known sites and as-yet-unidentified archaeological resources both onshore and offshore. Where there is reason to believe that an archaeological resource might exist in a lease area, regulations require archaeological surveys to be conducted prior to permitting any activity that might disturb a significant archaeological site. When required, these surveys have been found to be effective in locating most archaeological resources prior to any construction or offshore bottom-disturbing activity on the OCS. However, even with surveys there is the potential that a shipwreck or an inundated terrestrial site could be missed due to sedimentation on the wreck or other factors, resulting in a routine activity contacting a shipwreck or site. Such an event could result in the disturbance or destruction of unique or significant historic archaeological information. However, regulations in 30 CFR 250.194(c) require that if any archaeological resource is discovered, operations must be immediately halted in the area of the discovery and a report of the discovery must be made so that further investigation may determine the significance of the resource.

4.4.15.2.2 Accidents. Oil spills and their subsequent cleanup could impact the archaeological resources of the Alaska region directly and/or indirectly. The geologic history of specific shorelines generally affects the presence or absence, condition, and age of archaeological sites on or near Alaska region shorelines. However, some types of archaeological resources are present on or adjacent to nearly all Alaska region shorelines. Existing data indicate that archaeological resources are particularly abundant along Gulf of Alaska shorelines (Mobley et al. 1990).

Archaeological resource protection during an oil spill requires specific knowledge of the resource's location, condition, nature, and extent prior to impact. However, large portions of the Cook Inlet coastline have not been systematically surveyed for archaeological sites. While some response groups have compiled known archaeological site data in a form useful for mitigation during an emergency response (Wooley et al. 1997), these data have not been compiled for all areas of the Alaska region.

Gross crude oil contamination of shorelines is a potential direct impact that may affect archaeological site recognition. Heavy oiling conditions (Whitney 1994) could conceal intertidal sites that may not be recognized until they are inadvertently damaged during cleanup. Crude oil may also contaminate organic material used in ^{14}C dating, and, although there are methods for cleaning contaminated ^{14}C samples, greater expense is incurred (Dekin et al. 1993). However, many other anthropogenic sources of hydrocarbons and other possible contaminants also exist, so caution should always be taken when analyzing radiocarbon samples from coastal Alaska (see Reger et al. 1992). A study examining the effects of the 1989 *Exxon Valdez* oil spill on archaeological deposits revealed that oil in the intertidal zone had not penetrated the subsoil, apparently due to hydrostatic pressure (Dekin et al. 1993).

Spill Response and Cleanup. The major source of potential impact from oil spills resulting from the proposed action is the harm that could result from unmonitored shoreline cleanup activities. Cleanup activities could impact beached shipwrecks, or shipwrecks in shallow waters, as well as coastal historic and prehistoric archaeological sites. Unmonitored booming, cleanup activities involving vehicle and foot traffic, mechanized cleanup involving heavy equipment, and high-pressure washing on or near archaeological sites pose risks to the resources. Inadvertent damage from anchors can greatly alter archaeological sites and shipwrecks (Church and Warren 2008). The potential amount of damage depends on several factors including the presence and density of shipwrecks and archaeological material in the area of activity, the number of vessels being employed in the cleanup activities, and whether offshore decontamination stations were needed and where these facilities were established. These types of impacts could be avoided or minimized if wreck locations are known. Unauthorized collecting of artifacts by cleanup crew members is also a concern, albeit one that can be mitigated with effective training and supervision. As Bittner (1996) described in her summary of the 1989 *Exxon Valdez* oil spill, "Damage assessment revealed no contamination of the sites by oil, but considerable damage resulted from vandalism associated with cleanup activities, and lesser amounts were caused by the cleanup process itself."

The National Response Team's *Programmatic Agreement on Protection of Historic Properties during Emergency Response under the National Oil and Hazardous Substances Pollution Contingency Plan* clarifies interagency and regulatory aspects of archaeological site protection during oil spill response. The agreement also outlines the Federal On-Scene Coordinator's role in protecting archaeological resources, the type of expertise needed for site protection, and the appropriate process for identifying and protecting archaeological sites during an emergency response. The agreement was followed during the DWH event, and it is assumed that the agreement was effective; however, no reports on the utility of the agreement for that event are currently available.

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges from 75 to 125 thousand bbl (Table 4.4.2-2). A CDE could result in extensive impacts on a large number of archaeological and historic resources. Due to the large area affected by a catastrophic event some resources such as coastal historic sites that are sensitive to prolonged contact with oil could be more heavily impacted. Cleanup crews would be needed in a greater number of locations. This could allow oil to be in contact with resources for a significant amount of time before cleanup efforts could be applied, which could result in impacts to these resources. A greater threat to archaeological and historic resources during a catastrophic discharge event would result from the larger number of response crews being employed. Historically most impacts to archaeological and historic resources during a spill response were the result of vandalism or physical damage from spill response activities (Bittner 1996). A catastrophic discharge event would result in major impacts to numerous archaeological and historic resources from response activities.

The *Programmatic Agreement on Protection of Historic Properties during Emergency Response under the National Oil and Hazardous Substances Pollution Contingency Plan* would be followed during the response to a CDE. As mentioned above, it is assumed that the process identified in the agreement would be effective; however, no assessments of the agreement's application during the DWH event are available.

4.4.15.3 Alaska – Arctic

Archaeological and historic resources in the Alaska region include historic shipwrecks, submerged aircraft, inundated prehistoric sites offshore, and historic and prehistoric sites onshore. These resources have the potential to be affected by the proposed action. Several factors must be considered when assessing any potential impacts on offshore resources in Alaska. First, the locations of most of the cultural resources in the Arctic are currently unknown; this is especially true of submerged cultural resources. If any are discovered during OCS oil and gas activities, they would be subject to archaeological surveys and other activities and mitigations required by applicable laws and BOEM policies. The goal of much of the archaeological research being done in the Arctic is to identify locations and landforms that have the potential to contain archaeological and historic resources. The focus on submerged prehistoric resources in Alaska is due to the theory that North America was first populated by nomadic hunters following game across the submerged land mass known as Beringia that once linked Asia with North America (Hoffecker and Elias 2003). A second factor is that, unlike the GOM region, there is no current archaeological baseline study for Alaska on which to base decisions concerning where cultural resources should be present. A third factor is that sea levels have risen over the last 13,000 years. Human activity tends to concentrate on coasts. Regions that were once coastal are now submerged. The coastline that existed 13,000 years ago is now found at roughly the 50-m (164-ft) bathymetry line (Darigo et al. 2007). It is thought that people first came to North America approximately 13,000 years ago. A fourth factor is that natural processes such as ice gouging may have modified much of the ocean bottom to the extent that many cultural resources no longer exist. Studies conducted in 2007 suggest some nearshore locations may remain intact due to shorefast ice, which kept the ice which normally would scrape

the sea floor away from the coast. Other factors such as the amount of sediment that has collected on a location may improve the potential for some resources to remain intact.

4.4.15.3.1 Routine Operations. Routine activities associated with the proposal that could affect cultural resources include well drilling, platform installation, pipeline installation, and onshore facility and pipeline construction projects that involve ground disturbance. Effects on cultural resources can be determined only on a case-by-case basis. Only through project-specific surveys can cultural resources be identified. The determination that a survey is required depends on several factors, including the potential for landforms to exist that may contain archaeological sites (i.e., submerged coastlines) or archival records suggesting that shipwrecks could be present.

Regulations at 30 CFR 250.194 allow the BOEM Regional Director to require that an archaeological report based on geophysical data be prepared if there are indications that a significant archaeological resource may exist within a lease area. For historic resources, this decision is based on whether an historic shipwreck is reported to exist within or adjacent to a lease area. For prehistoric resources, an analysis is completed prior to each lease sale to consider the relative sea level history, the depth of burial of the late Wisconsinan land surface (i.e., lands that could contain archaeological sites), the type and thickness of sediments burying the old land surface, and the severity of ice gouging at the present seafloor. Lease areas that are shown by this analysis to have the potential for prehistoric archaeological resources are required to have an archaeological survey prior to initiating exploration and development activities. If the survey finds evidence of a possible archaeological resource within the lease area, the lessee must either move the proposed activity to avoid the possible resource or conduct further investigations to determine whether an archaeological resource actually exists at the location. If an archaeological resource is present at the location of proposed activity and cannot be avoided, BOEM procedures require consultation with the State Historic Preservation Office to develop mitigation measures prior to any exploration or development.

Federal, State, and local laws and ordinances, including the National Historic Preservation Act and the Alaska Historic Preservation Act provide a process to facilitate the consideration of known sites and as-yet-unidentified archaeological resources both onshore and offshore. Where there is reason to believe that an archaeological resource might exist in a lease area, existing regulations require archaeological surveys to be conducted prior to permitting any activity that might disturb a significant archaeological site. When required, these archaeological surveys have been found to be effective in locating most archaeological resources prior to any onshore construction project or offshore bottom-disturbing activity; however, even with surveys there is the potential that a shipwreck or an inundated terrestrial site could be missed due to sedimentation on the wreck or other factors, resulting in a routine activity contacting a shipwreck or site. Such an event could result in the disturbance or destruction of unique or significant historic archaeological information.

4.4.15.3.2 Accidents. Oil spills and their subsequent cleanup could impact the archaeological resources of the Alaska region directly and/or indirectly. The geologic history of

specific shorelines generally affects the presence or absence, condition, and age of archaeological sites on or near Alaska region shorelines; however, some type of archaeological resource is present on or adjacent to nearly all Alaska region shorelines. Existing data indicate that archaeological resources are particularly abundant along Gulf of Alaska shorelines (Mobley et al. 1990).

Archaeological resource protection during an oil spill requires specific knowledge of the resource's location, condition, nature, and extent prior to impact; however, large portions of the Alaska region coastline have not been systematically surveyed for archaeological sites. While some response groups have compiled known archaeological site data in a form useful for mitigation during an emergency response (Wooley et al. 1997), these data have not been compiled for all areas of the Alaska region.

Gross crude oil contamination of shorelines is a potential direct impact that may affect archaeological site recognition. Heavy oiling conditions (Whitney 1994) could conceal intertidal sites that may not be recognized until they are inadvertently damaged during cleanup. Crude oil may also contaminate organic material used in ^{14}C dating, and, although there are methods for cleaning contaminated ^{14}C samples, greater expense is incurred (Dekin et al. 1993). Many other anthropogenic sources of hydrocarbons and other possible contaminants also exist, so caution should always be taken when analyzing radiocarbon samples from coastal Alaska (see Reger et al. 1992). A study examining the effects of the 1989 *Exxon Valdez* oil spill on archaeological deposits revealed that oil in the intertidal zone had not penetrated the subsoil, apparently due to hydrostatic pressure (Dekin et al. 1993).

Spill Response and Cleanup. The major source of potential impact from oil spills resulting from the proposed action is the harm that could result from unmonitored shoreline cleanup activities. Cleanup activities could impact beached shipwrecks, or shipwrecks in shallow waters, as well as coastal historic and prehistoric archaeological sites. Unmonitored booming, cleanup activities involving vehicle and foot traffic, mechanized cleanup involving heavy equipment, and high-pressure washing on or near archaeological sites pose risks to the resource. Inadvertent damage from anchors can greatly alter archaeological sites and shipwrecks (Church and Warren 2008). The potential amount of damage depends on several factors, including the presence and density of shipwrecks and archaeological material in the area of activity, the number of vessels being employed in the cleanup activities, and whether offshore decontamination stations were needed and where these facilities were established. These types of impacts could be avoided or minimized if wreck locations are known. Unauthorized collecting of artifacts by cleanup crew members is also a concern, albeit one that can be mitigated with effective training and supervision. As Bittner (1996) described in her summary of the 1989 *Exxon Valdez* oil spill, "Damage assessment revealed no contamination of the sites by oil, but considerable damage resulted from vandalism associated with cleanup activities, and lesser amounts were caused by the cleanup process itself."

The National Response Team's *Programmatic Agreement on Protection of Historic Properties during Emergency Response under the National Oil and Hazardous Substances Pollution Contingency Plan* clarifies interagency and regulatory aspects of archaeological site protection during oil spill response. The agreement also outlines the Federal On-Scene

Coordinator's role in protecting archaeological resources, the type of expertise needed for site protection, and the appropriate process for identifying and protecting archaeological sites during an emergency response. The agreement was followed during the DWH event, and it is assumed the agreement was effective; however, no reports on the utility of the agreement for that event are currently available.

Catastrophic Discharge Event. The PEIS analyzes a CDE that ranges from 1.4 to 2.2 million bbl in the Chukchi Sea Planning Area and from 1.7 to 3.9 million bbl in the Beaufort Sea Planning Area (Table 4.4.2-2). A CDE could result in extensive impacts on a large number of archaeological and historic resources. Due to the large area affected by a catastrophic event some resources such as coastal historic sites that are sensitive to prolonged contact with oil could be more heavily impacted. Cleanup crews would be needed in a greater number of locations. This could allow oil to be in contact with resources for a significant amount of time before cleanup efforts could be applied, which could result in impacts to these resources. A greater threat to archaeological and historic resources during a catastrophic discharge event would result from the larger number of response crews being employed. Historically most impacts to archaeological and historic resources during a spill response were the result of vandalism or physical damage from spill response activities (Bittner 1996). A catastrophic discharge event would result in large impacts to numerous archaeological and historic resources from response activities.

The Programmatic Agreement on Protection of Historic Properties during Emergency Response under the National Oil and Hazardous Substances Pollution Contingency Plan would be followed during the response to a CDE. As mentioned above, it is assumed that the process identified in the agreement would be effective; however, no assessments of the agreement's application during the DWH event are available.

4.4.15.4 Conclusion

Assuming compliance with existing Federal, State, and local archaeological regulations and policies, most impacts on archaeological resources resulting from routine activities under the proposed action should be avoided. BOEM may alter its requirements for archaeological surveys because currently BOEM does not require the submission of archaeological reports based on high-resolution geophysical survey data in all lease sale areas. Without the data analysis included in the archaeological reports, it is impossible to assess whether a proposed activity may impact an unknown cultural resource in the area of potential effect. When required, archaeological reports based on high-resolution geophysical data are believed to provide the information needed by BOEM to develop appropriate avoidance or mitigation strategies to protect cultural resources within the area of potential effect from impacts associated with oil and gas activities on the OCS. Impacts to archeological and historic resources from routine Program activities are expected to range from negligible to major.

In the case of accidental oil spills, and especially CDE-level spills, some impacts could occur on coastal historic and prehistoric archaeological resources. Although it is not possible to predict the precise numbers or types of sites that would be affected, contact with archaeological

sites would probably be unavoidable, and the resulting loss of information would be irretrievable. The magnitude of the impacts would depend on the number of resources affected and on the significance and uniqueness of the information lost. Impacts can result from both direct contact with oil and from cleanup operations. Based on experience gained from the *Exxon Valdez* oil spill, no or very limited impacts from direct contact with oil from even a CDE-level spill are expected, but some impacts are expected during cleanup activities. Response actions associated with a CDE-level spill have the greatest potential for adversely impacting archeological and historic resources

4.5 OTHER ALTERNATIVES

4.5.1 Alternative 2 – Defer the Eastern Planning Area for the Duration of the 2012-2017 Program

4.5.1.1 Description of Alternative 2

Under Alternative 2, no sales would be held in the Eastern GOM Planning Area under the Program, and there would be no change from the proposed action for the other planning areas. Under Alternative 2, the following would take place:

- Five area-wide lease sales in the Central GOM Planning Area;
- Five area-wide lease sales in the Western GOM Planning Area;
- One lease sale with a whaling deferral in the Beaufort Sea Planning Area;
- One lease sale with a 40-km (25-mi) buffer in the Chukchi Sea Planning Area; and
- One special interest lease sale in Cook Inlet.

4.5.1.2 Summary of Impacts

Excluding the Eastern GOM Planning Area from the Program would reduce the number of potential lease sales in the GOM from 12 to 10, and there would be no offshore and onshore oil and gas development activities in the Eastern GOM Planning Area. As a result, none of the localized impacts (short or long term) on water quality, air quality, marine and coastal biota and habitats, or archeological or historic resources that would be associated with development in the Eastern GOM Planning Area would be expected to occur. However, water and air quality, as well as marine and coastal biota and habitats, in some portions of the Eastern GOM Planning Area could be affected by oil and gas leasing and development in the eastern portions of the Central GOM Planning Area.

Because of the relatively small amount of development that would occur in the Eastern GOM Planning Area under the proposed action (no more than 1 installed platform, no more than 17 wells), the population, employment, and income impacts identified for the GOM under the proposed action would be only slightly reduced, and would remain unchanged in the other planning areas.

Under Alternative 2, potential impacts on natural, physical, and socioeconomic resources in Alaska would be the same as those identified from the proposed action.

Under Alternative 2, no oil spills from oil and gas development activities under the Program would occur directly in the Eastern GOM Planning Area. However, spills from development in the other planning areas (especially a large or very large spill in the Central Planning Area) could be carried by currents into the Eastern GOM Planning Area and affect marine and coastal resources, tourism and recreation, commercial fisheries, and local economies. The nature and magnitude of any such impacts on those resources (as described in earlier sections of this chapter) will depend on the location, size, and duration of a spill in the other GOM planning areas.

4.5.2 Alternative 3 – Defer the Western Planning Area for the Duration of the 2012-2017 Program

4.5.2.1 Description of Alternative 3

Under Alternative 3, no lease sales would be held in the Western Planning Area under the Program, and there would be no change from the proposed action for the other planning areas. Under Alternative 3, the following would take place:

- Five area-wide lease sales in the Central GOM Planning Area;
- One or two lease sales in the extreme western portion of the Eastern GOM Planning Area;
- One lease sale with a whaling deferral in the Beaufort Sea Planning Area;
- One lease sale with a 40-km (25-mi) buffer in the Chukchi Sea Planning Area; and
- One special interest lease sale in Cook Inlet.

4.5.2.2 Summary of Impacts

Excluding the Western GOM Planning Area from the Program would reduce the number of potential lease sales in the GOM from 12 to 7. Under the proposed action, there could be as

many as 96 platforms and 534 wells (and associated pipelines, landfalls, and onshore processing facilities) developed in the Western GOM Planning Area. Under Alternative 3, this development would not occur, and as a result none of the short- or long-term localized impacts identified for the proposed action on water quality, air quality, marine and coastal biota and habitats, archeological or historic resources, or land use and infrastructure that would be associated with development and operation of this infrastructure and support activities (such as support vessel and helicopter traffic) in the Western GOM Planning Area would be expected to occur. However, water and air quality, as well as marine and coastal biota and habitats, in some portions of the Western GOM Planning Area could still be affected by oil and gas leasing and development in the western portions of the Central GOM Planning Area, especially if that development uses existing commercial infrastructure (such as shipyards, support centers, processing facilities) and shipping lanes in coastal areas of the Western GOM Planning Area.

Even though a relatively large amount of development would occur in the Western GOM Planning Area under the proposed action, the increases in population, employment, and income identified to occur under the proposed action would be only slightly reduced under Alternative 3, and would remain unchanged in the other planning areas.

Under Alternative 3, potential impacts on natural, physical, and socioeconomic resources in Alaska would be the same as those identified from the proposed action.

Under Alternative 3, no oil spills from oil and gas development activities would occur directly in the Western GOM Planning Area under the Program. However, spills that may occur under Alternative 3 from development in the other planning areas (especially large or very large spills in the Central Planning Area) could be carried by currents into the Western GOM Planning Area and affect marine and coastal resources, tourism and recreation, commercial fisheries, and local economies. The nature and magnitude of any such impacts on those resources (as described in earlier sections of this chapter) will depend on the location, size, and duration of any spills in the other GOM Planning Areas.

4.5.3 Alternative 4 – Defer the Central Planning Area for the Duration of the 2012-2017 Program

4.5.3.1 Description of Alternative 4

Under Alternative 4, no lease sales would be held in the Central Planning Area under the Program, and there would be no change from the proposed action for the other planning areas. Under Alternative 4, the following would take place:

- Five area-wide lease sales in the Western GOM Planning Area;
- One or two lease sales in the extreme western portion of the Eastern GOM Planning Area;

- One lease sale with a whaling deferral in the Beaufort Sea Planning Area;
- One lease sale with a 40-km (25-mi) buffer in the Chukchi Sea Planning Area; and
- One special interest lease sale in Cook Inlet.

4.5.3.2 Summary of Impacts

Excluding the Central GOM Planning Area from the Program would reduce the number of potential lease sales in the GOM from 12 to 7. Under the proposed action, the greatest amount of oil and gas development in the GOM would occur in the Central GOM Planning Area, with as many as 316 platforms and 749 wells (and associated pipelines, landfalls, and onshore processing facilities). Under Alternative 4, this development would not occur, and as a result none of the localized impacts (short or long term) on water quality, air quality, marine and coastal biota and habitats, archeological or historic resources, or land use and infrastructure that would be associated with development and operation of this infrastructure and support activities (such as support vessel and helicopter traffic) in the Central GOM Planning Area would be expected to occur. However, water and air quality, as well as marine and coastal biota and habitats could still be affected in some portions of the Central Planning Area by oil and gas activities in portions of the Western and Eastern GOM Planning Areas that abut the Central GOM Planning Area, especially if those activities use existing commercial infrastructure (such as shipyards, support centers, processing facilities) that are located in the Central GOM Planning Area.

Under Alternative 4, potential impacts on natural, physical, and socioeconomic resources in Alaska would be the same as those identified from the proposed action.

Even with the large amount of development that could occur in the Central GOM Planning Area under the proposed action, under Alternative 4 the increases in population, employment, and income likely to occur under the proposed action would be only slightly reduced, and would remain unchanged in the other planning areas.

Under Alternative 4, no oil spills from oil and gas development activities associated with the Program would occur directly in the Central GOM Planning Area. However, spills from development in the Western or Eastern GOM Planning Areas could be carried by currents into the Central GOM Planning Area and affect marine and coastal resources, tourism and recreation, commercial fisheries, and local economies. The nature and magnitude of any such impacts on those resources (as described in earlier sections of this chapter) will depend on the location, size, and duration of any spills in the other GOM planning areas.

4.5.4 Alternative 5 – Defer the Beaufort Sea Planning Area for the Duration of the 2012-2017 Program

4.5.4.1 Description of Alternative 5

Under Alternative 5, no lease sales would be held in the Beaufort Sea Planning Area under the Program, and there would be no change from the proposed action for the other planning areas. Under Alternative 5, there would be:

- Five area-wide lease sales in the Western GOM Planning Area;
- Five area-wide lease sales in the Central GOM Planning Area;
- One or two lease sales in the extreme western portion of the Eastern GOM Planning Area;
- One lease sale with a 40-km (25-mi) buffer in the Chukchi Sea Planning Area; and
- One special interest lease sale in Cook Inlet.

4.5.4.2 Summary of Impacts

Excluding the Beaufort Sea Planning Area from the Program would reduce the number of potential lease sales in the Arctic from 2 to 1. Under the proposed action, there could be as many as 4 platforms, 136 wells, 249 km (155 mi) of offshore pipeline, and 129 km (80 mi) of onshore pipeline developed in the Beaufort Sea Planning Area and adjacent coastal areas. Under Alternative 5 this development would not occur, and as a result none of the localized impacts (short or long term) on water quality, air quality, marine and coastal biota and habitats, archeological or historic resources, or land use and infrastructure that would be associated with development and operation of this infrastructure and any supporting activities (such as support vessel and helicopter traffic) in the Beaufort Sea Planning Area would be expected to occur. However, water quality, as well as marine and coastal biota and habitats in some portions of the Beaufort Sea Planning Area and adjacent coastal areas, could still be affected by oil and gas leasing and development in the eastern portions of the Chukchi Sea Planning Area.

Under Alternative 5, the increases in population, employment, and income likely to occur under the proposed action would be only slightly reduced, and would remain unchanged in the other planning areas.

Under Alternative 5, potential impacts on natural, physical, and socioeconomic resources in the GOM planning areas would be the same as those identified from the proposed action.

Under Alternative 5, no oil spills from oil and gas development activities associated with the Program would occur directly in the Beaufort Sea Planning Area. However, a spill that may occur under this alternative in the Chukchi Sea Planning Area could be carried by coastal currents into the Beaufort Sea Planning Area and affect marine and coastal resources, subsistence whaling, tourism and recreation, and local economies and communities. The nature and magnitude of any such impacts on those resources (as described in earlier sections of this chapter) will depend on the location, size, and duration of a spill in the Chukchi Sea Planning Area.

4.5.5 Alternative 6 – Defer the Chukchi Sea Planning Area for the Duration of the 2012-2017 Program

4.5.5.1 Description of Alternative 6

Under Alternative 6, no lease sales would be held in the Chukchi Sea Planning Area under the Program, and there would be no change from the proposed action for the other planning areas. Under Alternative 6, the following would take place:

- Five area-wide lease sales in the Western GOM Planning Area;
- Five area-wide lease sales in the Central GOM Planning Area;
- One or two lease sales in the extreme western portion of the Eastern GOM Planning Area;
- One lease sale with a whaling deferral in the Beaufort Sea Planning Area; and
- One special interest lease sale in Cook Inlet.

4.5.5.2 Summary of Impacts

Excluding the Chukchi Sea Planning Area from the Program would reduce the number of potential lease sales in the Arctic from 2 to 1. Under the proposed action, there could be as many as 5 platforms, 300 wells, and 402 km (250 mi) of offshore pipeline developed in the Chukchi Sea Planning Area. Under Alternative 6, this development would not occur, and as a result none of the localized impacts (short or long term) on water quality, air quality, marine and coastal biota and habitats, archeological or historic resources, or land use and infrastructure that would be associated with development and operation of this infrastructure and any supporting activities (such as support vessel and helicopter traffic) in the Chukchi Sea Planning Area would be expected to occur. However, water quality, as well as marine and coastal biota and habitats, and land use and infrastructure in some portions of the Chukchi Sea Planning Area and adjacent coastal areas, could still be affected by oil and gas leasing and development in the western portions of the Beaufort Sea Planning Area.

Under Alternative 6, the increases in population, employment, and income likely to occur under the proposed action would be only slightly reduced, and would remain unchanged in the other planning areas.

Under Alternative 6, potential impacts on natural, physical, and socioeconomic resources in the GOM planning areas would be the same as those identified from the proposed action.

Under Alternative 6, no oil spills from oil and gas development activities under the Program would occur directly in the Chukchi Sea Planning Area. However, spills from development in the Beaufort Sea Planning Area could be carried by coastal currents into the Chukchi Sea Planning Area and affect marine and coastal resources, subsistence whaling, tourism and recreation, and local economies and communities. The nature and magnitude of any such impacts on those resources (as described in earlier sections of this chapter) will depend on the location, size, and duration of a spill in the Beaufort Sea Planning Area.

4.5.6 Alternative 7 – Defer the Cook Inlet Planning Area for the Duration of the 2012-2017 Program

4.5.6.1 Description of Alternative 7

Under Alternative 7, no lease sales would be held in the Cook Inlet Planning Area during the Program, and there would be no change from the proposed action for the other planning areas. Under Alternative 7, the following leasing activities could take place:

- Five area-wide lease sales in the Western GOM Planning Area;
- Five area-wide lease sales in the Central GOM Planning Area;
- One or two lease sales in the extreme western portion of the Eastern GOM Planning Area;
- One lease sale with a whaling deferral in the Beaufort Sea Planning Area; and
- One lease sale with a coastal deferral in the Chukchi Sea Planning Area.

4.5.6.2 Summary of Impacts

Excluding the Cook Inlet Planning Area could result in one less potential lease sale in the Alaska Region. All offshore and onshore oil and gas activities and production associated with this sale would not occur. The small amount of oil assumed to be developed under Alternative 1 in Cook Inlet would be compensated for by imported oil. It is unlikely that the additional amount of imported oil that could occur under Alternative 7 will measurably affect the number of tanker oil spills that occur in other offshore areas in the United States.

The analyses of impacts of Alternative 1, the Proposed Action, in Cook Inlet showed in almost all cases temporary and localized impacts. Any disturbance to existing environmental conditions associated with routine operations or an oil spill would be expected to be ameliorated on a time scale of days to a year or two. Under Alternative 7, these short-term localized impacts would not occur. Under the Proposed Action, no population-level impacts were predicted for biological resources, although several endangered and/or threatened bird species would be vulnerable to mortality from oil spills. A moderate to large oil spill could affect a relatively large number of Steller's eiders, which overwinter in Cook Inlet. However, because the eider does not breed in Cook Inlet, the breeding populations would not be directly affected, although the number of eiders that arrive in the Arctic for breeding could be reduced. The endangered short-tailed albatross occurs uncommonly in Cook Inlet, so large numbers of birds would not be affected by a spill. Furthermore, the albatross breeds outside Cook Inlet, so the breeding population would not be affected. Kittlitz's murrelets, a candidate for listing under the Endangered Species Act, also occur in Cook Inlet and would be expected to come in contact with spilled oil while foraging. Impacts on these species under Alternative 1 would be contained within the Cook Inlet area and would not extend to other planning areas in Alaska where these species also occur during different life stages or seasons. Under Alternative 7, none of these localized impacts on protected species would occur from OCS activity.

While no long-term population-level impacts on terrestrial mammals in the Cook Inlet area are expected under Alternative 1, increased mortality of brown and black bears could occur if previously remote areas were converted to industrial use, resulting in increased conflict between bears and humans. A large oil spill that affected intertidal areas could lead to significant mortality of eggs and juvenile fish of pelagic species, such as the salmon, leading to reduced adult survival. The overall fish populations in South Alaska, however, would not be affected. A large spill could temporarily affect fisheries in the area that were contacted by the spill. While no long-term impacts on the fish populations are expected, economic impacts on commercial and recreational fisheries could result as a result of loss of gear, closings of affected areas, and unavailability of fishing areas during cleanup operations. These temporary and localized impacts in Cook Inlet, which are unlikely given the small amount of activity expected under Alternative 1, would be precluded under Alternative 3.

Impacts on air and water quality under Alternative 1 in Cook Inlet are expected to be short-term and localized because of the small amount of activity anticipated and the largely pristine quality of the air and water environments there. Therefore, Alternative 3 will not result in a major difference from Alternative 1 for these resources.

The analysis of archaeological resources indicated that existing BOEM requirements for archaeological surveys would be expected to eliminate most of the possible impacts on historic and prehistoric resources. Impacts were possible from cleanup operations after an oil spill. Given the small amount of liquid hydrocarbons expected to be produced under Alternative 1 in Cook Inlet, compounded with the requirement that the spill would have to contact areas with historic or prehistoric resources for impacts to occur, Alternative 3 is not expected to result in a significant difference from Alternative 1 with regard to the potential for archaeological resource impacts.

The population, employment, and income impacts anticipated under Alternative 1 in the Cook Inlet area would not occur under Alternative 3. Table 4.4.9-2 shows estimates of 4,520 jobs and $152 million in income resulting from Alternative 1 in the Cook Inlet area during the life of the Program.

4.5.7 Alternative 8 – No Action

The National Environmental Policy Act requires consideration of a No Action Alternative to every major Federal action that could result in significant impacts on the environment. In the context of the Program, the No Action Alternative is defined as the scenario in which BOEM holds no OCS oil and gas lease sales during the Program. Under this scenario, none of the potential environmental impacts associated with oil and gas related activities under the proposed action that have been evaluated in Section 4.4 would occur. These precluded impacts would include both the anticipated effects under the proposed action of routine operations and accidental discharges on ecological conditions and the effects of leasing on regional employment, regional income, and sociocultural stability. In addition, the oil and natural gas that would have been produced as a consequence of sales over the 5-yr program period would not be available to consumers, who would therefore need to obtain energy from other sources. The energy substitutes needed to replace the lost OCS production would be associated with their own potential environmental effects that could occur throughout the United States or the world depending on the mix of specific energy substitutes that would be used. The analysis that follows considers these factors to evaluate the overall effects of implementing the No Action Alternative. Information is first presented on the various uses of energy in the economy and on the current and projected uses of oil and gas compared to other fuel or alternate energy sources in each economic sector. Substantial discussions of the current status and projected developments in alternate energy sources for each sector of the economy are provided. A scenario of energy substitutes is then developed that projects the mix of energy substitutes that would be used to replace lost OCS production during the life of the program. This scenario is used to evaluate the anticipated broad effects of implementing the No Action Alternative in each program area as well as in other areas that could be affected by the energy substitutes used to replace lost OCS production.

4.5.7.1 Oil and Gas Uses and Alternatives

The primary energy sources used in the United States are petroleum, coal, natural gas, nuclear energy, and hydroelectric and non-hydroelectric power, the latter of which includes geothermal, wind, and solar power. The U.S. Energy Information Administration's *Annual Energy Review for 2009* reports that the largest portion (over 39%) of our energy comes from liquid fuels, primarily petroleum, and natural gas adds another 23% (EIA 2009a).

4.5.7.1.1 Transportation Sector. Total energy use in the transportation sector has grown by an average of just over 1% per year over the last 20 yr. As of 2008, the transportation sector accounted for an estimated 28% of all energy consumption in the United States, a

proportion that has been slowly rising since the 1960s. The vast majority of this energy has come from oil — nearly three-fourths of all petroleum consumed in the United States in 2008 was used for transportation — with natural gas, electricity, and other alternatives playing much smaller roles (EIA 2008a). In this section, we discuss recent trends in the use of oil and gas in the transportation sector and the potential for substitutes for these energy sources within the time frame of the 40- to 50-yr life of the Program.

Uses of Oil and Gas in the Transportation Sector.

Ground Travel. Oil is the dominant energy source for ground travel. Approximately 141 billion gal of gasoline and 45 billion gal of diesel fuel were consumed for ground travel in 2007. Growth in consumption has been slow but steady in recent years, averaging about 1% per year from 2003 to 2007 (EIA 2007a). However, motor gasoline use fell by about 3% from 2007 to 2008, the first time total annual consumption has fallen since 1988–1991. Preliminary data show consumption remaining flat from 2008 to 2009 (EIA 2009b).

The use of natural gas as a vehicle fuel (in both compressed and liquid forms) has increased significantly in recent years, with an average annual growth rate of 8.5% from 2003 to 2007. However, natural gas still represents a small fraction of the total (just over 200 million gal of gasoline-equivalent in 2007, or about 1% of total vehicle fuel). In 2007, approximately 117,000 gas-fueled vehicles were in use, many of which were buses and other fleet vehicles (EIA 2007b).

Ethanol is currently the most used alternative fuel; consumption increased from 1.9 million gal of gasoline equivalent in 2003 to 4.7 million gal in 2007 (mostly as an additive in modest proportions to gasoline, although it is sometimes used as the dominant fuel source in an 85/15 ethanol-gasoline mix). Biodiesel use rose even more quickly over that period, but remains relatively modest overall at 470,000 gasoline equivalent gallons. Electricity, hydrogen, and other fuels contributed very little; electricity use for vehicle transportation actually declined slightly over this period (EIA 2007b).

Air Travel. Certified U.S. air carriers used 18.9 billion gal of fuel in 2008, which was 7.6% of the total consumed by the U.S. transportation sector. Fuel use for air travel has risen much faster than use for ground travel; total consumption rose by 4.6% per year from 2003 to 2007 before falling in 2008 (USDOT 2009c), indicating a strong linkage to larger economic factors. Petroleum-derived kerosene-style jet fuel accounts for nearly all of the fuel used for air travel.

Marine Travel. Marine travel accounts for a relatively small proportion of total oil consumption in the transportation sector and, as with air travel, there is no natural gas consumption. Total fuel consumption for marine travel was about 1,367 trillion Btu in 2007, roughly three-fourths the amount used by air travel and 6% of the total for the sector. Marine travel does show greater variation in fuels; residual fuel oil makes up about 70% of oil use, distillate and diesel fuel oil another 20%, with the remainder in gasoline. This mix has remained fairly consistent over time (USDOT 2010).

Total oil consumption for marine travel has shown no clear trend over time, with periods of sharp declines following years of growth, and vice versa. After dropping by nearly 30% from 2000 to 2003, fuel use increased nearly as dramatically to reach comparable levels by 2007. Consumption decreased in 2008. Taking a longer-term view does little to clarify the situation (USDOT 2010).

Rail Travel. Similar to marine travel, rail travel constitutes a small proportion of total oil consumption and virtually no natural gas consumption. Total oil use was 576 trillion Btu in 2007; the overwhelming majority of this was for freight transport, rather than passengers. Distillate and diesel are the fuels used (USDOT 2010).

Following a low of 414 trillion Btu in 1990, oil consumption for rail transportation grew steadily to 594 trillion Btu in 2006, before falling to 576 trillion in 2007 (USDOT 2010). Thus, it appears that fuel use for rail transportation is in the midst of a long-term increase, although the slide during the 1980s indicates that this is by no means inevitable.

Analysis of Energy Substitutes in the Transportation Sector. In this section we analyze the potential for substitution away from fossil fuels within the time frame of the 40- to 50-yr life of the Program. Our focus is primarily on ground transportation, which could demonstrate lower fuel consumption through efficiency improvements, a shift toward greater use of public transportation, or use of alternative fuels. We also discuss the potential for oil substitution in air travel through both efficiency improvements and fuel switching.

More Efficient Vehicles. Automobiles in the United States currently have a lifespan of about 14 years. While some individual vehicles will remain in use for a longer period of time, it seems safe to assume that the Nation's fleet will have turned over nearly in its entirety within 20 years. As of 2007, there were 254.4 million registered highway vehicles, of which 135.9 million were passenger cars, 7.1 million were motorcycles, and 111.3 million were other vehicles (primarily light- and heavy-duty trucks); population growth is likely to add substantially more vehicles, even if the number of vehicles per capita continues to fall (USDOT 2009d). Thus, there is huge potential for oil reductions through efficiency improvements in the Nation's automobiles. Since natural gas makes up such a small proportion of fuel used for transportation, we do not consider it further.

In the near term, the efficiency of the Nation's vehicle fleet is likely to be determined more by stricter regulatory requirements than by a demand from consumers for yet-more-efficient vehicles. CAFE standards currently stand at 27.5 mpg for passenger cars and 23.1 mpg for light trucks. Building on requirements in the 2007 Energy Policy Act, however, the Obama Administration has established stricter targets, setting a schedule that steadily raises the requirements to an end point of 35.7 mpg in 2015 for cars and 28.6 mpg for trucks. The new vehicles subject to these limits will replace older, retired vehicles manufactured in the late 1990s and early 2000s, whose fuel efficiency was, on average, about 8 mpg lower. This is equivalent to a 23% savings in fuel use for passenger cars, or a 28% savings for light trucks. If we hold the number of miles driven per vehicle steady at 2007 levels, we can expect a total savings of 12.3 billion gal of gasoline per year by 2015 as a result of the stricter vehicle standards.

Hybrid Vehicles. Hybrid vehicles are already fairly well established, with all of the major automakers now mass-producing hybrid models. While hybrids will remain somewhat more expensive than conventional cars in terms of the upfront cost, the premium will likely fall as technology improves and manufacturers continue to scale up production. With sufficiently strong tax incentives or other forms of policy support, hybrids could theoretically entirely replace conventional automobiles.

Rough calculations of the scale of the impacts that such a shift would entail suggest a large potential for reducing the consumption of gasoline. If population growth continues at its current pace, there will be about 393 million people in the United States in 2035; this will likely translate into roughly 300 million vehicles. Projecting a 30% savings per vehicle (based on the hybrid and traditional Toyota Camry models) would imply a total savings of 49 billion gal of gasoline — more than one-fourth of total current consumption for ground transportation. Clearly, this is a very rough, illustrative figure, but it nonetheless shows that hybrid vehicles have the potential to offset a significant fraction of oil use. While we do not discuss other types of fuel efficiency improvements (such as switching from trucks to cars or using more lightweight materials), the scope for potential gains would be similar.

Electric and Plug-in Vehicles. The impact of plug-in hybrid and electric vehicles is likely to be comparatively modest, even over a fairly long 25-year horizon. Plug-in hybrids use 20 to 55% less gasoline than traditional hybrids, depending on the mix of electricity and gasoline used (NRC 2010); electric vehicles, of course, use no oil at all. The existence of 40 million plug-in hybrids, the high estimate from the National Research Council (NRC), would imply a savings of about 12 billion gal of gasoline per year. While the NRC report did not consider all-electric vehicles, a similar number of electric vehicles (a very aggressive assumption) would save about 22 billion gal of gasoline per year. The 13 million vehicles considered a more likely figure would produce savings of 4 to 7 billion gal.

The keys to future rates of adoption of electric vehicles and plug-in hybrids are the batteries used to replace (in whole or in part) the gasoline-powered combustion engine. Both plug-in hybrids and electric vehicles currently use lithium-ion batteries; conventional hybrids use nickel-metal hydride technology, but are expected to switch over to lithium-ion batteries as well (Pike Research 2009). Within the broad characterization of lithium-ion batteries, there are several different subtypes, each of which can be evaluated on six basic criteria: energy storage capacity, power, safety, performance, life span, and cost. Significantly, none of the battery types currently in use performs well across all six criteria. As a result, the Boston Consulting Group concluded that, absent a major breakthrough, fully electric vehicles that are as convenient as conventional cars will likely not be available by 2020 (Boston Consulting Group 2010).

Similarly, a report from the NRC explored the prospects for plug-in hybrid vehicles by 2030. NRC estimates that, under optimistic assumptions, the maximum number of plug-in electric vehicles on the road at that time would be 40 million; cost and convenience factors suggest that 13 million may be more likely. The NRC report did not anticipate significant cost improvements in lithium-ion batteries in the foreseeable future (NRC 2010).

Ethanol Vehicles. Perhaps the single most important factor driving the long-term adoption of ethanol is the cost of producing cellulosic ethanol. Unlike traditional corn- or sugar-based ethanol, which is derived from starch, cellulosic ethanol uses cellulose as its basis, a structural component of plant cell walls and the most common organic compound on earth. A cost-effective method to produce cellulosic ethanol would allow for the use of a wide variety of feedstocks, including inedible crop residues and plants that grow on marginal agricultural land with little or no active cultivation. This would, in turn, enable far greater use of ethanol as a substitute for petroleum-based fuel.

At this time, cellulosic ethanol production is too expensive to justify large-scale use, due largely to the cost of producing enzymes to convert cellulose into a useable form. However, many observers expect significant cost reductions in the coming years. For example, Novozymes, the world's largest manufacturer of industrial enzymes, announced in February 2010 that it was launching a line of enzymes that it expects will lower overall production costs to under $2 a gallon, which is in line with costs for corn-based ethanol and gasoline (Leber 2010; Motavalli 2010).

If ethanol production costs fall below those of petroleum, further policy support may be unnecessary, as ethanol will become the preferred transportation fuel. Failing this, however, energy policy could play a major role in determining future levels of ethanol use. As was noted above, the Energy Independence and Security Act requires the use of 36 billion gal of ethanol in 2022, of which 16 billion is to be cellulosic ethanol. The U.S. Environmental Protection Agency (USEPA) has not yet established targets for later years (USEPA 2010a).

Another important consideration is whether there is sufficient agricultural capacity to support substantially greater reliance on biofuels — and to do so without causing an unacceptable rise in the price of basic foods, due to upward pressure on demand for agricultural land. A 2005 U.S. Department of Energy/U.S. Department of Agriculture (USDOE/USDA) report examined the feasibility of displacing 30% of the country's petroleum consumption with biomass-based energy, which the authors estimated would require a dry biomass potential of about 1 billion tons per year. That report identified the potential for 368 million dry tons biomass potential per year from forestlands and 998 million dry tons biomass potential from agricultural lands, with "relatively modest changes in land use and agricultural and forestry practices." Agricultural biomass would comprise a mix of crop residues, grains for biofuels, process residues, and dedicated perennial crops. Not all of this would be suitable for conversion to liquid fuels for transportation. Nonetheless, the report makes clear that the United States has the productive capacity to meet a significant portion, but not all, of its transportation fuel demand from biofuels (USDOE and USDA 2005).

The USDOE/USDA study cited above noted several potential environmental impacts from increased use of forest and agricultural land for biofuel production:

- Increased logging could result in greater soil erosion and elevated levels of sediment in surface waters.

- Removing crop residues could reduce soil quality, increase erosion, and release carbon from the soil into the atmosphere.

- In addition, removing the nutrients embodied in crop residues could lead to increased fertilizer use, leading to increased nutrients in water runoff and greater use of fossil fuels for fertilizer manufacture (USDOE and USDA 2005).

In addition, agriculture is relatively fuel-intensive; reliance on petroleum to power machinery and equipment, and to manufacture fertilizers and other inputs, could offset much of the potential for biofuels to reduce overall petroleum consumption. Cellulosic ethanol is expected to have a more favorable lifecycle profile than corn ethanol, but it will nonetheless be unable to reduce petroleum consumption on a 1-to-1 basis.

Overall, if cellulosic ethanol becomes cost-competitive with other liquid fuel sources, and/or if it is given sufficiently strong policy support, it will likely displace a significant amount of petroleum in the long term, possibly as much as 30% or more of total consumption. It is unlikely to have any appreciable impact on natural gas consumption.

Public Transportation. In the short term, cities that have established public transportation systems could see increased ridership on their existing routes. To expand the impact of public transportation over the longer term, cities could build new mass transit systems or expand existing systems, thereby allowing residents to reduce their use of gasoline-fueled automobiles. There are no firm rules regarding how much time is needed to develop new systems, but anecdotal information from cities that have recently created or expanded their transit networks suggests that a 10- to 15-yr time horizon should generally be sufficient for large cities to create or expand light rail systems. Bus-based systems could presumably be implemented in much shorter time frames.

Hydrogen and Fuel Cell Vehicles. Hydrogen has been discussed for some time as the "fuel of the future," touted as being advantageous because of its abundance as an element, its density as an energy carrier, and its lack of harmful emissions. In vehicles, hydrogen fuel can be used in two different ways: burning in an internal combustion engine, or in a chemical reaction in a fuel cell. The focus of this section is on the latter, which has the potential for greater efficiency in the long term. Fuel cells work by separating a chemical fuel, such as hydrogen, into negatively charged electrons and positively charged ions. The electrons are forced through a wire to create an electrical current and power the vehicle. The electrons are then reunited with the ions and oxygen to form pure water. Since there are no moving parts, fuel cells are exceptionally reliable and can last for a very long time.

While hydrogen is one of the most abundant elements on earth, it occurs only rarely in pure elemental form. Hydrogen for fuel must be gathered from another source. Currently, 95% of the hydrogen used in the United States is produced through steam reforming of natural gas, in which high-pressure steam reacts with methane to produce hydrogen, carbon monoxide, and a small amount of carbon dioxide (EERE 2008). A potentially more environmentally friendly, though more expensive, alternative is to split water molecules into hydrogen and oxygen through

the process of hydrolysis. Since hydrolysis is powered by electricity, renewable power sources such as wind or solar power could theoretically be used to produce the hydrogen needed to fuel vehicles.

All of the technology needed for hydrogen-powered, fuel cell operated cars is already in existence, but not at a stage that would permit cost-effective widespread commercial deployment. Key areas of ongoing research include the materials and manufacturing process for fuel cells and, in particular, a reduction in the amount of platinum used. Another area of ongoing research is to develop a more efficient means of producing hydrogen through hydrolysis or from other non-fossil fuel sources, which would ultimately be more environmentally beneficial than production from natural gas.

Perhaps a more critical issue is the "chicken-and-egg" problem inherent in deploying hydrogen fuel on a wide scale. Widespread adoption of hydrogen vehicles will necessitate enormous investments in infrastructure, to make the fuel as widely available as gasoline is at present. However, it will be difficult to justify investment on the scale required until there are enough hydrogen-fueled cars on the road to create sufficient demand to support the industry. So long as there is a sufficient supply of petroleum or biofuels that can use existing infrastructure to meet the needs of the Nation's vehicle fleet, this will pose a serious problem. Sustained policy support will likely be necessary to establish adequate hydrogen fueling infrastructure.

The California Fuel Cell Partnership estimates that if fuel cell vehicles are introduced into the market on a limited scale over the next decade, as expected, they could be widely available by 2030. Due to the significant lag in vehicle turnover, then, it would likely be another 10 to 20 yr before hydrogen could replace oil as the dominant transportation fuel. Ultimately, hydrogen has the potential to replace substantially all of the petroleum used by the transportation sector, but only over a very long time horizon (NREL 2007).

Summary. The review of potential sources of oil and gas savings from the transportation sector showed that the ground transportation sector accounted for about 180 billion gal of gasoline and diesel fuel use in 2008. Air travel consumed roughly 19 billion gal of fuel; marine travel used somewhat less. Natural gas did not play a significant role as a transportation fuel.

In the near term, major sources of potential fuel savings include more efficient gasoline-powered automobiles and substitution of biofuels for gasoline in automobiles. These two sources could save approximately 17 billion gal of gasoline per year by 2015, or about 10% of the total for ground transportation. Hybrid and electric vehicles and increased use of public transportation could contribute more modest savings.

The potential for oil savings is greater in the longer term. Cellulosic ethanol could displace as much as 30% of total oil consumption. Hybrid and electric vehicles, increased use of public transportation, and more efficient planes could generate oil savings as well, albeit in more modest amounts (likely on the order of 9 billion to 14 billion gal gasoline-equivalent). Finally, if adopted on a wide scale, hydrogen fuel could replace substantially all of the petroleum used by the transportation sector, but only over a very long time horizon, beyond what is under consideration for the Program.

4.5.7.1.2 Electricity Generation Sector.

Uses of Oil and Gas in the Electricity Generation Sector. Petroleum plays a very modest role in electricity generation, and the proportion of U.S. electricity generation from oil-fired power plants has been on a steep decline since the late 1970s. For natural gas, the converse is true; gas-fueled electricity generation nearly doubled over the 10 years from 1997 to 2007. The electricity generation sector is second only to industrial use in terms of overall consumption of natural gas. This section analyzes the use of oil and gas for electricity generation. We begin with an examination of recent trends and current use of oil and gas in the sector, and then discuss the near- and long-term potential for substitutes. A particular focus is on the circumstances under which these fuels are used for electricity generation, and how this affects the ability of renewable energy sources to substitute for these fossil fuels.

Electricity generation consumed 81 million barrels of petroleum in 2008, or about 3.4 billion gal; this translates into total primary energy use of about 469 trillion Btu (EIA 2010c). This represents a steep decline from 2005, when electricity production consumed nearly three times as much oil. Prior to that, oil consumption had remained at approximately the same level since the mid-1980s. Oil consumption in the electricity generation sector peaked in 1977 at 3,900 trillion Btu, more than eight times the current level (EIA 2009c).

Within the electricity generation sector, petroleum is used primarily to fuel "peaker" plants — facilities that stand idle most of the time and are used only at times of very high demand. Generally, such plants are relatively cheap to build but expensive to operate, as the per-unit fuel costs are more expensive than other plants; thus, they are only used when all other options have been exhausted. As a result, oil provides the fuel for only a small fraction of electricity generated in the United States. Petroleum was used to produce 46 million megawatt-hours of electricity in 2008, about 1% of the 4,119 million megawatt-hour total. This was far less than the generation provided by coal, natural gas, nuclear, hydroelectric, or even biomass and wind resources (EIA 2010d).

Since most petroleum-fired plants are used relatively infrequently, these plants contribute a larger proportion of generating capacity to the total than they do actual generation. In 2008, oil-fired plants accounted for 57,445 MW of net summer generating capacity, or 5.7% of total U.S. capacity. This figure has remained fairly steady since 2002, despite the significant drop in petroleum-fueled electricity generation over that time period (during which overall peak electricity demand increased) (EIA 2008c, 2010d). What this indicates is that, for peaker plants in particular, there may not be a strong correlation over the short run between available capacity and actual use. Thus, oil price changes may be reflected to some degree in electricity generation, but it will take a longer time (and a more sustained price change) before total capacity of oil-fired plants is similarly affected.

The use of oil predominantly as a peak fuel means that most oil-fired plants are relatively small, and that there are a relatively high number of them in use. There were 1,205 oil-fired generating stations in 2008, with an average capacity of less than 50 MW each. By comparison, there were half as many coal-fired plants, with an average generating capacity of more than 500 MW.

Thermodynamically, the conversion of fossil fuels into electricity is not particularly efficient; that is, a significant amount of usable energy is lost as waste heat in the process. The use of 469 trillion Btu of petroleum products to produce 46 million megawatt-hours translates into an efficiency of about 34% (100% efficiency would require 3,412 Btu per kilowatt-hour). However, due to the nature of the technologies involved, there is relatively little room for efficiency gains using conventional combustion engines.

Much larger quantities of natural gas are used for electricity generation than petroleum. In 2008, 6,896 billion cubic feet of natural gas, or 7,089 trillion Btu, were consumed in electricity generation — an energy content 15 times greater than that supplied by petroleum. Natural gas use has risen sharply in recent years, growing by an average of 6.3% annually from 2003 to 2008. While that rate may seem modest, it was five times greater than the overall increase in electricity generation. Only coal supplied a larger share of the nation's electricity in 2008 (EIA 2010d).

In terms of generating capacity, natural gas ranks as the largest component of the electricity generation sector, producing 397 million MW in 2008, or 40% of the total. Growth in gas-fired capacity has outpaced overall capacity expansion in recent years (2.2% vs. 1.3% per year), albeit not to the same extent as has generation. Notably, gas generation expanded much more rapidly in the early years of the last decade than in later years, growing more than 16% per year from 1999 to 2003. This was largely in response to the relative flexibility of natural gas power plants, which can be used for baseload, intermediate, or peak generation, and the comparatively favorable environmental profile of such plants compared to coal or nuclear power. As of 2008, there were 1,653 gas-fired power plants in operation in the United States, with an average capacity of about 240 MW (EIA 2010d).

Electricity generation is somewhat more efficient using gas than oil, with an average 42.5% thermodynamic efficiency in 2008. This is partially due to the nature of the combustion engines used for each fuel; since gas engines are more expensive and run more frequently, there is a greater incentive for efficient combustion. However, efficiency has also been rising in recent years as the result of greater use of natural gas combined cycle plants. In a combined cycle plant, the exhaust gases from the gas turbine are used to heat steam which is used to turn a second turbine, thereby capturing the "waste" heat from the first cycle. As these secondary steam turbines are installed in new gas power plants or placed into existing ones, the efficiency of gas-fired electricity generation should continue to improve.

Analysis of Energy Substitutes in the Electricity Generation Sector. As of 2008, natural gas accounted for 40% of electricity generation and petroleum provided an additional 1.8%. Both oil and gas fossil fuel generators have an expected lifespan of about 20 to 25 years. In this time frame, therefore, we can expect a complete turnover of the Nation's oil and gas generators, as well as new additions necessitated by growth in demand. There is significant potential for substitution away from these fuels over that period, depending upon the availability and suitability of other power sources.

Biofuels represent the most obvious potential substitute for petroleum and gas in terms of fuel characteristics, although, as noted above, they are more likely to be used in the

transportation sector, which represents a much larger source of demand. Even assuming significant scale-up of new biofuel production capabilities, the maximum amount available from domestic sources would likely not be enough to meet current levels of both transportation and electricity fossil fuel demand. We therefore exclude biofuels from further consideration here.

Wind and solar power are more likely alternatives to oil and gas as electricity sources.[18] Due to their status as intermittent resources (i.e., generating electricity on an irregular time frame according to the vagaries of weather), however, there are limits to the maximum amount of near-term penetration that these energy sources will likely achieve in a cost-effective manner. A report from the National Renewable Energy Laboratory (NREL) projected that wind power could achieve 20–30% penetration in the eastern United States by 2024, given sufficient investment in transmission upgrades; in the absence of such investment, this level of wind penetration would require significant curtailment (shutting down) of wind plants, with a high associated cost (EnerNex Corporation 2010). Furthermore, a similar study found that 30% wind penetration is technically feasible in the western United States as well, with some modifications to current practice by grid managers (GE Energy 2010). A substantial portion of the long-term wind potential also identified by NREL, 54 gigawatts, is to come from offshore wind. The U.S. has areas appropriate for offshore wind power development near large coastal urban areas. With growing electricity demand and space constraints on land-based electricity generation and transmission, offshore wind is favorably positioned to play a role in meeting future energy demand, though regulatory and permitting requirements may pose challenges in the near term (NREL 2010. In simple terms of magnitude, therefore, wind could theoretically entirely displace oil and gas for electricity generation. Wind is already reasonably cost-competitive with oil and gas, and will become more so if fuel prices rise and/or if climate policy results in a carbon tax or cap-and-trade mechanism. For wind, therefore, the most important constraint will be the ability of the electric grid to accommodate significant amounts of an intermittent resource as well as constructing sufficient transmission infrastructure. Much of the wind potential evaluated by NREL would come from the Great Plains, and while the report emphasizes the benefits of regional integration and coordination, this geographic dynamic suggests that a portion of the wind power is likely to be replacing coal rather than oil or gas.[19] For the coastal areas of the U.S. which rely more heavily on natural gas (and small amounts of oil) for electricity generation than the Midwest for example, any offshore wind development that does come about would help to further educe dependence on fossil fuels. In addition, some amount of oil or gas will be needed to balance the intermittency of wind resources. Nonetheless, wind power could potentially replace a major portion of oil- and gas-fired electricity generation.

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[18] This is true in terms of electricity produced and thus fuel used on an ongoing basis; with regard to capacity, it is a more dubious proposition. Since wind and solar are not firm resources, a certain level of natural gas or oil capacity will generally be required as "backstop" resources to protect against grid problems in times when the supply of these renewables cannot meet the instantaneous demand for electricity.

[19] Although coal is a baseload power source, and thus not directly replaceable by a given wind plant, a widely dispersed network of wind plants could provide sufficiently firm power in the aggregate to eliminate the need for a portion of the region's coal-fired capacity. The NREL report frames its results in terms of smaller increases in capacity of fossil plants, rather than absolute reductions, but it appears that it forecasts wind to displace a mix of coal and gas plants.

Solar power, although not expected to play a significant role in electricity generation over the next few years, could become more important, given the right mix of technological improvements and market or policy influences. A study by the research firm Clean Edge, Inc., and the non-profit Co-op America found that photovoltaic and concentrated solar power could reach 10% of electricity generation by 2025, although this would require a capital investment of hundreds of billions of dollars. As a resource that is generally available during times of peak demand (i.e., warm-weather periods), widespread use of solar power would imply significant displacement of both oil and gas. Such a scenario is dependent on significant cost decreases in the manufacturing process, to be driven both by the realization of economies of scale and by other technological improvements (Clean Edge, Inc. and Co-op America 2008).

All in all, given favorable conditions, solar and wind power could be used to replace a significant portion of oil and gas used for electricity generation. The technical constraints posed by their status as intermittent resources mean that these energy sources cannot be used to completely replace fossil fuels, however, even with investments in the transmission grid and/or in battery storage. While it is not the aim of this report to develop a detailed forecast, some simple math can illustrate the potential scope of the substitution. The EIA's 2010 Annual Energy Outlook forecasts electricity generation to grow at 1% annually over the next 25 yr (EIA 2009d). At that rate, total electricity generation would be approximately 5,389 billion MW-hr in 2035, up from 4,119 billion MW-hr in 2008. If wind is in fact able to reach 20% penetration, and solar to reach 10%, this would imply a total of about 1,078 and 539 billion MW-hr, respectively, produced from these sources. (By way of comparison, wind accounted for 1.34% of all generation in 2008, while solar was virtually zero.) If we assume that half of the growth in these renewables replaces oil and gas, and half coal, then this suggests that they could displace 772 billion MW-hr of oil- and gas-fired electricity annually. This could result in more than 80% of the current total produced from these sources, or roughly two-thirds of what would come from these fossil fuels in 2035 if they were to continue to hold their current proportions of total generation.

Nuclear power represents another potential substitute for natural gas. After years of no new construction, the Nuclear Regulatory Commission is actively reviewing applications for operating licenses for 22 new nuclear power plants; power companies are considering additional plants as well. However, since natural gas is used primarily as an intermediate or peak power source, whereas nuclear power is a baseload resource, the potential for substitution is limited. Furthermore, the extent to which nuclear power will be able to successfully compete with other baseload resources, such as coal or biomass, will depend on climate policy, the relative ease or difficulty of gaining regulatory approval, and fuel cost and availability.

Finally, we note that climate change and energy policy could have a significant effect on shaping the electricity sector. There are several means by which the industry could be shifted away from natural gas and oil. These include:

- *USEPA regulation of greenhouse gases as criteria pollutants under the CAA.* In April 2009, the USEPA declared CO_2 and five other greenhouse gases to be endangering public health and welfare, setting the stage for the agency to regulate them under the CAA. Electric utilities would be a likely first target

for rules that would most likely either take the form of a cap-and-trade system similar to the SO_2 regime already in place or firm facility-level emissions limits. If put in place, such regulations would most likely have the greatest impact on coal, which is more greenhouse gas intensive, and could actually result in greater use of oil and gas as a result (as well as greater use of renewable power sources). The prospects for such regulation are unclear; Congress is considering legislation to preclude the USEPA from issuing such regulations.

- *A Nationwide renewable energy standard.* A renewable energy standard, such as that included in the Waxman-Markey climate bill passed by the House of Representatives, would require electric utilities to meet a minimum amount of electricity demand (e.g., 20%) through renewable sources. In this case, natural gas and oil would likely be impacted more heavily, since they are more expensive than coal and thus are more economically inefficient tradeoffs.

- *Subsidies for renewable energy production.* Finally, policymakers could continue existing incentives for generation from renewable sources, such as the production tax credit of 2.1 cents per kilowatt-hour for wind or the investment tax credit of 30% of the cost of solar installations. This would have largely the same effect (albeit on a more modest scale) as a renewable energy standard, making renewables more cost-competitive compared to other energy sources. Again, as higher-cost resources, natural gas and oil would likely be impacted more heavily than coal.

These or other policy measures will influence the mix of renewables, oil, gas, and other resources in the electricity sector, but they will be unlikely to change the maximum potential levels of substitution described above. Even over a 25-year time horizon, natural gas is likely to contribute a significant portion of electricity generation in the United States.

4.5.7.1.3 Oil and Gas Uses and Alternatives – Industrial Sector.

Current Use of Oil and Gas in the Industrial Sector. The industrial sector used 1.68 billion barrels of petroleum in 2008, with primary energy use of 8,586 trillion Btu. It consumed a similar 8,149 trillion Btu in natural gas, slightly more than was used for electricity generation. The industrial sector was therefore the second-largest petroleum-consuming sector of the economy after transportation and the highest gas-consuming sector (EIA 2009e, f).

Industrial oil use peaked in the United States in 1979 at just less than two billion barrels. More recently, levels of consumption have remained relatively steady from year to year; from 1998 to 2007, annual industrial petroleum use held between 1.77 and 1.91 billion barrels, a difference of less than 10%. Oil use was lower in 2008, likely due to the broad economic downturn in that year. What has changed over the past decades is the composition of the sector's petroleum inputs. Liquid petroleum gases, or LPGs, have steadily increased as a proportion of

total petroleum, from 5% in 1950 to 24.2% in 1980 to 33.3% in 2008. As LPG use has grown, residual fuel oil has virtually disappeared, dropping from 33.4% of industrial oil in 1950 to just 1.7% in 2008 (EIA 2009g). Since LPGs are comparatively cleaner than residual fuel oil, this indicates that the net environmental impact of industrial oil use has moderated over time.

Natural gas use peaked in 1973 at 10,388 trillion Btu, industrial natural gas consumption fell sharply in the late 1970s and early 1980s, before climbing back during the 1990s. Natural gas use has been falling again in recent years, from 9,933 trillion Btu in 1997 to 8,149 trillion Btu in 2008 (EIA 2009f). This could reflect a response to a long-term trend of rising natural gas prices over that time period.

Oil and gas are used for three broad purposes within the industrial sector: (1) to generate heat and steam for industrial processes, either in boilers or in direct process heating; (2) for heating and air-conditioning of ambient air; and (3) as nonfuel feedstocks for a variety of products, including solvents, lubricants, plastics, asphalt, and various chemicals. Oil and natural gas are also used by many industrial facilities for cogeneration, which produces electricity as well as usable heat and steam to be consumed either onsite or by neighboring facilities. These end uses are discussed in greater detail below.

Process Heating. Process heating is the practice of heating particular materials used in manufacturing, including metals, plastics, and ceramics. Process heating softens, melts or evaporates materials, and may be used to catalyze chemical reactions. This can be accomplished through a variety of equipment types, including furnaces, ovens, dryers, and specially designed heaters for the process in question. Process heating systems may use fuel directly or may be electricity- or steam-based; we consider only direct fuel-burning equipment here.

Process heating is the largest industrial fuel use of natural gas. Excluding onsite transportation within industrial facilities, electricity generation, and unspecified uses, process heating accounted for 47% of industrial natural gas use in 2006. In 2002 (the date of EIA's previous Manufacturing Energy Consumption Survey [MECS]), this number stood at 49%. Total gas use for process heating dropped by 9% over that time period.

Process heating is also a major industrial use of petroleum, if nonfuel applications are excluded. Process heating represented 32% of industrial petroleum fuel use in 2006 (once again excluding transportation, electricity generation, and unspecified uses). Petroleum use for process heating dropped 23% from 2002, at which point it had accounted for 42% of industrial petroleum fuel use. If nonfuel applications are included, however, process heating accounted for less than 5% of total petroleum use in both 2002 and 2006 (EIA 2009h, i).

Boilers and Cogeneration. Boilers use a fuel source such as oil or gas to produce steam, which is, in turn, used to heat other materials and/or the ambient environment or to drive turbines. Conventional boilers accounted for 28% of industrial petroleum use for fuel in 2006, with cogeneration responsible for another 20%, a total of 48%. The numbers were somewhat lower for natural gas, at 24% and 16%, respectively, for a total of 40%. Again, these figures exclude onsite transportation, non-cogeneration electricity production, nonfuel applications, and unspecified uses. There was relatively little change in these proportions from 2002. Including

nonfuel use has only a modest impact on natural gas, but drops the proportion of petroleum use for boilers and cogeneration dramatically, to 4% for boilers and 3% for cogeneration. Both natural gas and petroleum use for boilers and cogeneration were virtually unchanged in absolute terms from 2002 to 2006 (EIA 2009j, k).

Heating, Ventilation, and Air Conditioning (HVAC). After process heating and boilers and cogeneration, HVAC is the only significant industrial end use of petroleum and natural gas except use as chemical feedstocks. HVAC accounted for 4% of petroleum and 7% of natural gas fuel use in both 2002 and 2006. The proportion of petroleum use drops to less than 1% when nonfuel applications are factored in. Natural gas use for HVAC saw a modest decline in absolute terms from 2002, matching the overall pattern in industrial gas use, while petroleum remained constant (EIA 2009j, k).

Non-energy Uses. While nonfuel applications make up a relatively small proportion of industrial gas use — just 7% in 2006, down from 11% in 2002 — they account for nearly 90% of petroleum consumption. Thus, the use of petroleum products as chemical feedstocks deserves particular attention.

Over half of the nonfuel consumption of petroleum takes place at petroleum refineries. In addition to various forms of petroleum fuels, refineries also produce a range of petrochemicals, including lubricating oils, paraffin wax, and asphalt and tar; however, the information available is not sufficiently detailed to indicate petroleum use for each of these products (EIA 2009k).[20]

The next most significant source of demand is plastics materials and resins, which accounts for nearly 20% of nonfuel petroleum consumption (EIA 2009k). Plastics come in a wide variety of forms and are used for an equally wide variety of applications, but almost all plastics are composed of chains of carbon and hydrogen (sometimes with other elements included). This structure makes petroleum an ideal feedstock for plastics. Most plastic manufacturing processes have very little material waste and incorporate virtually all of the petroleum input into the final product (Graedel and Howard-Grenville 2005).

The other major consuming sectors of nonfuel petroleum are classified as "petrochemicals" and "other basic organic chemicals." Again, the information available does not provide any further detail. "Other basic organic chemicals" is also a major nonfuel user of natural gas. However, the most significant nonfuel consumer of natural gas is nitrogenous fertilizers, which are widely used throughout the agricultural sector (EIA 2009k).

Notably, nonfuel use of both petroleum and natural gas was significantly lower in 2006 than in 2002. The most significant decline for each came in chemicals. Detailed information was not available for petroleum. For natural gas, the decline was especially significant in

[20] The input source for this sector is classified as "other" in the MECS table regardless of the actual material type (petroleum, natural gas, coal). However, given the function of oil refineries, this energy is almost certainly taken from petroleum products. This discrepancy accounts for much of the "other" nonfuel consumption in the table above.

nitrogenous fertilizers (which fell by 40%), basic organic chemicals (which dropped by 54%), and plastics (83%). Although there is less detail, data from earlier years suggests this may be a sustained decrease rather than an isolated phenomenon. There was relatively little change in nonfuel consumption of petroleum at petroleum refineries or for plastics, the only major categories for which data are available for both years (EIA 2009k).

Analysis of Energy Substitutes in the Industrial Sector. Industrial equipment is typically long-lived. The Chartered Institute of Building Services Engineers (CIBSE) lists the "indicative life expectancy" for boilers at 15–25 yr, and gas- or oil-fired furnaces at 15 yr (CIBSE undated). In addition, such equipment often represents a significant expenditure. As a result, turnover rates are relatively low. Only in extreme circumstances would a change in fuel prices prompt a facility manager to replace petroleum- or gas-fired equipment significantly in advance of its planned retirement date. For that reason, we consider any form of fuel switching that would require replacing major equipment for industrial facilities as a long-term possibility.

The potential for biofuel production has already been discussed in the transportation section and is not repeated in detail here. Biofuels could displace a significant portion of petroleum use over the next 25 yr, perhaps up to 30% of total nationwide consumption, but most petroleum substitution will take place in the transportation sector. Most likely there is comparatively little room for expanded biofuel use in the industrial realm. Furthermore, due to the limits on potential biofuel supply (based on available land to dedicate to growing fuel crops), if overall biofuel use does approach the upper boundary of 30%, any substitution of biofuels for petroleum that did happen in the industrial sector would come at the expense of similar substitution elsewhere. This would be true for bio-based inputs for plastics manufacturing as well as for fuel use.

Industrial facilities could also use equipment powered by electricity instead of oil- and gas-fired equipment. Given that most industrial oil- and gas-using equipment is used simply to provide heat (e.g., for process heating or in boilers), such a move would generally be thermodynamically inefficient; while electricity generation and consumption produce considerable energy losses, combustion for heat is far more efficient at using embodied energy from a fuel source. Even so, electricity is a viable option, and if generated from renewable sources, it may result in lower environmental impacts.

For non-fuel uses such as plastics, there may be greater potential for substitution away from petroleum. The manufacture of bio-based plastics, mostly produced from starch, sugar, and cellulose, increased by 600% between 2000 and 2008, although they still represent a small proportion of total plastics (Ceresana Research 2009). Globally, demand for bio-plastics is forecast to grow at approximately 25% annually from 2010 to 2015 (Pira International 2010). This suggests the potential for bio-based plastics to replace a portion of conventional plastics.

Plastics manufacturing accounted for the equivalent of 1,198 trillion Btu of petroleum consumption in 2006. While it is not clear what proportion of total plastic produced in the United States currently derives from non-petroleum sources, 5–10% appears to be reasonable, based on global estimates (U.K. National Nonfood Crop Centre 2010; Nova Institute 2009). From this base, the projected growth rates in bio-plastic manufacture just reported would suggest

that an additional 130–260 trillion Btu of petroleum for plastics manufacturing could be replaced by biological feedstocks over the next 5 years. This amounts to approximately 1.5–3% of total industrial petroleum use (EIA 2009g).

Increased plastic recycling would be a form of substitution away from industrial petroleum use. A recent report on the European plastics industry notes that Germany recycled the highest proportion of its post-consumer plastic waste of any European country, at 33.9%; an additional 60% of Germany's plastic waste was sent to waste-to-energy plants (PlasticsEurope, EuPC, EuPR, and EPRO 2010). Compared to the United States' current 7.1% recycling rate, this would constitute an ambitious goal. We therefore use it as an upper boundary on the potential for long-term recycling in the United States.

Thirty million tons of plastic waste was generated in the United States in 2009; this figure has held relatively constant in recent years (USEPA 2010b). If this level of waste production continues into the future, 33.9% recycling would represent an increase of 26.8% above current levels, or an additional 8 million tons of plastic. This level of recycling would save 192 trillion Btu of petroleum, or about 2.2% of total industrial petroleum use (EIA 2009g).

4.5.7.1.4 Residential and Commercial Sector.

Uses of Oil and Gas in the Residential and Commercial Sector. Oil and gas use in residences and commercial establishments is dominated by only a few particular end uses. There has been a long-term shift away from oil use and toward electricity in these applications, while natural gas use has not changed as dramatically. The potential substitutes for commercial and residential use of oil and gas are also similar to those for the commercial sector, consisting mainly of electricity and biogas, although efficiency could also be considered a feasible substitute in certain applications.

The commercial and residential sectors consume negligible amounts of petroleum compared to the transportation and industrial sectors, but contribute more substantially to gas consumption. Residences used 1,204 trillion Btu of petroleum in 2008; commercial buildings used another 638 trillion Btu, for a total of 1,842 trillion Btu (378 million barrels) (EIA 2009l, m). This amounts to just 5% of nationwide petroleum consumption (EERE 2011a). For natural gas, the residential sector consumed 4,989 trillion Btu in 2008 and the commercial sector consumed 3,211 trillion Btu, for a total of 8,200 trillion Btu (EIA 2009l). Combined, these sectors accounted for 34% of gas consumption, nearly equivalent to industrial levels and more than electricity generation (EERE 2011b).

Petroleum consumption has been falling steadily in both the residential and commercial sectors since the early 1970s. Residential petroleum consumption reached its highest point in 1972, at 2,856 trillion Btu, while commercial use peaked one year later at 1,604 trillion Btu. Overall oil use has fallen by nearly 60% for both sectors since that time (EIA 2009l).

Most residential petroleum and natural gas use is for space heating and water heating. To a lesser extent, these fuels are also used for appliances such as ranges, ovens, and refrigerators.

Similarly, commercial gas and oil use is dominated by space heating and water heating, with additional small amounts for cooking and miscellaneous other applications. Electricity was another major energy source for these applications.

Space Heating. Space heating is the most significant use of petroleum and natural gas in both the residential and commercial sectors. Space heating accounted for three-fourths of all residential oil use and 62% of residential gas use in 2005. Electricity use for space heating was comparatively small. A similar proportion of natural gas use in the commercial sector was for space heating in 2008 (63%), but oil use was minimal and electricity more substantial (EIA 2009n; EERE 2011c).

The proportion of homes with natural gas as their primary heating fuel has declined only slightly over the past several years. In 1980, 55% of homes used gas for space heating; in 2005 the number stood at 52%. The proportion of homes using oil has been cut nearly in half, from 20% to 12%. Perhaps surprisingly, given the low total amount of electricity used for residential space heating, 30% of homes used electricity as their primary heating type in 2005, a figure that has climbed steadily since 1980 (EIA 2009p). The apparent mismatch between total consumption and proportional use suggests that electricity is used for heating primarily in areas with mild winters, and thus low heating demand.

Water Heating. After space heating, water heating is the other most significant end use of oil and gas in the residential and commercial sectors, comprising 21% of residential oil use and 29% of residential gas use in 2005. In the commercial sector, water heating used negligible amounts of oil, but accounted for 18% of natural gas use in 2008 (EIA 2009n; EERE 2011c).

As might be expected, the proportion of homes that use natural gas for water heating is similar to space heating, 53% in 2005. This has remained essentially unchanged since 1980. Just 8% of homes use petroleum for water heating, down from 13%. The remaining 39% of homes relied on electricity for water heating in 2005, a modest increase from 33% in 1980. Less than 1% of homes used other energy sources, such as solar water heating (EIA 2009p).

Cooking and Appliances. Cooking and appliances represent the final major end uses of residential and commercial gas. About 9% of residential and 7% of commercial gas use went toward cooking and appliances; residences also used a small amount of petroleum for these purposes. There is no information readily available on the proportion of homes using oil, gas, and other fuels for these end uses. In absolute terms, however, natural gas for appliance applications grew by about 20% from 1980 to 2005, less than the rate of population growth. Meanwhile, oil use remained essentially unchanged and electricity use increased by 80% (EIA 2009n; EERE 2011c). The rise in total electricity use could be due in part to increased per-capita consumption, but it seems more likely that, matching the trend with space heating and water heating, an increasing proportion of homes are using electricity rather than oil or gas as their primary fuel. It would stand to reason that a home that used gas (or oil) for one major end use would be more likely to use it for others as well.

Analysis of Energy Substitutes in the Commercial and Residential Sector. Furnaces and boilers, water heaters, and cooking appliances — the equipment directly responsible for oil

and gas consumption in the commercial and residential sectors – are durable, long-lived goods. Water heaters have an average life span of 13 years, while furnaces, boilers, and range/ovens typically last for 20 years or more (California Energy Commission undated a). Such items also represent significant investments for most buyers. Thus, similar to industrial consumers, residential and commercial consumers would be unlikely to replace their oil- or gas-fired equipment any earlier than necessary except under extreme conditions. For that reason, we consider any fuel-saving strategy that required major new equipment to be a long-term process. Commercial and residential consumers will have an opportunity to shift away from oil- and gas-fired equipment when their space and water heating equipment and appliances reach the end of their useful lifespan. Construction of new building stock and renovations of existing buildings allow further prospects for substitution.

The easiest mode of substitution would be to replace oil- or gas-fired space and water heating equipment and appliances with electric-powered units, which are readily available and widely used. As noted above, 30% of households used electricity as the primary energy source for space heating in 2005, and 39% used it for water heating. Both of these proportions have been growing over the past several years (EIA 2009p).

However, in most cases there is no clear advantage for any given residence or commercial building to switch to electricity, which is thermodynamically inefficient at delivering heat. The Federal Energy Management Program (FEMP) estimates the annual energy cost of a typical gas water heater as at approximately half the cost of an electric unit (EERE 2010), while the California Energy Commission reports that electricity usually costs three times as much as gas (California Energy Commission undated b). While gas water heaters are generally more expensive up front, the difference in fuel costs outweighs this initial price premium. Similarly, higher operating costs mean that electric furnaces and electric oven/ranges are generally uneconomical compared to gas or oil units (EERE 2011d; California Energy Commission undated c). Nonetheless, electricity remains a viable, if unlikely, substitute for these end uses. The associated environmental impacts would depend on the fuel mix used to produce the electricity. These issues have been discussed previously, and we do not repeat them here.

A second substitute comes in the form of renewable energy, and specifically, solar water heaters. Solar water heaters use collectors to gather solar energy, which is then used to heat water in a storage tank. Active solar water heaters contain a circulating pump, while passive systems do not. Although solar water heaters are most effective in warm, sunny areas such as Florida or California, they can be used in colder locations as well; Germany, for example, has more than 9,800 MW(t) of solar thermal capacity installed, while Austria has more than 3,200 MW(t); most, but not all, of this is for water heating (Eurobserv'er 2011). In the United States, all 50 States have some form of incentive for solar water heating systems, while the Federal Government provides a tax credit covering 30% of the installed cost of such systems (N.C. Solar Center and Interstate Renewable Energy Council, undated).

Solar water heaters usually have a gas or electric backup, to provide supplemental heating on cloudy days, in cold seasons, or in high-demand hours. As a result, they do not eliminate gas use entirely; the Solar Rating & Certification Corporation and the Energy Star program both estimate that typical solar water heaters cut gas consumption in half (Solar Rating and

Certification Corporation undated; USDOE and USEPA undated a). If applied nationwide, this would imply residential gas savings of 700 trillion Btu and an additional oil savings of 150 trillion Btu. Solar water heating in the commercial sector could contribute modest further savings. For example, a 10% adoption, with savings of 70 trillion and 15 trillion Btu, would represent an enormous increase over current levels (less than 1% of U.S. homes used solar water heaters in 2005) (EIA 2009p). However, this would require massive policy support; without generous tax credits or other incentives, the higher upfront cost of a solar water heating system would make it uneconomical for most consumers to purchase them, especially in less favorable climates, therefore, wide-spread adoption of the use of solar water heating is at present unlikely.

The other options for long-term substitution involve improvements to the building stock itself. Improved building envelope efficiency has already been discussed as a short-term option. We estimated above that if 200,000 homes per year are renovated, the resulting savings could reach 8.5 trillion Btu annually after 5 yr. Simply extending this trend to a 25-yr period would indicate that renovations to 5 million homes could save 42.5 trillion Btu in oil, gas, or electricity used for space heating. Of course, a more aggressive approach covering more homes would see proportionally greater impacts.

Over the long run, the building stock will also go through a more fundamental transformation, as new buildings are built to replace aging ones and to accommodate population growth. One well-regarded analysis estimates that 89 million new or replaced homes and 190 billion ft^2 of nonresidential building will be constructed by 2050, and that two-thirds of buildings that will exist at that time did not exist in 2007 (Ewing et al. 2008). For context, in 2005 there were an estimated 111 million households nationwide (EIA 2009p).

Given the massive scale of building expected, more efficient construction could produce substantial savings in oil and gas use for space heating (as well as electricity, for both heating and cooling). This could take the form of a greater number of high-efficiency buildings, such as those constructed to the Energy Star or Leadership in Energy and Environmental Design (LEED), managed by the EPA and the Department of Energy (USDOE and USEPA undated b), and the U.S. Green Building Council's LEED family of standards (U.S. Green Building Council 2011a). Further, improvements to building codes that raise minimum performance requirements for all buildings would contribute to substantial savings in oil and gas use for space heating.

Specifically, the Energy Star program reports that 14,475 commercial buildings are currently Energy Star-certified, which means they must be more efficient than 75% of comparable buildings nationwide. This is roughly equivalent to 25% less energy use. As of March 2011, there were just over 30,000 registered commercial LEED building projects A 2008 study found that, while there was considerable variation between projects, the average LEED-certified commercial building had energy use 25% below that of conventional buildings (Turner and Frankel 2008). Overall then, we can assume that new commercial buildings meeting either the LEED or the Energy Star standard will result in at least a 25% reduction in energy use below current levels.

Both Energy Star and LEED also have programs addressing homes. Energy Star homes must be at least 15% more efficient than the 2004 International Residential Code, but with the additional energy-saving features included, they are, again, typically 25–30% more efficient than standard homes. There are currently more than 1 million Energy Star homes in the United States (USDOE and USEPA undated c). The LEED for Homes program has not been as popular, with just under 50,000 registered homes as of March 2011. As with commercial buildings, LEED measures energy gains versus standard new buildings. It estimates an average of 30% energy savings for LEED-certified homes (U.S. Green Building Council 2011b).

We can safely assume that most if not all new residential and commercial buildings will meet the stricter minimum standards envisioned by the latest IECC and ASHRAE energy codes. Meanwhile, the overall impact of LEED, Energy Star, and other voluntary green building standards will depend on market penetration. While not attempting a definitive analysis, we can make some rough, order-of-magnitude approximations to demonstrate the scale of potential savings. If, over the next 25 years, half of all currently existing residences and commercial buildings are replaced, through new construction or retrofits, with buildings that are 25% more efficient in space heating (a conservative estimate, since space heating will likely account for a disproportionate level of total energy savings), this would translate into an aggregate 12.5% reduction in space heating energy demand, or about 564 trillion Btu of natural gas and 164 trillion Btu of oil. If 10% of these buildings met Energy Star and/or LEED standards and realized a further 25% improvement from the new baseline, they would save an additional 42 trillion Btu of natural gas and 12 trillion Btu of oil from space heating. In total, then, under these assumptions, more efficient new buildings could save approximately 782 trillion Btu of oil and natural gas per year within 25 years.

4.5.7.2 Analysis of the Environmental Effects of the No Action Alternative

The selection of the No Action Alternative would eliminate all oil and gas activities that were projected to occur under the Program. OCS-related activities could still occur, however, in these areas as a result of leasing activity during previous and future programs. At the same time, the No Action Alternative would require energy substitutes to replace the oil and gas production that would not occur as a result of the Program. The energy substitutions would be associated with their own potential environmental impacts that could occur within or outside program areas that were considered in the proposed action.

4.5.7.2.1 Energy Substitutions for OCS Oil and Gas. With less oil and gas available from the OCS under the No Action Alternative, consumers could obtain oil and gas from other sources, substitute to other types of energy, or consume less energy overall. Similarly, energy production may shift from OCS oil and gas to onshore oil and gas, overseas oil and gas production, or domestic production of oil and gas alternatives (e.g., coal). Each of these shifts in consumption and production relative to the proposed action yield environmental impacts that this section evaluates.

The process for calculating these impacts begins with the application of MarketSim, a multi-market equilibrium model that simulates the energy supply, demand, and price effects of OCS oil and gas production compared with baseline projections from the EIA's Annual Energy Outlook. In addition to simulating oil and natural gas markets, MarketSim includes separate modules for coal and electricity, enabling the model to capture the broad effects of the No Action Alternative across individual segments of the energy market. Modeling each of these sectors, MarketSim produces an estimate of the energy market's response to the absence of production that would occur as a result of the No Action Alternative.

Table 4.5.7-1 presents the changes in energy markets projected by MarketSim for the No Action Alternative. The table presents the quantities of the energy sources that would be used to replace the lost production of OCS hydrocarbons under the NAA. The quantities of domestic onshore production of both oil and natural gas is projected to increase but will make up for only a fraction of foregone OCS production. To ensure that demands for oil and gas are met, MarketSim projects a sharp increase in oil and gas imports under the No Action Alternative, via both tanker and pipeline. The model also projects that the reduction in OCS oil and gas production under the No Action Alternative will be replaced by an increase in domestic coal and electricity production and by energy conservation.

TABLE 4.5.7-1 Cumulative Energy Substitutions for Oil and Gas Under the No Action Alternative

Energy Sector	Quantity[a]	Replacement Percent (%)
Domestic Onshore Oil	53–402	1–3
Domestic Onshore Gas	759–2,326	13–17
Oil Imports	3,540–7,870	56–62
Gas Imports	458–1,224	8–9
Other	108–274	2
Coal	335–925	6–7
Electricity[b]	146–388	3
Reduced Demand[c]	330–814	6

[a] Quantities expressed as energy equivalents of a million bbl (Mbbl) of oil. Values derived from MarketSim output rounded to the nearest Mbbl. Range of values based on price assumptions of $60 and $160/bbl for oil and $4.27 and $11.39 per million cubic feet of gas. Quantities were calculated for a 40 year time period, which is slightly different than the 40-50 year assumed life of the program.

[b] Electricity generated from sources other than oil, gas or coal such as nuclear, hydro, solar and wind.

[c] Demand reductions resulting from energy conservation.

MarketSim projects that natural gas consumption will decline, while domestic consumption of oil, coal, and electricity will increase. Given that domestic oil production declines under the No Action Alternative, the increase in oil consumption may be somewhat unexpected. This increase in consumption reflects the fact that oil and gas are substitutes within the industrial sector and, to a lesser extent, the residential and commercial sectors. Therefore, as natural gas prices increase under the No Action Alternative, consumption of substitutes, including oil, increases. The increase in oil prices under the No Action Alternative may cause substitution in the opposite direction (i.e., from gas to oil), but the impact of increased gas prices is the more dominant of the two effects.

4.5.7.2.2 Impact Analysis.

Oil Spills. Table 4.5.7-2 shows the amount of oil projected to be developed in the planning areas considered in the Program and the amount of additional oil imported into planning areas that would be at risk from tanker spills because of their location relative to ports and terminals that would receive oil imports under the No Action Alternative. The table presents volumes of oil as a single quantity, rather than as a range of values, to simplify the comparison of quantities. The number of oil spills greater than 1,000 bbl that could result from import tanker accidents under the No Action Alternative and from accidents at OCS facilities and pipelines under the Proposed Action are presented. The number of spills was calculated by applying oil spill rates to the volume of OCS production and to the volume of import tankering projected under the two alternatives. Notably, the GOM is projected to experience four fewer large spills under the No Action Alternative. Part of this reduction is explained by the fact that the volume of oil imports under the No Action Alternative is smaller than the precluded volume of OCS oil that would have been produced under the No Action Alternative. Another factor is that tankering has a lower spill risk than OCS production in part because OCS production includes the risk of spills during both the production and the transportation phases, while tankering involves only risk during transportation. The production risk associated with oil import substitutes would occur in oil-exporting nations. It is interesting to note that while the Central GOM Planning Area accounts for most of the OCS oil production, and therefore would experience the greatest amount of reduction in oil spill risk under the No Action Alternative, the Western GOM Planning Area would experience the greatest amount of risk from the increased import tankering that is projected to occur.

Cook Inlet is projected to produce a small amount of oil under the proposed action and to import a small amount of oil as an energy substitute under the No Action Alternative. As a result, there would be no appreciable difference in oil spill risk between the two alternatives. Since there are no oil import ports or terminals in the Alaskan Arctic program area, the No Action Alternative would eliminate the risk from OCS sources without introducing any risk from oil tankers. It is important to keep in mind, however, that a reduction in the risk of oil spills from OCS production redistributes, rather than totally eliminates, the spill risk. As Table 4.5.7-2 shows, the Atlantic and Pacific coasts could each be exposed to an additional import tanker spill occurrence along these coasts under the No Action Alternative, whereas these areas would have no exposure to oil spill risk from OCS activities under the proposed action.

TABLE 4.5.7-2 Projected Large Spill Occurrences under the No Action Alternative

Planning Area	Volume of Oil at Risk for Spill[a] (Bbbl)		Change in Spill Occurrence under the No Action Alternative[a]
	Proposed Action	Oil Imports	
Atlantic Coast	0	1.3	
North Atlantic	0	0.6	+1
Mid-Atlantic	0	0.5	
South Atlantic	0	0.1	
Straits of Florida	0	0.1	
Total Atlantic Coast	0	1.3	+1
Gulf of Mexico	4.1	2.7	
Central GOM	3.2	0.7	–2
Western GOM	0.8	1.9	1
Eastern GOM	<0.1	<0.1	0
Total GOM	4.1	2.7	-1
Pacific/South Alaska Coasts	0	1.6	
Southern California	0	0.4	+1
Central California	0	0.5	
Washington/Oregon	0	0.4	
Gulf of Alaska	0	0.2	
Shumagin	0	0.1	
Total Pacific/South Alaska Coasts	0	1.6	+1
Alaska Program Areas			
Cook Inlet	0.2	0.1	0
Arctic	1.6	0	–2
Alaska Program Area	1.8	0,01	-2

[a] OCS spill rate calculated as platform spill rate (0.25 spills/Bbbl) plus the pipeline spill rate (0.88 spills/Bbbl) since spills could occur at the platform or during transport. The tanker spill rate was calculated as 0.34 spills/Bbbl in lower 48 and 0.46 spills/Bbbl in Alaska.

Routine Operations. Routine OCS operations, such as installing offshore facilities and pipelines, transporting materials and personnel from the coast to offshore, and conducting seismic surveys, are associated with impact factors that could have potential environmental effects. The effects of noise, collisions with service vessels, air emissions, drilling and production discharges, and other impact factors associated with OCS activities were analyzed in Section 4.4 of this draft PEIS. With no new OCS activity occurring under the No Action Alternative, the potential for impacts from these factors would be eliminated within the program areas considered in the proposed action. The elimination of potential impacts in these program

areas could redistribute a range of other environmental impacts that would result from the development and transportation of energy substitutions. These impacts could occur on or near the OCS, or elsewhere. While insufficient data are available for quantification of these substituted impacts, some issues of particular environmental concern from energy substitutions are listed below.

Acid Mine Drainage from Coal Mining. Runoff from coal mining sites may increase the acidity of surface waters near and downstream from coal mining sites, adversely affecting habitat for aquatic organisms and limiting human recreational uses.

Contamination of Groundwater from Oil and Gas Extraction. The extraction of oil and gas from onshore sources can, in some cases, lead to the contamination of local groundwater supplies. For example, focusing on shale gas extracted from wells in Pennsylvania and New York, Osborn et al. (2011) found that average methane concentrations in drinking water wells increased with proximity to the nearest gas well and were 17 times greater than wells not located near extraction sites (Osborn et al. 2011). In addition, oil and gas wells may lead to groundwater contamination from accidental spills, losses of well control, and/or pipeline leaks.

Water Discharges from Oil and Gas Operations.[21] To facilitate resource extraction from subsurface formations, oil and gas producers use water to develop pressure, causing oil and gas to rise to the surface (e.g., enhanced oil recovery and hydraulic fracturing). Producers must manage these waters as well as waters extracted from geologic formations during oil/gas extraction. The environmental impacts associated with this "produced water" vary based on the geologic characteristics of the reservoir that produced the water and the separation and treatment technologies employed by producers.

Coal Combustion Impacts. Coal consumed in place of gas under the No Action Alternative will result in environmental costs associated with diminished air quality and the disposal of coal combustion residuals. The combustion of coal in power plants or industrial boilers produces higher emissions of NO_X, SO_X, and PM than the combustion of natural gas and results in greater CO_2 emissions.[22] In addition, coal combustion residuals generated by power plants or coal-fired industrial boilers may pose a risk to local groundwater supplies when disposed in surface impoundments or landfills when such units are not properly maintained.

Socioeconomic and Sociocultural Effects. Sections 4.4.9.1 and 4.4.13.1 describe the effects of the proposed action on socioeconomic and sociocultural conditions, respectively, in the GOM. OCS oil- and gas-related activities have been an important source of employment and income in GOM coastal areas. According to Henry et al. (2002), the nature of blue-collar jobs in the oil and gas industry has been instrumental in the formation and persistence of Cajun culture in South Louisiana. The No Action Alternative would result in reduced employment and income opportunities and potentially could affect the stability and cohesion of communities and cultures. The No Action Alternative could also be interpreted as a boom-bust event. The infrastructure

[21] This discussion is based on USEPA (2008).

[22] For detailed emissions data for power plants, see USEPA (2010d).

and population of affected areas in the GOM have developed over decades in association with a regular occurrence of lease sales and resulting OCS activities. The No Action Alternative could result in situations in which local infrastructure and populations could not be maintained, resulting in out-migration and a reduction in public services. Furthermore, the No Action Alternative's disruption of a continuous process of activity in the GOM could affect future investments which would compound the social, economic, and cultural effects associated with the No Action Alternative.

Conclusion. No potential impacts from routine operations or from accidental discharges described in Section 4.4 would occur under the No Action Alternative. Most of the oil that was projected to be developed in the Arctic under the Proposed Action would be replaced by tanker imports that would offload at U.S. ports, none of which are located within the arctic area. Under the NAA, arctic program areas would therefore not receive any impacts from the Program or from energy substitutions such as tankering. The spill risk associated with replacing the lost OCS Arctic oil production would be transferred to other Planning Areas along the Atlantic, GOM, and Pacific coasts where increases in oil imports and associated risks of tanker spills would occur. The Pacific and Atlantic coasts would each be exposed to the risk of one additional tanker spill under the NAA. About two-thirds of the lost OCS production in the GOM would be replaced by tanker imports into GOM terminals. The spill risk from tankering would be greater in the Western GOM Planning Area than in the Central GOM based on the location of terminals. There would be effects of the NAA on socioeconomic conditions in the GOM and potential effects on community cohesion and levels of public services available there. The potential risk from impacts associated with routine OCS operations and activities removed under the NAA would be transferred to other areas within and beyond the OCS where energy substitutes such as imported and onshore oil and gas, and coal would be developed and transported.

4.6 ENVIRONMENTAL IMPACTS OF THE CUMULATIVE CASE

4.6.1 Cumulative Case Scenario

Cumulative effects are the impacts on the environment that result from the incremental impact of the proposed action when added to other past, present, and reasonably foreseeable future actions regardless of what agency, industry, or person undertakes the other actions. The cumulative analyses presented in this chapter evaluate OCS activities associated with the Program (the proposed action), as well as activities resulting from other past and future 5-yr OCS programs that could occur over the next 40 to 50 yr. It is reasonable to analyze cumulative impacts in the context of the proposed action (Alternative 1) because of all the action alternatives, it proposes the most geographically extensive lease sale scenario under the Program (and presumably, the most extensive potential impacts). The cumulative analyses also evaluate impacts from activities and processes that are not related to OCS development. These activities and processes will be identified in the following analyses where they apply. There are some activities and processes, however, that are pandemic actions (oil and gas programs in State waters and imported oil), emerging trends affecting multiple-use issues on the OCS (alternate energy), or phenomena that could affect the regional geophysical environment (climate change).

Because these activities have widespread importance as potential cumulative impacting factors, we describe them in this section to provide a framework for their inclusion in the appropriate cumulative analyses.

4.6.1.1 OCS Program Oil and Gas Activities

Tables 4.6.1-1 and 4.6.1-2 show the numeric estimates for all OCS program activities for the GOM and Alaska, respectively, that could occur on the OCS over the next 40 to 50 yr. These estimates include activities that will be part of the Program, as well as those from previous and future 5-yr programs. It should be noted that the cumulative scenario for the arctic planning areas reflects inherent uncertainty about the future of OCS oil and gas activities. To date, there have been no activities on the arctic OCS due largely to operational issues related to the extreme environmental conditions as well as legal issues associated with approving activities in the region. Table 4.6.1-2 presents the exploration and development scenarios for the cumulative case and the proposed action for Alaska; the values for the cumulative case reflect a small increase in activity in Alaska as a result of future leasing beyond the Program. These values are for analytical purposes only and are not intended as forecasts of future activity. At this time, future activity is unpredictable and could span a considerable range. Transportation and other scenario assumptions that were used in the proposed action explanation and development scenario and impact analyses (Section 4.4.1) also apply to the cumulative analyses.

Estimates of the assumed numbers of large and small oil spills that could result from all OCS oil and gas activities are presented in Table 4.6.1-3. The source and number of assumed OCS spills were based on the volume of anticipated oil production in each region, the assumed mode of transportation (pipeline and/or tanker), and the spill rates for large spills. Assumptions regarding the number of large oil spills from import tankers were based on the estimated level of crude oil imports and worldwide tanker spill rates. We assume that these spills would occur with uniform frequency over the life of the proposed action.

There are currently a total of 29,097 lease blocks in the GOM OCS Planning Areas; of these, 7,800 are active (Section 4.4.1.1). Shallow-water oil production in the GOM OCS has been in decline since 1997, and is expected to be offset by deepwater production over the life of the proposed action. Over the next 5 yr, BOEM projects that GOM OCS oil production will exceed 1.7 Mbbl/day (620 Mbbl annually). Gas production is expected to increase, then level off to about 8 Bcf/day (2,920 Bcf annually) (Karl et al. 2007).

The Cook Inlet Planning Area has had oil and gas operations in State waters since the late 1950s and currently has a well-established oil and gas infrastructure. The most recent sale in which leases were purchased occurred in 1997 (when two leases were purchased). A lease sale was held in 2004, but no leases were purchased (Section 4.4.1.2). There are currently no existing OCS activities in Cook Inlet.

There has been no oil and gas development activity in the arctic Program areas. Since 1979, 10 lease sales have been held in the Beaufort Sea Planning Area and three in the Chukchi Sea Planning Area, but no activity has resulted to date (Section 4.4.1.3).

TABLE 4.6.1-1 Offshore Exploration and Development Scenario for the OCS Program GOM Cumulative Case and Proposed Action[a]

Scenario Elements	Cumulative Case	Proposed Action
Years of activity	40–50	40–50
Oil (Bbbl)[b]	18–26	2.7–5.4
Gas (Tcf)[c]	76–112	12–24
Platforms	1,400–2,000	200–450
FPSOs[d]	1–6	0–2
No. of exploration and delineation wells	6,900–9,800	1,000–2,100
No. of development and production wells	8,500–12,000	1,300–2,600
Miles of pipeline	19,000–43,000	2,400–7,500
Service vessel trips/week	1,400–1,900	300–600
Helicopter trips/week	12,000–24,000	2,000–5,500
New pipeline landfalls	0–40	0–12
New natural gas processing facilities	0–14	0–12
Platforms removed with explosives	870–1,200	150–275
Drill Muds/Well (tons)		
Exploration and delineation wells	1,000	1,000
Development and production wells	1,000	1,000
Drill Cuttings/Well (tons)		
Exploration and delineation wells	1,200	1,200
Development and production wells	1,200	1,200
Produced Water/yr (Mbbl)[e]		
Oil well	19,000–27,000	73–140
Natural gas well	161–247	26–52
Bottom Area Disturbed (ha)[f]		
Platforms	960–12,000	150–2,500
Pipeline	9,500–69,000	2,000–11,500

[a] Values for the cumulative case represent the proposed action (under the 2012 to 2017 OCS program) and actions associated with ongoing and future OCS program oil and gas activities.

[b] Bbbl = billion barrels.

[c] Tcf = trillion cubic feet.

[d] FPSOs = floating, production, storage, and offloading systems.

[e] Based on 1.04 bbl produced water/bbl of oil, and 86 bbl produced water/1 Mcf gas (Clark and Veil 2009); Mbbl = million barrels. Calculations based on the total volume of oil or gas produced; actual discharges at a well are highly variable depending on geologic formation and age of well.

[f] Assumes 0.7–6 ha (1 ac) per platform and 0.5–1.6 ha (1.2–2.5 ac) per mile of pipeline.

TABLE 4.6.1-2 Offshore Exploration and Development Scenario for the OCS Program Alaska Cumulative Case and Proposed Action[a]

	Arctic Region				South Central Alaska Region	
	Beaufort Sea		Chukchi Sea		Cook Inlet	
Scenario Elements	Cumulative Case	Proposed Action	Cumulative Case	Proposed Action	Cumulative Case	Proposed Action
Years of activity	40–0	40–50	40–50	40–50	40–50	40–50
Oil (Mbbl)[b]	500–1,350	200–400	1,500–7,700	500–2,200	100–200	100–200
Gas (Tcf)[c]	0–7.0	0–2.2	0–31	0–8.0	0–0.68	0–0.68
Platforms	2–12	1–4	3–20	1–5	1–3	1–3
No. of exploration and delineation wells	12–48	6–16	12–66	6–20	6–12	6–12
No. of platform production wells	90–375	40–120	180–1,100	60–280	42–110	42–110
No. of subsea production wells	20–30	10	54–290	18–82	0	0
Miles of new offshore pipelines	50–520	30–155	150–1,300	25–250	25–150	25–150
Miles of new onshore pipelines	40–375	10–80	250–750	0	50–105	50–105
Service vessel trips/week[d]	1–18	1–12	1–23	1–15	1–3	1–3
Helicopter trips/week	1–18	1–12	1–23	1–15	1–3	1–3
New pipeline landfalls	0	0	0	0	0–1	0–1
New shore bases	0	0	0	0	0	0
New waste facilities	2–4	0	2–4	0	0	0
New natural gas processing facilities	2–4	0	2–4	0	0	0
Docks/causeways	2–4	0	2–4	0	0	0
Exploration well muds, cuttings, produced water	425 tons dry mud with 80% recycled; 525 tons dry rock cuttings, totaling 610 tons discharged at each well site.		425 tons dry mud with 80% recycled; 525 tons dry rock cuttings, totaling 610 tons discharged at each well site.		360 tons dry mud, with 80% recycled; 450 tons dry rock cuttings; totaling 522 tons per site.	
Development wells muds, cuttings, produced water	All muds, cuttings, and produced water treated and disposed of in wells.		All muds, cuttings, and produced water treated and disposed of in wells.		All muds, cuttings, and produced water discharged down hole.	
Bottom Area Disturbed (ha)[e]						
Platforms	1–72	1–24	2–180	1–30	1–18	1–18
Pipelines[f]	25–830	15–250	75–2,100	13–400	13–240	13–240

TABLE 4.6.1-2 (Cont.)

	Arctic Region				South Central Alaska Region	
	Beaufort Sea		Chukchi Sea[a]		Cook Inlet	
Scenario Elements	Cumulative Case	Proposed Action	Cumulative Case	Proposed Action	Cumulative Case	Proposed Action
Surface Soil Disturbed (ha)						
Pipeline	20–600	5–130	130–1,200	0	25–170	25–170

[a] Values for the cumulative case represent the proposed action (under the 2012 to 2017 OCS program) and actions associated with ongoing and future OCS program oil and gas activities. Because no OCS program oil and gas activities other than those associated with the 5-yr 2012–2017 OCS program are anticipated in the Cook Inlet Planning Area, the cumulative case scenario for the Cook Inlet Planning Area is the same as for the proposed action.

[b] Mbbl = million barrels.

[c] Tcf = trillion cubic feet.

[d] In the Arctic region, service vessel trips will only occur during open-water and broken-ice conditions (typically during August and September).

[e] Assumes 0.7–6 ha (1.7–15 ac) per platform and 0.5–1.6 ha (1.2–4.0 ac) per mile of pipeline.

[f] Value represents bottom area disturbance from offshore pipeline construction only.

TABLE 4.6.1-3 Large and Small Oil Spill Assumptions for the Cumulative Case

		Number of Spill Events[a]		
			Arctic Region	South Alaska Region
Scenario Elements	Assumed Spill Volume	Gulf of Mexico Region	Beaufort and Chukchi Seas	Cook Inlet
Oil Production (Bbbl)[b]		18–26	2–6	0.1–0.2
Large (bbl)	≥1,000			
Pipeline	1,700[c]	16–23	1–6	1 spill from either
Platform	5,000[d]	4–7	1–2	
Tanker	3,100–5,800[e]	5–10		
Small (bbl)[f]	≥50 to <1,000	230–330	25–80	1–3
	≥1 bbl to <50	1,350–1,950	150–450	7–15

[a] The assumed number of spills are estimated using the 1996–2010 spill rates in Anderson (in preparation). For the Alaska OCS region, the 1996–2010 spill rates were compared to fault-tree rates in Bercha Group, Inc. (2008a, b, 2006). The greater number of spills from Anderson (in preparation) is represented in Table 4.4.2-1. The values provided for the Arctic region are the combined totals for the Beaufort and Chukchi Seas.

[b] Bbbl = billion barrels.

[c] During the last 15 years (1996–2010), 7 oil spills ≥1,000 bbl occurred from U.S. OCS pipelines. The median spill size was 1,720 bbl. The maximum spill size between 1996 and 2010 from U.S. OCS pipelines was 8,212 bbl.

[d] During the last 15 years (1996–2010), 2 oil spills ≥1,000 bbl occurred from U.S. OCS platforms. During Hurricane Rita, one platform and two jack-up rigs were destroyed, and a combined total of 5,066 bbl were spilled. The median spill size, when not accounting for a decreasing trend in the rate of platform spills over 1964–2010, is 7,000 bbl. The low-probability very large spill occurrence, such as the DWH event, is represented as a catastrophic spill event.

[e] 3,100 bbl for tankers in the GOM; 5,800 bbl for TAPS tankers transporting Alaska OCS oil.

[f] The number of spills <1,000 bbl is estimated using a spill rate for both pipeline and platform spills.

4.6.1.2 Non-OCS Program Oil and Gas Activities

4.6.1.2.1 Offshore and Coastal Oil and Gas.

Gulf of Mexico. All the GOM States except Florida[23] have active oil and natural gas programs in both offshore State waters and on coastal lands. In 2009, oil and natural gas produced in GOM State waters totaled 503 million barrels (Mbbl) and 114 Bcf, respectively

[23] A drilling moratorium in Florida State waters has been in effect since July 1990 and there has been no leasing of tracts since the early 1980s (Lloyd et al. 1991).

(EIA 2010a, b). Offshore State oil and gas activity levels are highest in Texas and Louisiana, a long-established trend that will likely continue through the life of the Program.

Crude oil production in Texas has a long history, but has declined over the past decade (from approximately 449 Mbbl in 1999 to 404 Mbbl in 2009). During the same period, its offshore production increased from 475,000 to 897,000 bbl (EIA 2000, 2010a). From 2005 to 2009, the State's offshore gas withdrawals (from gas and oil wells) totaled 38 Bcf (EIA 2010b). Louisiana's offshore program produced 5.5 Mbbl of crude oil in 2009; from 2005 to 2009, its offshore gas withdrawals totaled 76 Bcf (EIA 2010a, b).

Although Mississippi ranked eleventh in the nation in both crude oil and natural gas production in 2009 (EIA 2010a, b), the State does not currently have an offshore program. Alabama did not produce crude oil from offshore waters in 2009; however, from 2005 to 2009 its offshore gas withdrawals totaled 109 Bcf (EIA 2010b).

Alaska. The Beaufort Sea and Cook Inlet are the only areas in Alaska with producing offshore leases. About 92% of Alaska's oil production takes place on the North Slope, and as of 2009 about 16,200 Mbbl of oil[24] have been produced from North Slope oil fields. Oil produced from the North Slope (including Beaufort Sea) is transported down the TAPS pipeline to Valdez, Alaska, where it is loaded onto tankers and exported. Significant volumes of natural gas (a net[25] of about 6.5 Tcf) have been produced along with oil recovery in North Slope fields; much of this gas has been reinjected into reservoirs (ADNR 2009c).

We assume that the North Slope fields will continue to account for most of Alaska's production during the life of the proposed action, although projections from the State of Alaska anticipate a 60% production decline by 2021 (ADNR 2000). Remaining North Slope oil reserves through 2050 are estimated by the State of Alaska to be about 5,200 Mbbl (ADNR 2009c). Over this period, almost half of the oil produced is expected to come from the Prudhoe Bay oil field (2,450 Mbbl) (ADNR 2009c). Natural gas reserves of 35 Tcf have been discovered within existing North Slope oil fields, with 93% located in four fields: Prudhoe Bay (23 Tcf), Point Thomson (8 Tcf), Lisburne (1 Tcf), and Kuparak (1 Tcf) (EIA 2009q). About 3.7 Tcf of natural gas from these reserves has been produced. This gas has been used as a fuel for facilities or has been reinjected into the hydrocarbon reservoir to enhance oil recovery.

There are also some leases in the Cook Inlet Planning Area. As of 2009, about 1,300 Mbbl of oil and 7,800 Bcf of natural gas (net) have been produced from reserves in Cook Inlet. Remaining reserves (including oil and natural gas liquids) through 2034 are estimated to be about 34 Mbbl, with annual production declining from 3.4 Mbbl in 2010 to about 0.52 Mbbl in 2034 (ADNR 2009c).

[24] Historic figures include both oil and natural gas liquids produced at Prudhoe Bay and surrounding fields.

[25] Net gas production is the difference between total gas injected (to enhance oil recovery) and total gas recovered.

4.6.1.2.2 Other Federal and Canadian Arctic Activities. The National Petroleum Reserve in Alaska (NPR-A) is a 9.3-million-ha [23-million-ac] site on the North Slope of Alaska that is managed by the BLM. The USGS has estimated that there is between 1.3 and 5.6 Bbbl and 39.1 and 83.2 Tcf of natural gas on Federal lands within the NPR-A. Integrated activity plans have been developed by BLM (2004, 2006a) that identify the lands within the NPR-A available for leasing, as well as those restricted from leasing, and identify stipulations and restrictions on surface activities in the lease areas of the NPRA. To date, there have been four lease sales in the NPR-A (in 1999, 2002, 2004, and 2006), and as a result of these sales, the BLM currently administers 381 Federal oil and gas leases on the NPR-A. To date, no production wells have been established in the NPR-A, although 23 exploration wells have been drilled within the reserve since 2000, and as many as an additional 11 exploration wells may be established by 2011 (BLM 2006b). It is uncertain at this time whether or not production facilities will be established within the NPR-A during the life of the Program.

Northern Canada contains about a quarter of Canada's remaining discovered resources of conventional petroleum and a third to a half of the country's estimated potential (Northern Oil and Gas Directorate 2007). This resource is distributed throughout northern Canada as follows:

- *Mackenzie Valley and onshore Yukon.* Twenty-six significant discoveries and three producing fields: the Norman Wells oil field produces oil at rates of 30,000 bbl per day (6.294 bbl = 1 m^3) with initial recoverable reserves of 235 Mbbl; the Kotaneelee and Pointed Mountain fields close to the British Columbia-Alberta border had produced 417 billion ft^3 (35.3 ft^3 = 1 m^3) of gas by the end of 1997.

- *Arctic Islands.* Nineteen significant discoveries after fewer than 200 exploration wells; the Bent Horn field in the Arctic Islands, which produced high-quality light oil for many years on a seasonal basis, has only recently been abandoned.

- *Mackenzie Delta/Beaufort Sea.* Discovered resources of in excess of 1 Bbbl of oil and 9 Tcf of gas in 53 significant discoveries. Four Tcf of marketable gas have been discovered in three onshore discoveries, and offshore discoveries include over 200 Mbbl in the Amauligak field. On the Mackenzie Delta, the Ikhil gas discovery is being developed to supply natural gas to the town of Inuvik, where it will replace imported diesel oil for power generation and domestic use.

4.6.1.2.3 Imported Oil. U.S. imports of crude oil and petroleum products grew steadily every year from 1981, when the annual total was 2.2 Bbbl, to a peak in 2005, when the annual total was 5.0 Bbbl. Since 2005, imports have been in decline, dropping to an annual total of 4.3 Bbbl in 2009 (its lowest point since 2000). The Gulf Coast district was the largest importer of crude oil, with a total of 1.9 Bbbl in 2009 (EIA 2010, 2011a). The USDOE estimates that crude oil imports will continue to decline from 2009 to 2035 as the growth in demand is met by domestic production (EIA 2011b). Canadian oil imports, representing about 21% of the total in

2009, are delivered by pipeline (EIA 2010a). The remaining oil arrives in the United States on tankers.

4.6.1.3 Mining Activity

Because mining is such a large component of the Alaskan economy (McDowell Group, Inc. 2006) and activity could occur in the future in areas potentially affected by OCS oil and gas activity, we have included a description of other mining activities. Alaska's mining industry includes exploration, mine development, and mineral production, and produces zinc, lead, gold, silver, and coal, as well as construction minerals such as sand, gravel, and rock (Research Development Council 2007). Approximately 73 open-pit, underground, mechanical placer, and suction dredge mines were in production in Alaska in 2005. In addition, there are at least 37 rock quarries and 71 active sand and gravel operations in the State (Research Development Council 2007). Two large mines, the Kensington Gold Project and the Pogo Gold Project, are expected to begin operation in 2007. The three largest mines in Alaska are the Red Dog, Ft. Knox, and Greens Creek mines. The Red Dog Mine, located in the Northwest Arctic Borough, is the world's largest zinc producer.

Among the large active mines currently operating in the State, only the Red Dog Mine is located adjacent to any of the Alaska OCS planning areas addressed in this PEIS. This mine, located in the DeLong Mountains approximately 88.5 km (55 mi) east of the Chukchi Sea, discharges treated water into Red Dog Creek, whose waters eventually feed into the Wulik River and drain into the Chukchi Sea.

In addition to the active and planned mine sites in the State, there are numerous exploration projects for gold, copper, nickel, silver, lead, zinc, and coal. In July 2006, BHP Billiton Energy Coal entered into an exploration agreement with the Arctic Slope Regional Corporation (ASRC) to conduct a 5-yr exploration program on corporation lands in the Northwest Arctic. Coal deposits in the Northwest Arctic run from the Colville River north to the Arctic Ocean. The coal reserves in the area are thought to be the largest coal resource in the United States and one of the largest worldwide, with estimated reserves of 5 billion tons of coal underlying 77,700 km^2 (30,000 mi^2). In early 2009, BHP Billiton suspended all exploration activities, and in the summer of 2009, the company terminated its agreement with ASRC. The company indicated that the decision was based on the current economic situation.

4.6.1.4 Alternate Energy

The Energy Policy Act of 2005 amended Section 8 of the Outer Continental Shelf Lands Act (OCSLA) (43 USC 1337) to give the Secretary of the Interior authority to issue a lease, easement, or ROW on the OCS[26] for activities that are not otherwise authorized by the OCSLA or other applicable law, if those activities:

[26] This excludes areas on the OCS within the exterior boundaries of any unit of the National Park System, National Wildlife Refuge System, National Marine Sanctuary System, or any National Monument.

- Produce or support production, transportation, or transmission of energy from sources other than oil and gas; or

- Use, for energy-related purposes or other authorized marine-related purposes, facilities currently or previously used for activities authorized under the OCSLA, except that any oil and gas energy-related uses shall not be authorized in areas in which oil and gas preleasing, leasing, and related activities are prohibited by a moratorium.

In response to this new authority, the BOEM of the USDOI, formerly the Minerals Management Service (MMS), established an Alternative Energy and Alternate Use Program on the OCS (now referred to as its Renewable Energy Program) to approve and manage these potential activities. The BOEM completed its PEIS to evaluate the potential environmental impacts of implementing the program and established initial policies and best management practices to mitigate these impacts in October 2007 (MMS 2007d). Each project developed under this new program will be subject to environmental reviews under the National NEPA, and each project may have additional project-specific mitigation measures. On April 22, 2009, the BOEM published its final regulations to establish an environmentally responsible Renewable Energy Program on the OCS. Documents and information related to the program can be found at http://www.boemre.gov/offshore/RenewableEnergy/index.htm.

While it is too early to predict the number and types of alternate uses and renewable energy projects that could be developed during the life of the Program, several OCS renewable energy projects have been proposed at the current time. Most of these are wind energy projects. The first commercial wind lease (Cape Wind off the coast of Massachusetts) was signed by the Secretary of the Interior in 2010 and its construction is expected to begin by the end of 2011 (BOEMRE 2011g). Noncompetitive leases for 14 lease areas off the coasts of New Jersey (6), Delaware (1), Georgia (3), and southeast Florida (4) have also been approved. These leases are for data collection and technology testing activities related to the development of wind and ocean current resources (BOEMRE 2011h). None of these leases are within the subject regions for this PEIS.

4.6.1.5 Climate Change

Because a growing body of evidence shows that climate change is occurring (Section 3.3), we have included it as an impacting factor in the cumulative analysis of some resources. The resources that include climate change as a cumulative impact factor meet one or both of the following two criteria:

- The resource is already experiencing impacts from climate change, so the effects are observable and not speculative. In Alaska, for example, the effects of climate change in recent decades have resulted in decreased extent and thickness of sea ice and other changes that could affect biological resources and subsistence.

- The resource will be directly affected by warming temperatures. An example of direct impacts of warming is increased melting of continental ice that leads to accelerated sea-level rise and inundation of coastal wetlands and beaches in the GOM.

We have not analyzed impacts from climatic and hydrologic changes that are the indirect result of temperature change because these indirect impacts are too uncertain to predict. For example, it is reasonable to expect changes in precipitation regimes as a result of climate change. Furthermore, it is also likely that precipitation changes would, in turn, affect the coastal salinity balance between freshwater flow and tidal influence in some areas, and that these changes would affect fisheries and fish populations in some way. Both the magnitude and direction of each factor in this sequence of occurrences, however, are uncertain. While we acknowledge that continuing climate change could result in changing regional ecological and socioeconomic patterns and distributions, at this stage of our understanding of underlying processes, the rates and directions of many of these changes are too speculative to include in the cumulative analyses that follow. A more in-depth discussion of climate change is provided in Section 3.3.

4.6.2 Marine and Coastal Physical Resources

4.6.2.1 Gulf of Mexico Region

4.6.2.1.1 Water Quality. Section 4.4.3 discusses water quality impacts in coastal, continental shelf, and deepwater environments in the GOM resulting from the proposed action (OCS program activities from 2012 to 2017). Cumulative impacts on water quality result from the incremental impacts of the proposed action (described in Section 4.4.3) when added to impacts from existing and reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities. Table 4.6.1-1 presents the exploration and development scenario for the GOM cumulative case (encompassing the proposed action and other OCS program activities). Non-OCS program activities contributing to adverse cumulative impacts on water quality in the GOM are summarized in Table 4.6.2-1.

Ongoing and future routine OCS program activities, including those of the proposed action, involve vessel traffic, well drilling, pipelines (trenching, landfalls, and construction), chemical releases (drilling, operation discharges, and sanitary wastes), platforms (anchoring, mooring, and removal, except in deep waters), and onshore construction (coastal waters only). All of these have the potential to adversely affect water quality in the GOM. Accidental oil spills are also counted among OCS program-related activities; assumptions for oil spills under the cumulative case scenario are provided in Table 4.6.1-3.

OCS program-related marine vessel traffic in the GOM could be as high as 1,900 trips per week over the next 40 to 50 yr; vessel traffic associated with the proposed action (600 trips per week) represents about 30% of this traffic. Extensive non-OCS program marine traffic also

TABLE 4.6.2-1 Ongoing and Reasonably Foreseeable Future Non-OCS Activities Contributing to Cumulative Impacts on Water Quality

Type of Action	Associated Activities and Facilities (Impacting Factors)	Description
Marine vessel traffic	Discharges of bilge water and waste Accidental oil spills	Marine traffic includes crude oil and LNG tankers, commercial container vessels, military and USCG vessels, cruise ships, commercial fishing, and small watercraft. In 2009, a total 18,956 vessel calls were made in GOM ports, comprising about 34% of all U.S. vessel calls; U.S. vessel calls overall have been in decline in recent years (down 7% in 2009 from 5 yr earlier) (USDOT 2011b). It is estimated that about 60% of all crude oil imports into the United States are delivered by tanker ships entering through the GOM (VesselTrax 2007). See Section 4.6.1.2.2 on imported oil.
Wastewater discharge to coastal and marine waters	Permitted discharge points Pollutant releases via surface runoff (non-point discharges)	The major point sources of pollution include discharges (by discrete conveyances such as pipes or man-made ditches) from sewage treatment plants, industrial facilities, and power generating plants. Discharges are regulated through the NPDES permit program. Section 403 of the Clean Water Act (CWA) established the Ocean Discharge Criteria, which provide additional requirements for these types of discharges (USEPA 2011g). Non-point sources of pollution include rainfall, snowmelt, or irrigation water that runs over land or through the ground, entraining pollutants and depositing them into rivers, lakes, and coastal waters (including wetlands and estuaries). Pollutants such as fertilizers, herbicides, and insecticides; oil, grease, and toxic chemicals; sediment; and bacteria and nutrients can make their way to coastal waters and have harmful effects on drinking water supplies, recreation, fisheries, and wildlife. Non-point source management programs under Section 319 of the CWA regulate these pollutant sources. The USEPA and NOAA also co-administer State Coastal Non-Point Pollution Control Programs under Section 6217 of the Coastal Zone Act Reauthorization Amendments of 1990 (USEPA 2011g).

TABLE 4.6.2-1 (Cont.)

Type of Action	Associated Activities and Facilities (Impacting Factors)	Description
		Excess nutrients (particularly nitrogen and phosphorus) released to the GOM have created an oxygen-depleted zone (the hypoxic zone) at the bottom of the continental shelf off Louisiana and Texas that is harmful to aerobic organisms. The USEPA predicts that the hypoxic zone will cover an average area of 24,400 km^2 (9,420 mi^2) in the summer of 2011, the largest area recorded since systematic mapping of the zone began. The hypoxic zone is attributed to the discharge of excess nutrients (from agricultural runoff) carried to the GOM from the Mississippi River and stratification (due to salinity and temperature differences across the water column) that prevents mixing of water (USEPA 2011f).
Dredging and marine disposal	Excavation of subaqueous sediments Transport of sediments (by dredger or pipeline) Relocation and disposal of sediments	The USEPA is responsible for designating and managing Ocean Dredged Material Disposal Sites as authorized by the Marine Protection, Research and Sanctuaries Act. Permits for ocean dumping of dredged materials are granted by the USACE, subject to USEPA review and concurrence, as authorized by Section 404 of the CWA (USEPA 2011c). There are currently 27 designated ocean dredged material disposal sites in the GOM, including 21 off the coast of Texas and Louisiana and in the Mississippi River GOM outlet (USEPA Region 6) and six off the coasts of Mississippi, Alabama, and Florida (USEPA Region 4) (USEPA 2011d, e). The largest quantities of disposed materials come from dredging of the Mississippi River bar channel (USACE 2011).

TABLE 4.6.2-1 (Cont.)

Type of Action	Associated Activities and Facilities (Impacting Factors)	Description
Liquefied \natural gas (LNG) terminals	Construction and operation of new LNG facilities on the OCS Increased risk of explosions and fires Increased LNG tanker traffic Cooled water releases	The United States is an importer and exporter of natural gas (EIA 2010b). The USDOE projects a significant increase in overall natural gas consumption between 2009 and 2035; estimates of LNG imports over this period are variable, ranging from 140 to 2,140 Bcf by 2035 (EIA 2011b). The United States currently operates five LNG import terminals, only one of which is located offshore (Gulf Gateway Deepwater Port off the coast of Louisiana). It is reasonably foreseeable that additional LNG terminals will be constructed in the GOM to offload LNG from tankers into the existing offshore natural gas pipeline system. Currently in the GOM, there are 16 applications for licenses to import LNG (seven licenses have been issued) (USDOT 2011a). See Section 4.3.1.1.2.
Oil and gas production in State-owned marine waters	Exploratory drilling and seismic testing Drilling of production wells Operation of infrastructure (pipelines and platforms) Transportation (by pipeline or tanker) Onshore refineries Hazardous spills/releases (e.g., loss of well control events) Decommissioning (plugging production wells and removing infrastructure)	Most of the historical production of oil and natural gas in State-owned marine waters in the GOM has occurred offshore of Texas and Louisiana. See Section 4.6.1.2.1.

TABLE 4.6.2-1 (Cont.)

Type of Action	Associated Activities and Facilities (Impacting Factors)	Description
Hard mineral mining	Vessel traffic Bottom sampling and shallow coring Mining	Hard minerals, such as quartz sand, sulfur, and sand, are currently being extracted for commercial purposes in the northern part of the GOM. Mineral resource deposits within coastal waters include phosphate, oyster shell, limestone, sand and gravel, and magnesium (Continental Shelf Associates 2004d). Mining from the cap rock of coastal and offshore salt domes has been active along the Texas–Louisiana coast since the 1890s (Kyle 2002). Currently, the Main Pass Block 299 mine, operated by Freeport-McMoRan, is leased to mine sulphur and salt in Federal waters of the GOM (lease OCS-G9372). The mine is located about 26 km (16 mi) offshore, east of Plaquemines Parish, Louisiana. It was closed in 2002 and proposed to be used as a disposal facility for exploration and production waste (67 FR 5847).
Oil- and gas-related infrastructure	Ports Oil and gas pipelines Tanker vessels Onshore fuel storage tanks and transfer stations Hazardous spills/releases	The oil and gas industry in the GOM is one of the most developed in the world. There are currently 3,172 active platforms in operation at water depths less than 61 m (200 ft) and 63 active platforms at water depths greater than 61 m (200 ft) (26 of which are in waters greater than 300 m [1,000 ft] deep). An estimated 41,843 km (26,000 mi) of oil and gas pipeline stretches across the seafloor. As of July 2011, there were more than 37,000 approved applications to drill in the GOM (BOEMRE 2011j; NOAA 2011c).
USDOD and U.S. Department of Homeland Security marine operations	Surface vessels Aircraft Aerial operations (e.g., flight training) Submarine operations	Numerous U.S. military bases are located along the GOM coast (see Section 4.3). Several U.S. Navy air stations serve as training bases in jet aviation, sea and air rescue, and coastal mine countermeasures, as well as home ports for various ships and operations. Some support U.S. Army and USCG activities. The USCG (part of the U.S. Department of Homeland Security) conducts routine missions, such as search, rescue, environmental protection, and homeland security on sea vessels and aircraft. The U.S. Air Force conducts training activities over the deepwater region of the GOM.

TABLE 4.6.2-1 (Cont.)

Type of Action	Associated Activities and Facilities (Impacting Factors)	Description
Renewable energy development	Wind, wave, and ocean current technologies Technology testing (bottom sampling, deep-tow sonar surveys, borings) Facility construction and operation Facility decommissioning (removal of facility)	To date, the United States has no offshore renewable energy projects, but the first commercial wind lease (Cape Wind off the coast of Massachusetts) was signed by the Secretary in 2010. See Section 4.3.1.1.3.

occurs in the GOM, one of the world's most concentrated shipping areas (USACE 2010). Non-OCS program traffic includes that related to crude oil and natural gas imports, commercial container vessels, military and USCG vessels, cruise ships, commercial fishing, and small watercraft. In 2010, the Port of New Orleans alone handled about 7,500 vessel calls (mainly tanker and dry bulk carrier), about 140 vessel calls per week (USDOT 2011b). Impacts on water quality from marine traffic arise from regular discharges of bilge water and waste, leaching of antifouling paints, and incidental spills (MMS 2001d), although operational discharges and spillage from marine vessels have declined substantially in the past few decades (NRC 2003b).

The number of production wells and oil platforms constructed over the period of the Program (at most 2,600 and 450, respectively) will be proportional to the amount of oil produced; these numbers represent about 21% of the total number of production wells and platforms (respectively) anticipated to be built in the GOM over the next 45 yr as part of the OCS program. The length of new pipeline (at most 12,070 km [7,500 mi]) added as part of the Program represents about 17% of that anticipated as part of the OCS program.

The area of disturbed sea bottom from construction of platforms and pipelines over the period of the Program (as much as 14,000 ha [34,600 ac] total) represents about 18% of that associated with the OCS program over the next 40 to 50 yr. Bottom disturbance degrades water quality by increasing water turbidity in the vicinity of the operations and adding contaminants to the water column. It also changes sediment composition as suspended sediments (and contaminants, if present) are entrained in currents and deposited in new locations.

An inventory conducted by NOAA found that there were about 766 major and 8,147 minor land-based point sources of pollution releasing to watersheds and coastal drainage areas of the GOM; these included discharges from industrial facilities (6,909), wastewater treatment plants (1,925), and power plants (79) — most of which were located in the watersheds of the Atchafalaya/Vermilion Bays and Galveston Bays at the time of the inventory (NOAA 1995). The kinds of contaminants released range from nitrogen (from organic chemicals, petroleum refining, industrial plants, and pesticide sources), phosphorus, metals (zinc, arsenic, cadmium, lead, and mercury), and oil and grease, to elevated suspended solids (turbidity) and biocides and heat (from power plant cooling water discharges). Nonpoint sources release pollutants to the GOM via rivers and on-land drainages and are primarily from urban and agricultural runoff (containing animal waste and residual fertilizer, in particular nitrogen and phosphorous compounds), but also originate from seepage from landfills and industrial facilities and various kinds of on-land spills. These sources (together with similar sources from Mexico) combine to degrade water quality in the GOM, especially in coastal waters. Coastal water quality is also adversely affected by the loss of wetlands (Section 3.7.1).

Activities taking place within GOM waters also contribute to the degradation of water quality in the GOM. These include sediment dredging and disposal (suspended sediments and contaminants), LNG terminal operations (biocide-laden, cooled water), and activities related to the oil and gas industry, which operates hundreds of platforms in State and Federal waters and discharges large volumes of drilling wastes, produced water, and other industrial waste streams into GOM waters. Hydrocarbon releases through natural oil seeps along the continental slope and accidental oil spills are additional sources of water and sediment contamination.

There are 27 designated ocean dredged material disposal sites in the GOM, including 21 off the coast of Texas and Louisiana and in the Mississippi River GOM outlet. Dredging operations are routinely conducted for channel construction and maintenance, pipeline emplacement, access to support facilities, creation of harbor and docking areas, and siting for onshore facilities. Offshore disposal, authorized under Title I of the Marine Protection, Research and Sanctuaries Act of 1972, as amended (33 USC 1401), and the Federal Water Pollution Control Act, as amended (33 USC 1251), consists primarily of dredged sediments but may also include fish wastes and vessels. The site management and monitoring plans for many of these sites are available on the USEPA's website (http://www.epa.gov). The USACE maintains an online database that tracks the projects (including quantities of materials, dredging and transport methods, and dumping frequency, size, and location) that dispose of materials at designated offshore disposal sites (http://el.erdc.usace.army.mil/odd). The direct impacts of dredging on water quality (increased turbidity and decreased dissolved oxygen at the dredge site) are fairly short lived; however, the long-term landscape-scale changes can have significant adverse impacts on aquatic organisms and their habitats (Nightingale and Simenstad 2001) (Sections 4.6.3 and 4.6.4).

Currently, there is only one offshore LNG terminal in the GOM (Gulf Gateway Deepwater Port off the coast of Louisiana). However, natural gas demand growth in the United States has accelerated since the 1980s, and LNG imports are expected to increase significantly to meet this demand. As a result, 25 LNG terminal proposals have been approved to serve the U.S. market (Parfomak and Vann 2009). At least seven new licenses have been issued for additional facilities in the GOM, and it is anticipated that more LNG facilities will be built over the coming decades (USDOT 2011c) (Section 4.6.1.5). The impacts of LNG transport and LNG receiving terminals are associated with explosions and fires and with the cryogenic and cooling effects of either an accidental release of LNG or the release of cooled water during the vaporization process.

The majority of oil released to the GOM comes from chronic releases, mainly from naturally occurring seeps and runoff from land-based sources (NRC 2003b). Oil seeps are estimated to contribute up to 62% of the oil input in U.S. marine waters overall; runoff from land-based sources, about 21% (NRC 2003b). As many as 350 crude oil and tar seeps have been identified in the GOM. Seepage rates for the northern part of the GOM (along the continental slope) have been estimated at about 73,000 tons (526,000 bbl) per year,[27] about twice that estimated for spills from the OCS program (based on a worst-case scenario of about 230,000 bbl per year, excluding catastrophic events; Table 4.6.2-3). Spills associated with the proposed action (based on a worst-case scenario of about 44,300 bbl per year, excluding catastrophic events (Table 4.4.2-1) represent a small fraction, about 6%, of the combined annual oil inputs from oil seeps and oil spills (from pipelines, platforms, and tankers/barges and incidental spills) from the OCS program over the next 40 yr. Natural gas seeps are also common, but little is known about their seepage rates (Kvenvolden and Cooper 2003).

[27] Total estimates for the GOM, taking into account oil seeping from the Campeche Basin offshore of Mexico in the southern part of the Gulf, run as high as 140,000 tons (1 Mbbl) per year (Kvenvolden and Cooper 2003).

The second largest contribution to oil releases in U.S. marine waters overall is related to oil consumption (about 32%): land-based runoff and river discharge (21%), recreational marine and non-tank vessels (2.6%), tank vessel operational discharges (<1%), atmospheric deposition (8.1%), and jettisoned aircraft fuel (<1%). Other important sources of oil releases include those associated with non-OCS program oil extraction/transportation activities (about 4.7% in total): platforms, produced water, atmospheric deposition, pipeline and tank vessel spills, operational discharges (cargo washings), and coastal facility spills (NRC 2003b).

Another issue of importance to the water quality in the GOM concerns the hypoxic zone in the GOM coast shelf waters (offshore of Louisiana and Texas to the west of the Mississippi Delta). The hypoxic zone is an area near the sea bottom that contains less than 2 ppm of dissolved oxygen, causing a condition of hypoxia that is inhospitable to fish and causes stress or death to benthic organisms (USGS 2011c). It is the second largest area of oxygen-depleted waters in the world, with an area of about 22,015 km^2 (98,500 mi^2) (in 2002). The hypoxic zone is attributed to water column stratification (driven by weather and river flow) and the decomposition of organic matter in bottom waters, as well as organic matter and nutrients (that fuel phytoplankton growth) carried by the Mississippi River. The USEPA predicts that the hypoxic zone will cover an average area of 24,400 km^2 (9,420 mi^2) in the summer of 2011, the largest area recorded since systematic mapping of the zone began (USEPA 2011f). The proposed action is not expected to have a large effect on the hypoxic zone, because inflows of contaminants causing hypoxia are mainly from Mississippi River waters discharging to the GOM.

Catastrophic oil spills are rare events, but their releases have a high potential to degrade water quality in both coastal and deep waters. The 2010 DWH event released an estimated 4.9 Mbbl. In response to the spill, 7,000 m^3 (1.84 million gal) of chemical dispersants were also released (Section 3.4.1.3). The short- and long-term impacts of the spill on water quality in the GOM are still being assessed, but as of January 2011, oiling was still present on many shorelines and on barrier islands. Although traces of oil and dispersant were found in the offshore and deepwater zones, water quality benchmarks (for oil- and dispersant-related chemicals) were not exceeded in samples collected. In its August 2010 assessment, the National Incident Command (NIC) estimated that half of the oil was removed from the water column either by direct recovery, by burning or skimming, or by evaporation and dissolution. Another 24% was dispersed. About 26% of the oil (an estimated 1.3 Mbbl) remained on or near the water surface, or was deposited onshore, or buried in sand and sediments. The Georgia Sea Grant Oil Spill Update, published on August 17, 2010, estimated that between 70 and 79% (2.9 and 3.2 Mbbl) of the oil spilled during the 2010 DWH event remains at or below the water surface. It recommended further assessment of dispersed and dissolved forms of oil to determine its potential threat to the ecosystem because such forms of oil remain highly toxic (Hopkinson 2010).

Climate change predictions are based on models that simulate all relevant physical processes under a variety of projected greenhouse gas emission scenarios (Section 3.3). Because the complexity of modeling global and regional climate systems is so great, uncertainty in climate projections can never be eliminated. The Intergovernmental Panel on Climate Change

(IPCC) projections relating generally to water and water quality over the next two decades include:

- Sea level will rise by 0.18 to 0.59 m (0.6 to 2 ft) by the end of the twenty-first century;
- Sea ice, glaciers, and ice sheets in polar regions will continue melting;
- Ocean pH will decrease by 0.14 to 0.35 over the twenty-first century;
- Tropical cyclones will become more intense (>66% likely);
- Precipitation will increase at high latitudes (>90% likely); and
- Annual river discharges (runoff) will increase by 10 to 40% at high latitudes and decrease by 10 to 30% in the dry regions at mid-latitudes.

The GOM region has already experienced increasing atmospheric temperatures since the 1960s. From 1900 to 1991, sea surface temperatures increased in coastal areas and decreased in offshore areas. Sea level rise along the northern coast is as high as 0.01 m/yr (0.03 ft/yr) and has contributed to the loss of coastal wetland and mangroves and increased the rates of shoreline erosion. Future sea level rise is expected to cause saltwater intrusion into coastal aquifers, potentially making some unsuitable as potable water supplies (Section 3.3.1).

Significant changes (increases or decreases) in precipitation and river discharges to the GOM would affect salinity and water circulation — which in turn affects water quality. Water quality impacts associated with increased river discharges result from increases in nutrients (nitrogen and phosphorous) and contaminants to estuaries, increases in harmful algal blooms, and an increase in stratification. Such changes could also affect dissolved oxygen content and the extent of the GOM hypoxic zone. Decreased discharge would diminish the flushing of estuaries and increase concentrations of pathogens.

Conclusion. Water quality in coastal and marine waters would be impacted by the following activities associated with the proposed action: vessel traffic, well drilling, pipelines (trenching, landfalls, and construction), chemical releases (drilling, operation discharges, and sanitary wastes), platforms (anchoring, mooring, and removal, except in deep waters), construction of shore-based infrastructure (coastal waters only), and accidental oil spills. Coastal water in the GOM is also affected by numerous other factors, including river inflows, urbanization, agricultural practices, municipal waste discharges, and coastal industry. Non-OCS program activities likely to contribute to cumulative impacts include marine vessel traffic, wastewater discharge to coastal and marine waters, dredging and marine disposal, oil and gas production in State-owned marine waters, hard mineral mining, oil- and gas-related infrastructure, military operations, and renewable energy development. Natural seepage of oil along the continental slope is also significant. The cumulative impacts on GOM water quality from all OCS and non-OCS activities in the GOM over the next 40 to 50 yr are expected to be

moderate, and the incremental contribution of the routine Program activities to water quality impacts would be small (see Section 4.4.3.1).

The USEPA, in collaboration with other Federal and coastal State agencies, has assessed the coastal conditions of each region of the United States, including the GOM coast, by evaluating five indicators of condition, one of which was water quality, based on such parameters as dissolved oxygen, chlorophyll *a*, nitrogen, phosphorus, and water clarity.[28] The most recent assessment found the overall condition of the coastal waters of the GOM coast region to be fair to poor, with an overall condition rating score of 2.2 (on a 5.0-point scale) and an individual indicator score of 3.0 for water quality. Parameters such as dissolved oxygen and water clarity vary in relation to climatic factors (e.g., annual rainfall) (USEPA 2008b).[29] In addition, the hypoxic zone is predicted to cover a larger area of the GOM shelf than in any other year since it has been measured.

The number of accidental spills in GOM waters for most activities associated with the proposed action would represent only a small increase over the number of expected spills from ongoing OCS and non-OCS program activities, and a very small increase relative to releases from naturally occurring oil seeps (except for catastrophic spills). The incremental increase in adverse water quality impacts from these spills would depend on the weather and sea conditions at the spill location, the type of waves and tidal energy at the spill locations, the type of oil spilled (very light to very heavy), the depth of the spill event (deep water, shallow water, or surface water), and the volume and rate of spillage. Spill response and cleanup activities (e.g., *in situ* burning and use of chemical dispersants) could contribute to these impacts. A more detailed discussion of the effects of oil spills on water quality in the GOM is presented in Section 4.4.3.1.2.

4.6.2.1.2 Air Quality. Section 4.4.4 discusses air quality impacts on onshore and offshore areas of the GOM resulting from the proposed action (OCS program activities from 2012 to 2017). Cumulative impacts on air quality result from the incremental impacts of the proposed action (described in Section 4.4.4) when added to impacts from existing and reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities. Table 4.6.1-1 presents the exploration and development scenario for the GOM cumulative case (encompassing the proposed action and other OCS program activities). Non-OCS program activities also contribute to adverse cumulative impacts on air quality in the GOM; they are discussed below.

Ongoing and future routine OCS program activities, including those of the proposed action, involve production platforms, exploration wells, platform construction and removal,

[28] Other indicators used to assess coast conditions include sediment quality (toxicity, contaminants, and total organic carbon), benthic community condition, coastal habitat loss, and fish tissue contaminants. The assessment found sediment quality in the Gulf coast region also to be poor (with sediments containing pesticides, metals, PCBs, and PAHs) (USEPA 2008b).

[29] The water quality score does not include the impact of the hypoxic zone in offshore Gulf coast waters or the recent DWH oil spill (USEPA 2008b).

marine vessels (pipelaying, support, and survey), helicopters, and tanker and barge transport. All these activities have the potential to adversely affect air quality in the GOM. Accidental oil spills are also counted among OCS program-related activities; assumptions for oil spills under the cumulative case scenario are provided in Table 4.6.1-3. Other emission sources on the OCS that are not associated with oil and gas development activities include commercial marine vessels, commercial and recreational fishing, tanker lightering, military vessels, and natural sources such as oil or gas seeps. Onshore emission sources include power generation, industrial processing, manufacturing, refineries, commercial and home heating, on-road vehicles, and non-road engines (e.g., aircraft, locomotives, and construction equipment).

Criteria Pollutants. Over the past 20 yr, the USEPA has promulgated a series of measures to reduce regional and nationwide emissions from fuel combustion sources (e.g., diesel marine engines), and the beneficial effects of these measures are evident in the data collected in 2006 (the most recent year for which data are reported). NO_x emissions, mainly from transportation and fuel combustion sources, decreased nationwide by about 29% between 1990 and 2006. Most of the reductions in NO_x emissions occurred between 1998 and 2006 and are attributed to implementation of the Acid Rain Program and the NO_x State Implementation Plan (SIP) Call. SO_2 emissions, mainly from fuel combustion, industrial processes, and transportation sources, also decreased nationwide by about 38% between 1990 and 2006. During this same period, emissions from $PM_{2.5}$, PM_{10}, and CO decreased by 14, 30, and 38%, respectively (USEPA 2008c). At the State level, data collected between 1990 and 2002 indicate overall emissions have also declined in the five GOM coast States (Alabama, Florida, Louisiana, Mississippi, and Texas) in total: NO_x, down by 31%; SO_2, down by 15%; PM_{10}, down by 34%; and VOCs, down by 8%. Increases were observed only in Florida (NO_x up by 15% and VOCs up by 20%) and Alabama (VOCs up by 2%) during this period (USEPA 2011h).

Table 4.6.2-2 lists the estimated annual emissions associated with all ongoing and future OCS oil and gas activities in the GOM over the next 40 to 50 yr. These emissions were estimated by BOEM using emission factors from the *2008 Gulfwide Emission Inventory Study* (Wilson et al. 2010). In terms of absolute amounts, the largest emissions would be NO_x, followed by CO, with lesser amounts of VOC, SO_x, PM_{10}, and $PM_{2.5}$, in order of decreasing emissions. Under both the high and low scenarios, support vessels would be the largest source of NOx, SOx, and PM; production platforms would be the largest source of VOC and CO. Emissions from the Program (proposed action) generally represent about 27% of the cumulative case emissions.

Table 4.6.2-2 also presents the emissions calculated from an inventory of all non-OCS activities collected by Wilson et al. (2010) in calendar year 2008. The non-OCS program emissions estimates are based on the same source categories as for the OCS oil and gas program, but also include biogenic/geogenic sources; commercial fishing, marine, and military vessels; the Louisiana offshore oil port; and vessel lightering. The estimated OCS program annual emissions for the cumulative case are greater than those measured for non-OCS program activities in calendar year 2008 for all pollutants except SO_x. Many OCS and non-OCS program activities (e.g., support, commercial, and military marine vessel trips) are expected to increase in the future; however, emissions related to these activities are expected to be reduced by meeting USEPA standards.

TABLE 4.6.2-2 Estimated Total Air Emissions for OCS and Non-OCS Program Activities for the Gulf of Mexico Cumulative Case

	Pollutant (tons/yr)[a]					
Activity	NO_X	SO_X	PM_{10}	$PM_{2.5}$	CO	VOC
Well drilling (E&D)	34,865–44,826	4,437–5,705	615–791	606-779	8,385–10,780	830-1,067
Well drilling (D&P)	33,924-48,418	4,318–6,162	599–854	590-841	8,158–11,644	807–1,152
Platform installation/removal	1,257–1,842	176–258	29–42	29-42	159–234	29–42
Pipeline installation	10,925–23,762	1,855–4,035	412–897	412-897	2,268–4,932	412–897
Production platforms	71,080–104,176	1,738–2,547	661–969	656-961	79,611–116,680	45,404–66,545
Support vessels	127,954–187,532	17,242–25,270	2,216–3,248	2,216-3,248	12,188–17,863	2,216–3,248
Helicopters	1,054–1,545	260–381	205–301	205-301	12,903–18,911	2,548–3,735
Tankers loading	0-536	0-261	0-58	0-58	0-318	0-10,935
Tankers in transit	0-33,114	0-4,014	0-502	0-502	0-2,759	0-10,184
Tankers unloading	0-1,534	0-261	0-58	0-58	0-318	5,497
Total (Cumulative OCS)	281,059–448,283	30,026–44,619	4,738–7,720	4,714-7,687	123,672–181,361	52,247–87,621
Total (Proposed Action)[b]	60,019-125,167	6,765-14,440	1,058-2,268	1,051-2,268	8,907-22,692	23,510-45,853
Year 2008 non-OCS emissions[c]	100,880	52,022	7,004	6,481	8,432	22,442

[a] The range of values reflects the low and high end of the exploration and development scenarios for the cumulative scenario.

[b] Values from Table 4.4.4-1.

[c] Emissions are from inventory collected in calendar year 2008 and reported in Wilson et al. (2010).

The USEPA's Acid Rain Program (established under Title IV of the 1990 CAA amendments) sets a permanent cap on the total amount of SO_2 that can be released from the electric power sector, with the final 2010 cap set at 8.95 million tons (about half of the emissions from the electric power industry in 1980). NO_x emissions from coal-fired boilers were also limited under the program (to about 8.1 million tons). Between 1980 and 2008, SO_2 emissions were reduced by about 52% compared to 1990 levels. In 2008, SO_2 emissions had already fallen below the emissions cap set for 2010 and monitoring data indicated the national composite average of SO_2 mean ambient concentrations declined by 71% between 1980 and 2008. NO_x emissions from the electric power sector in 2008 were also greatly reduced (by as much as 63% relative to projected levels in 2000 without the program). The USEPA also reports significant improvements in acid deposition indicators (wet sulfate and nitrogen deposition) (USEPA 2011i).

The Cross-State Air Pollution Rule was finalized in 2011 (replacing the USEPA's 2005 Clean Air Interstate Rule) and will take effect in 2012. The rule requires 27 States in the eastern half of the United States (including all of the GOM coast States) to reduce power plant emissions contributing to ozone and/or fine particulate pollution in other States by mandating significant reductions in SO_2 and NO_x emissions from power plants. The USEPA estimates that these actions will reduce SO_2 and NO_x emissions by 73% and 54%, respectively, from 2005 levels (USEPA 2011j).

The MMS (currently BOEM) performed a cumulative air quality modeling analysis of platform emissions in a portion of the GOM in 1992 (MMS 1997b). The modeling incorporated a 40% increase in emissions above the 1992 levels to account for growth in oil and gas development. Predicted concentrations were well within the NAAQS and the Prevention of Significant Deterioration (PSD) Class II maximum allowable increases. An inventory study in the Breton National Wilderness Area (BNWA), a Class I area under the USEPA's PSD regulations, was conducted by the MMS to estimate the contribution of OCS and non-OCS program emissions to concentrations of NO_x and SO_2 in the BNWA[30] (Billings and Wilson 2004). A recent modeling-based cumulative increment analysis for SO_2 and NO_2, conducted by MMS, considered the cumulative effect of all onshore and offshore emission sources in the area with respect to the baseline year (Wheeler et al. 2008). The model results are summarized as follows:

- The increase in the 3-hr SO_2 concentration within the BNWA since 1977 (the baseline year) ranges from 0.42 to 1.70 $\mu g/m^3$; the maximum increment of 25.0 $\mu g/m^3$ has not been exceeded within the BNWA but a small portion of the increment may have been consumed. The largest change within a 50-km (31-mi) radius of the BNWA is 2.6 $\mu g/m^3$ and occurs to the south and east of Breton Island.

- The increase in the 24-hr SO_2 concentration within the BNWA since 1977 ranges from 0.11 to 1.18 $\mu g/m^3$; the maximum increment of 5.0 $\mu g/m^3$ has not been exceeded within the BNWA but a portion of the increment may have been consumed. The maximum 24-hr average SO_2 has increased over most of the GOM since 1977; it has increased or decreased over land, depending on location. For example, it has decreased as much as 7.7 $\mu g/m^3$ near Mobile, Alabama. In areas east of the Chandeleur Islands and southeast of the Breton Islands, it has increased between 1.0 and 1.64 $\mu g/m^3$.

- The annual SO_2 concentration within the BNWA has decreased by 1.07 to 1.89 $\mu g/m^3$ since 1977. The decrease in annual SO_2 is less than 0.5 $\mu g/m^3$ over much of the GOM and is greatest (more than 1.5 $\mu g/m^3$) near the GOM coast and inland over south Mississippi, Alabama, and eastern Louisiana.

[30] Under the CAA, water quality degradation is limited in Class I areas by establishing stringent "increment" limits for NO_x and SO_2. These increments are the maximum increases in ambient pollutant concentrations allowed over baseline concentrations (Billings and Wilson 2004).

Isolated increases at grid points in Louisiana and the GOM are likely due to local additions of SO_2 point sources since 1977.

- The maximum increase in annual NO_2 concentration within the BNWA since 1988 (the baseline year) is 0.10 µg/m^3, well below the maximum allowable increment of 2.5 µg/m^3. Only a very small portion of the increment has been consumed. Since 1988, annual NO_2 concentrations have decreased over land where controls have been implemented, but have increased over the GOM due to the addition of offshore NO_x emission sources. The boundary between decreased onshore concentrations and increased offshore concentrations follows the southern Louisiana coastline then turns northeastward away from the Louisiana coast and over the GOM where it crosses the BNWA and runs through the northern part of the Chandeleur Island chain. Part of the BNWA has experienced an increase in NO_2 concentrations since 1988. Larger increases are observed in areas within 75 km (47 mi) of the BNWA boundaries.

The BOEM continues to consult with the USFWS, which manages the BNWA, on any plans within 100 km (62 mi) of the BNWA.

Ozone Formation. In the Nation's ozone (O_3) nonattainment areas, emissions of NO_x and VOCs are being reduced through the SIP process in order for those areas to achieve compliance with the national O_3 standard. Prior to the revocation of the 1-hr O_3 standard in 2004, the Houston-Galveston-Brazoria (Texas) and Baton Rouge (Louisiana) areas were classified as severe nonattainment; the Beaumont-Port Arthur (Texas) nonattainment classification was serious. While the 1-hr O_3 standard no longer applies, the same emission controls will remain in effect while each State develops its plan to reach compliance with the new 8-hr standard. In October 2008, the USEPA reclassified the Houston-Galveston-Brazoria O_3 nonattainment area from a moderate 8-hr O_3 attainment area to a severe 8-hr O_3 nonattainment area and required the State to submit a revised SIP addressing the severe O_3 requirements of the CAA (73 FR 56983). In September 2010, the USEPA published a notice that the Baton Rouge moderate 8-hr O_3 attainment area had attained the 1997 8-hr O_3 NAAQS (75 FR 54778); the Beaumont-Port Arthur area was also designated an attainment area for the 1997 8-hr O_3 NAAQS in 2010 (75 FR 64675). There are no O_3 nonattainment areas in Alabama, Florida, or Mississippi.

Ozone levels in the southeast Texas have been in a steady downward trend since 1995. The maximum observed fourth highest 8-hr O_3 concentration in the Houston-Galveston area decreased from about 0.140 parts per million (ppm) in 1995 to around 0.100 ppm in 2005. Ozone levels in the Baton Rouge area remained steady over the same period, but the number of exceedances of the O_3 standard decreased. This data indicates that emission-reduction measures have been effective in reducing O_3 levels.

Modeling studies were performed using the preliminary emissions inventory prepared by Wilson et al. (2004) to examine the O_3 impacts with respect to the 8-hr O_3 standard of 80 parts per billion (ppb). One modeling study focused on the coastal areas of Louisiana extending

eastward to Florida (Haney et al. 2004). This study showed that the impacts of OCS emissions on onshore O_3 levels were very small, with the maximum contribution at locations where the standard of 1 ppb or less was exceeded. Another study, conducted by Yarwood et al. (2004), evaluated O_3 levels in southeast Texas. The results of this study indicated a maximum contribution to areas exceeding the standard of 0.2 ppb or less. The projected emissions for the cumulative case would be about the same as the emissions used in these modeling studies. The contributions to O_3 levels would therefore be similar. As emissions within the nonattainment areas are expected to decrease further in the future, the cumulative impacts from the OCS oil and gas program on O_3 levels would likely be reduced.

Visibility Impairment. Gaseous and fine particulate matter in the atmosphere can potentially degrade atmospheric visibility. Existing visibility in the eastern United States, including the GOM coast States, is impaired due to fine particulate matter containing primarily sulfates and carbonaceous material. High humidity is an important factor in visibility impairment in the GOM coastal areas. The absorption of water by the particulate matter makes them grow to a size that enhances their ability to scatter light and reduce visibility. The estimated natural mean visibility in the eastern United States is 97 to 129 km (60 to 80 mi) (Malm 1999).

Based on data presented by Malm (2000), the observed mean visual range in coastal Louisiana, Mississippi, and Alabama is about 38 to 48 km (24 to 30 mi). In the Texas coastal areas, the average visibility is about 48 to 64 km (30 to 40 mi). In the GOM coast States, about 60 to 70% of the human-induced visibility degradation (impairment) is attributed to sulfate particles, while about 20% is from organic or elemental carbon particles. About 8% of the visibility degradation is attributed to nitrate particles (Malm 2000; USEPA 2001).

Visibility degradation in large urban areas, such as Houston, can be especially pronounced during air pollution episodes. In some severe cases, it may hinder navigation by boats and aircraft. Degraded visibility also adds to the perception by the observer of bad air quality even when monitors do not record unhealthful pollutant levels.

A study of visibility from platforms off Louisiana revealed that significant reductions in Louisiana coastal and offshore visibility are almost entirely due to transient occurrences of fog (Hsu and Blanchard 2005). Episodes of haze are short-lived and affect visibility much less. Offshore haze often appears to result from plume drift generated from coastal sources. The application of visibility screening models to individual OCS facilities has shown that the emissions from a single facility are not large enough to significantly impair visibility. It is not known to what extent aggregate OCS sources contribute to visibility reductions; however, the effects from OCS sources are likely to be very minor because offshore emissions are substantially smaller than the onshore emissions.

In July 1999, the USEPA published its Regional Haze Regulations Final Rule to address visibility impairment in the Nation's National Parks and Wilderness Areas (64 FR 35714). These regulations established goals for improving visibility in Class I areas through long-term strategies for reducing emissions of air pollutants that cause visibility impairment. The rule requires States to establish goals for each affected Class I area to improve visibility on the

haziest days and to ensure no degradation occurs on the clearest days. Since visibility impairment involves considerable cross-boundary transport of air pollutants, States are encouraged to coordinate their efforts through regional planning organizations. Texas and Louisiana are part of the Central States Regional Air Planning Association. Mississippi, Alabama, and Florida are members of the Visibility Improvement State and Tribal Association of the Southeast. The USEPA provides funding to the regional planning organizations to address regional haze by developing regional strategies to reduce emissions of particulate matter and other pollutants that lead to haze (USEPA 2011k).

The Regional Haze Regulations along with the rules on ozone and acid rain should result in a lowering of regional emissions and improvement in visibility. Projected emissions from all cumulative OCS program activities are not expected to be substantially different from year 2000 emissions. The contribution of OCS program-related emissions to visibility impairment is expected to be very minor.

Conclusion. The effects of various USEPA regulations and standards are expected to result in a steady, downward trend in future air emissions. This trend should be realized in spite of continued industrial and population growth along the GOM coast. Previous O_3 nonattainment areas in the GOM coast region (Beaumont-Port Arthur, Texas, and Baton Rouge, Louisiana) were reclassified as attainment areas in 2010. States such as Texas are required to implement SIPs to reduce emissions in their O_3 nonattainment areas. The overall cumulative impacts on air quality in the GOM over the next 40 to 50 yr are expected to be minor to moderate, and the incremental contribution of the routine Program activities to air quality impacts would be small (see Section 4.4.4.1).

The OCS program contributes slightly to onshore levels of NO_2, SO_2, and PM_{10}, but concentrations are well within the national standards and PSD increments. The effects from future OCS program activities are expected to remain about the same as in previous years. Portions of the GOM coast region have O_3 levels that exceed the Federal standard, but the contribution from all OCS program activities to ozone levels is very small (about 1%; see Section 4.4.4.1.1). Ozone levels are on a declining trend due to air pollution control measures that have been implemented by the States. This trend is expected to continue as a result of local as well as nationwide control efforts. The contribution of the Program to onshore O_3 would therefore remain very small. The GOM coast region has significant visibility impairment from anthropogenic emission sources. However, visibility is expected to improve somewhat as a result of regional and national programs to reduce emissions. The contribution from OCS program activities to visibility impairment, therefore, is expected to remain small.

Impacts from the evaporation of accidental oil spills for the cumulative case would be similar to those for the Program (see Section 4.4.4.1.2). Since impacts from individual spills would be localized and temporary (due to the spreading of oil and action by winds, waves, and currents that disperse volatile compounds to extremely low levels over a relatively larger area), the magnitude of their impacts would be no different from those associated with the proposed action. However, as many as 330 small (greater than 50 bbl and less than 1,000 bbl) and 40 large oil spills (greater than 1,000 bbl; with the largest spills from tanker vessels) are projected to occur over the 40 to 50 yr. Impacts from fires would also be localized and short in duration.

A more detailed discussion of the effects of oil spills on air quality in the GOM is presented in Section 4.4.4.1.2.

4.6.2.1.3 Acoustic Environment. Section 4.4.5.1 discusses impacts on the acoustic environment in the GOM resulting from the proposed action (OCS program activities from 2012 to 2017). Section 4.4.7 evaluates the direct and indirect impacts of noise on marine fauna (mammals, birds, and fish), and Section 4.6.4 addresses the cumulative impacts of noise on marine fauna. Cumulative impacts on the acoustic environment result from the incremental impacts of the proposed action when added to impacts from existing and reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities. Table 4.6.1-1 presents the exploration and development scenario for the GOM cumulative case (encompassing the proposed action and other OCS program activities). Ongoing and reasonably foreseeable non-OCS program activities contributing to adverse cumulative impacts on the acoustic environment in the GOM include marine subsurface and surface vessel traffic, aircraft traffic (helicopters and fixed-wing aircraft), dredging, construction of onshore and offshore facilities (e.g., production platforms and drilling rigs in State waters), LNG facility operations, renewable energy projects (foreseeable), marine geophysical (seismic) surveys, active sonars, underwater explosions, ocean science studies, and mining operations. This section addresses the quality of the acoustic environment only; the cumulative impacts of noise on GOM marine fauna are discussed in Section 4.6.4.1.

Ambient (background) noise has numerous natural and man-made sources that vary with respect to season, location, depth of occurrence, time of day, and noise characteristics (e.g., frequency and duration).[31] Natural sources of ambient noise include wind and waves, surfs (produced by waves breaking onshore), precipitation (rain and hail), lightning, volcanic and tectonic noise, and biological noise (from fishes, shrimp, and marine mammals). Vessels are the greatest man-made contributors to overall marine noise in the GOM. Underwater explosions in open water are the strongest point sources of man-made sound. Baseline acoustic conditions in the GOM are discussed in more detail in Section 3.6.1.

Ongoing and future routine OCS program activities, including those of the proposed action, that generate noise include operating air gun arrays (during marine seismic surveys), drilling, pipeline trenching, and onshore and offshore construction and decommissioning of platforms and drilling rigs. Vessel and aircraft traffic (including those associated with emergency-response and cleanup activities in the event of a spill), accidental releases (e.g., loss of well control events), and vessel collisions also contribute to noise. A preliminary study of the noise impacts of OCS-related geophysical surveys found that marine seismic surveys have the greatest impact on marine mammals, sea turtles, fish, and commercial and recreational fisheries (MMS 2004a). Noise generated from OCS and non-OCS program activities would be transmitted through both air and water, and may be transient or more extended (occurring over the long term).

[31] Higher frequencies are attenuated with distance from the source more rapidly than lower frequencies. Traffic noise generated in deep water contributes to background noise levels at greater distances than traffic noise generated in shallow water.

Conclusion. The quality of the acoustic environment in the GOM would continue to be adversely affected by ongoing and future OCS program and non-OCS program activities. Activities under the proposed action would contribute to adverse cumulative impacts on the quality of the acoustic environment in the GOM. The magnitude of cumulative impacts in the GOM is time- and location-specific and could range from minor to major, depending on the ambient acoustic conditions and the nature and combination of all OCS and non-OCS program activities in the GOM over the next 40 to 50 yr, and the incremental contributions due to noise generated by routine Program activities (minor impacts) would also vary with time and location and would depend on the characteristics of noise sources present (e.g., their frequency and duration). The cumulative impacts of noise on marine fauna are discussed in Section 4.6.4.

4.6.2.2 Alaska Region – Cook Inlet

4.6.2.2.1 Water Quality. Section 4.4.3.2 discusses water quality impacts in coastal and marine waters in the Cook Inlet resulting from the proposed action (OCS program activities from 2012 to 2017). Cumulative impacts on water quality result from the incremental impacts of the proposed action when added to impacts from reasonably foreseeable future non-OCS program activities. Table 4.6.1-2 presents the exploration and development scenario for the Cook Inlet cumulative case. Non-OCS program activities contributing to adverse cumulative impacts on water quality in Cook Inlet are summarized in Table 4.6.2-3.

OCS program activities (i.e., those of the proposed action; there are no existing OCS program activities) involve vessel traffic, chemical releases (permitted discharges), and disturbance of bottom sediments. Accidental oil spills are also counted among OCS program-related activities; assumptions for oil spills under the cumulative case scenario are provided in Table 4.6.1-3. All these activities have the potential to adversely affect water quality in Cook Inlet.

OCS program-related marine vessel traffic in Cook Inlet could be as high as one to three trips per week over the next 40 yr, all of which are associated with the proposed action. Extensive non-OCS program marine traffic also occurs in Cook Inlet. Non-OCS program traffic includes that related to crude oil and finished product transport, LNG and ammonia carriers (at the Nikiski industrial complex), commercial fishing boats, and cruise ships. Fuel barge traffic is minimal since much of the refined oil for regional consumption is transported to Anchorage by a pipeline from the Tesoro refinery in Nikiski. An estimated 704 large vessels (other than fuel barges on domestic trade) called at Cook Inlet ports between January 1, 2005, and July 15, 2006. About 65% of these were made by container vessels, roll-on/roll-off cargo ships, or ferries; 29% were gas or liquid tank ships calling at Nikiski. The remaining traffic consisted of bulk carriers, general cargo ships, tugs, and fishing and passenger vessels. Impacts on water quality from vessel traffic in Cook Inlet result mainly from oil and gasoline spills when vessels run aground, collide, catch fire, or sink (Eley 2006).

The number of production wells and oil platforms constructed over the period of the Program (at most, 114 and 3, respectively) will be proportional to the amount of oil produced

TABLE 4.6.2-3 Ongoing and Reasonably Foreseeable Future Non-OCS Activities Contributing to Cumulative Impacts on Water Quality – Cook Inlet

Type of Action	Associated Activities and Facilities (Impacting Factors)	Description
Marine vessel traffic	Accidental oil spills	Large vessel calls at marine facilities and terminals totaled 704 between January 1, 2005, and July 15, 2006. Most of these calls (65%) were container vessels, roll-on/roll-off cargo ships, or ferries; 29% were gas or liquid tankships. Another 6% were bulk carriers and general cargo; another 2% were tugs and fishing and passenger vessels. Facilities in Cook Inlet include the Nikiski industrial complex terminals (between Homer and Anchorage), the Port of Anchorage docks, and the Drift River terminal (37 km [23 mi] west-southwest of Nikiski) (Eley 2006).
Nikiski industrial complex	Permitted discharge points Pollutant releases via surface runoff (non-point discharges) Accidental oil or chemical spills Increased risk of explosions and fires Cooled water and biocide releases (LNG plant)	The LNG plant on the East Foreland peninsula of Cook Inlet (at Nikiski) is currently the only LNG export operation in the United States; it exported about 30 Bcf of gas in 2010. The USDOE has extended the plant's export license to 2013; however, in February 2011, ConocoPhillips announced it would close the plant, citing concerns over the gas supply and the deteriorated LNG market in Asia (Bradner 2011).
	Increased vehicle and marine traffic	See entry under "Oil- and gas-related activities and infrastructure" (this table).
Wastewater discharge to Cook Inlet	Permitted discharge points Pollutant releases via surface runoff (non-point discharges)	The major point sources of pollution in Cook Inlet include discharges (by discrete conveyances such as pipes or man-made ditches) from municipal wastewater treatment plants (e.g., Anchorage), seafood processors, and the petroleum industry (MMS 1995a). Most of these activities would remain at present levels for the foreseeable future and are not expected to affect the overall water quality in Cook Inlet. Discharges are regulated through the USEPA NPDES permit program. Section 403 of the CWA established the Ocean Discharge Criteria, which provide additional requirements for these types of discharges. The Alaska Department of Environmental Quality issues all NPDES permits in Alaska except for those related to oil and gas, munitions, cooling water, pesticides, and offshore seafood processors, and

TABLE 4.6.2-3 (Cont.)

Type of Action	Associated Activities and Facilities (Impacting Factors)	Description
		those on tribal lands. Current NPDES permits in Alaska are available on the USEPA website at http://yosemite.epa.gov/r10/water.nsf/NPDES+Permits/CurrentAK822. Non-point sources of pollution include stormwater and snowmelt that runs over land or through the ground, entraining pollutants and depositing them into the inlet. (The Cook Inlet watershed is home to two-thirds of Alaska's population; therefore, the quality of runoff in the watershed is heavily influenced by human activity.) The most common forms of pollution in Alaska's urban runoff include fecal coliform, sedimentation, and petroleum. Snow disposal into the marine environment also introduces oil, grease, antifreeze, chemicals, trash, animal wastes, salt, and sediments (sand, gravel, suspended and dissolved solids) (ADEC 2007b). Non-point source management programs under Section 319 of the CWA regulate these pollutant sources. The USEPA and NOAA also co-administer State Coastal Non-Point Pollution Control Programs under Section 6217 of the Coastal Zone Act Reauthorization Amendments of 1990 (USEPA 2011).
Dredging and marine disposal	Excavation of subaqueous sediments Transport of sediments (by dredger or pipeline) Relocation and disposal of sediments	The USACE currently has dredging projects in Anchorage Harbor, Homer Small Boat Harbor, and Ninilchik Harbor (Anderson 2010).

TABLE 4.6.2-3 (Cont.)

Type of Action	Associated Activities and Facilities (Impacting Factors)	Description
Oil- and gas-related activities and infrastructure	Port of Anchorage Nikiski industrial complex Exploration wells Oil and gas pipelines Tanker vessels Onshore fuel storage tanks and transfer stations Hazardous spills/releases	Except for the Beaver Creek Unit, all other oil-producing fields in Cook Inlet are in State waters (MMS 2003a). There are 15 active offshore production platforms in the inlet. Crude oil production is handled through the Trading Bay facility and the Tesoro refinery in Nikiski; natural gas is consumed locally and processed through several plants in Nikiski. There is also a LNG plant (Phillips Marathon) at Nikiski (slated to close in 2011. Most of Cook Inlet's oil reserves have been produced; oil production in the region, therefore, has been in decline since 1970. The Port of Anchorage stages all of the refined petroleum products from Fairbanks and facilitates petroleum deliveries from refiners on the Kenai Peninsula and in Valdez (it does not receive foreign crude oil imports). The port is currently undergoing expansion that would likely begin in 2013 (Municipality of Anchorage 2011).

and reflects the total number of production wells and platforms anticipated to be built in Cook Inlet over the next 40 to 50 yr as part of the OCS program. The length of new pipeline (at most 241 km [150 mi] offshore and 169 km [105 mi] onshore) added as part of the Program represents all of that anticipated over the next 40 yr as part of the OCS program.

The area of sea bottom disturbed from construction of platforms and pipelines over the period of the Program (as much as 260 ha [640 ac] total) also represents that associated with the OCS program over the next 40 to 50 yr. Bottom disturbance degrades water quality by increasing water turbidity (i.e., suspended sediment concentration) in the vicinity of the operations and adding contaminants to the water column. It also changes sediment composition as suspended sediments (and contaminants, if present) are entrained in currents and deposited in new locations.

As summarized in Section 3.4.2, the principal point sources of pollution in Cook Inlet include municipal discharges, as well as discharges from seafood processors and the petroleum industry. Point-source pollution is rapidly diluted by the energetic tidal currents in Cook Inlet, and the USEPA *National Coastal Condition Report III* has rated the coastal waters of south central Alaska, including Cook Inlet, as good (although water clarity in upper Cook Inlet was rated poor because of very high loadings of glacial river sediments) (USEPA 2008b). Non-point sources release a range of contaminants via rivers and on-land drainages and are primarily from urban runoff (related to land development); forest practices (e.g., timber harvest operations); harbors and marinas; roads, highways, and bridges; hydromodification (related to dams, channel modification, and stream bank erosion); mining; and agriculture (ADEC 2007). Point-source discharges are anticipated to remain at present levels for the foreseeable future; non-point-source discharges should improve as a result of Alaska's water pollution control strategy (as outlined in ADEC 2007). Low concentrations of hydrocarbons are found throughout the waters of Cook Inlet and are attributed to natural sources — natural oil seeps, river discharges carrying carbon compounds of biogenic origin, and the deposition of fuel and natural organic matter (e.g., from fires) (MMS 2003a).

Activities taking place within Cook Inlet waters also contribute to the degradation of water quality. These include oil spills associated with vessel traffic, sediment dredging and disposal in local harbors (suspended sediments and contaminants), and activities related to the oil and gas industry, which operates platforms in State waters and discharges drilling wastes, produced water, and other industrial waste streams into Cook Inlet waters (MMS 2003a).

Most of the oil released to Cook Inlet is from commercial and recreational vessels (MMS 2003a). Smalls spills (less than 1,000 bbl) from commercial and recreational vessels or from OCS program activities (e.g., accidental releases) are not expected to affect the overall quality of Cook Inlet water (because they would be localized and short in duration); however, large spills (greater than 1,000 bbl) could temporarily degrade the overall quality of its water (MMS 2003a). Oil spills in ice-covered waters during winter months are generally contained within a much smaller area (compared with spills in open waters) because oil weathering (i.e., spreading, evaporation, and migration) is much slower and some oil may solidify. While such factors have proven to be favorable for most response strategies, the presence of ice can also complicate response efforts. Spills on ice are fairly easy to detect and map, unless there is

fresh snowfall at the time of the spill; however, oil spilled within and under the ice can be hidden from view. Broken ice also makes spilled oil difficult to detect and map, and it can reduce the effectiveness of conventional recovery systems (MMS 2009b; DF Dickens Associates, Ltd. 2004).

Climate change predictions are based on models that simulate all relevant physical processes under a variety of projected greenhouse gas emission scenarios (Section 3.3). Because the complexity of modeling global and region climate systems is so great, uncertainty in climate projections can never be eliminated. The IPCC projections relating generally to water and water quality over the next two decades include:

- Sea level will rise by 0.18 to 0.59 m (0.6 to 2 ft) by the end of the twenty-first century;
- Sea ice, glaciers, and ice sheets in polar regions will continue melting;
- Ocean pH will decrease by 0.14 to 0.35 over the twenty-first century;
- Precipitation will increase at high latitudes (>90% likely); and
- Annual river discharges (runoff) will increase by 10 to 40% at high latitudes and decrease by 10 to 30% in the dry regions at mid-latitudes.

Alaska has experienced extensive regional warming since the 1960s, with a rise in annual temperature of about 3°C (5°F) since the 1960s. The general effects of warming include the extensive melting of glaciers, thawing of permafrost, and increased precipitation (Section 3.3). Modeling studies of warming in Cook Inlet project very large warming trends, ranging from 4°C to 10°C (7°F to 18°F) by the year 2100; precipitation is projected to increase by 20 to 25% (Kyle and Brabets 2001).

Conclusion. Water quality in Cook Inlet would be impacted by the following activities associated with the proposed action: vessel traffic, chemical releases (sanitary wastes), disturbance of bottom sediments, and accidental oil spills (from vessels and the oil and gas industry). Water quality is also affected by many other factors, including river inflows, urbanization, forest practices, mining, and agriculture. Non-OCS program activities likely to contribute to cumulative impacts include marine vessel traffic, wastewater discharge to the inlet, dredging and marine disposal, and oil and gas related activities, as well as infrastructure in State-owned marine waters. Natural seepage of oil along the west part of the inlet may also significant. The cumulative impacts on Cook Inlet water quality from all OCS and non-OCS activities in Cook Inlet over the next 40 to 50 yr are expected to be minor to moderate, and the incremental contribution of the routine Program activities to water quality impacts would be minor. These impacts may lessen with time since oil and gas production in the Cook Inlet is currently on the decline (see Section 4.4.3.2).

The USEPA, in collaboration with other Federal and coastal State agencies, has assessed the coastal conditions of each region of the United States, including Cook Inlet, by evaluating

five indicators of condition, one of which was water quality, based on such parameters as dissolved oxygen, chlorophyll *a*, nitrogen, phosphorus, and water clarity. The most recent assessment found the overall condition of the coastal waters of south-central Alaska, including Cook Inlet, good (although water clarity in upper Cook Inlet was rated poor). Point source discharges are anticipated to remain at present levels for the foreseeable future; non-point source discharges should improve as a result of Alaska's water pollution control strategy. Low concentrations of hydrocarbons are found throughout the waters of Cook Inlet and are attributed to natural sources.

The number of accidental spills in Cook Inlet waters for most activities associated with the proposed action would represent only a small increase over the number of expected spills from ongoing non-OCS program activities. The incremental increase in adverse water quality impacts from these spills would depend on the weather and sea conditions at the spill location (e.g., whether ice is present), the type of waves and tidal energy at the spill locations, the type of oil spilled (very light to very heavy), the depth of the spill event (deep water, shallow water, or surface water), and the volume and rate of spillage. A more detailed discussion of the effects of oil spills on water quality in Cook Inlet is presented in Section 4.4.3.2.2.

4.6.2.2.2 Air Quality. Section 4.4.4.2 discusses air quality impacts in onshore and offshore areas of Cook Inlet resulting from the proposed action (OCS program activities from 2012 to 2017). Cumulative impacts on air quality result from the incremental impacts of the proposed action when added to impacts from other reasonably foreseeable future OCS program activities.[32] Table 4.6.1-2 presents the exploration and development scenario for the Cook Inlet cumulative case. Non-OCS program activities may also contribute to adverse cumulative impacts on air quality in the Cook Inlet region; they are discussed below.

OCS program activities, i.e., those of the proposed action (there are no existing OCS program activities), involve production platforms, exploration wells, platform construction and removal, marine vessels (pipelaying, support, and survey), helicopters, and tanker and barge transport. All these activities have the potential to adversely affect air quality in the Cook Inlet region via direct emissions or other releases to air (e.g., volatile components of fuel). Accidental oil spills are also counted among OCS program-related activities; assumptions for oil spills under the cumulative case scenario are provided in Table 4.6.1-3. Existing emission sources in the Cook Inlet Planning Area include oil production activities in State waters, onshore petroleum processing and refining, onshore oil and gas production, marine terminals, and commercial shipping.

Except for a few population centers such as Anchorage, Fairbanks, and Juneau, the existing air quality in Alaska is relatively pristine, with pollutant concentrations well within ambient standards (Section 3.5.2.2). The primary industrial emissions in the Cook Inlet region are associated with oil and gas production, power generation, small refineries, paper mills, and mining. Other sources include vessel traffic in Cook Inlet and emissions from on-land motor

[32] Currently, there are no existing OCS activities in Cook Inlet and no future activities other than those planned for the 2012-2017 OCS program.

vehicles and refuse burning (MMS 2003a). While some growth of these activities is likely to take place in the future, overall emissions are expected to remain low. More stringent emission standards on motor vehicles and new USEPA standards on non-road engines and marine vessels would result in a downward trend in emissions.

Modeling studies of proposed OCS production facilities in the Cook Inlet show that concentrations of NO_2, SO_2, and PM_{10} are within the PSD Class II and Class I maximum allowable increments and the NAAQS. Pollutant concentrations within the Tuxedni NWA, the only Class I area adjacent to the Cook Inlet Planning Area, exceed the Class I significance levels. As a consequence, any proposed facilities that would exceed the Class I significance levels, would need a comprehensive PSD increment consumption analysis done before permitting (MMS 2003a).

The baseline conditions and impacts from OCS activities on ozone and visibility are discussed in Sections 3.5.2.2 and 4.4.4.2, respectively. Because conditions in Alaska are seldom favorable for significant O_3 formation, the contribution of leasing activity associated with the Program to O_3 levels in the Cook Inlet region is expected to be small. OCS emission sources affecting visibility are also small; however, preliminary visibility screening for the Tuxedni NWA suggests sources within about 50 km (30 mi) may result in a plume visible from the site (MMS 2003a).

Accidental oil spills are sources of gaseous emissions. No more than one large spill (greater than 1,000 bbl) and 15 small spills (less than 50 bbl) are projected for the Cook Inlet Planning Area cumulative case as a result of the OCS program. Most accidental spills in the Cook Inlet region are of non-crude products caused by onshore train derailments, pipeline failures, and leaks (crude oil comprises about 4% of all product spills) (ADEC 2007). Since 1976, there have been nine major crude oil spills in the inlet, ranging in volume from 10,000 to 396,000 gal (with the largest of these coming from construction barges, offshore platforms, and jet fuel releases); the last major oil spill occurred in 1997 as a result of a loss of well control incident at the Steelhead Platform (State of Alaska 2011). Oil spills cause localized increases in VOC concentrations (proportional to the size of the spill) due to evaporation. Most of these emissions would be expected to occur within a few hours of the spill and decrease (by dispersion) drastically after that period (MMS 2003a). However, oil spills in ice-covered waters during winter months would be contained within a much smaller area (compared with spills in open waters) because oil weathering (i.e., spreading, evaporation, and migration) is much slower and some oil may solidify (MMS 2009b). A more detailed discussion of the effects of oil spills on air quality in Cook Inlet is presented in Section 4.4.4.2.

Catastrophic events at well locations may result in fires; *in situ* burning is also a preferred technique for cleanup and disposal of oil spills (documented in soil spill contingency plans). Smoke generated from such fires would be expected to reach shore quickly (within a day), but would be limited in geographic extent (MMS 2003a). A discussion of the effects of fires on air quality in the Arctic region is presented in Section 4.4.4.2.

Conclusion. OCS program activities in combination with other oil and gas exploration, development, and production activities in the Cook Inlet Planning Area could affect air quality in

the region over the next 40 to 50 yr. Air pollutant concentrations associated with offshore and onshore emission sources are expected to remain well within applicable State and Federal standards over the life of the Program. Therefore, the overall cumulative impacts on air quality in Cook Inlet from all OCS and non-OCS activities in the GOM over the next 40 to 50 yr are expected to be minor to moderate, and the incremental contribution of the routine Program activities to air quality impacts would be small (see Section 4.4.4.2).

Impacts from the evaporation of accidental oil spills for the cumulative case would be similar to those for the Program (see Section 4.4.4.2.2). Since impacts from individual spills would be localized and temporary (due to the spreading of oil and action by winds, waves, and currents that disperse volatile compounds to extremely low levels over a relatively larger area or solidification of oil during winter months), the magnitude of their impacts would be no different from those associated with the proposed action. However, as many as three small (greater than 50 bbl and less than 1,000 bbl) and one large oil spills are projected to occur over the next 40 to 50 yr. Impacts from fires would also be localized and short in duration. A more detailed discussion of the effects of oil spills on air quality in Cook Inlet is presented in Section 4.4.4.2.2.

4.6.2.2.3 Acoustic Environment. Section 4.4.5.2 discusses impacts on the acoustic environment in Cook Inlet resulting from the proposed action (OCS program activities from 2012 to 2017). Section 4.4.7 evaluates the direct and indirect impacts of noise on marine fauna (mammals, birds, and fish), and Section 4.6.4 addresses the cumulative impacts of noise on marine fauna. Cumulative impacts on the acoustic environment result from the incremental impacts of the proposed action when added to impacts from reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities.[33] Table 4.6.1-1 presents the exploration and development scenario for the Cook Inlet cumulative case (encompassing the proposed action and other OCS program activities). Ongoing and reasonably foreseeable non-OCS program activities contributing to adverse cumulative impacts on the acoustic environment in the Cook Inlet include aircraft overflights, vessel activities and traffic, construction and decommissioning of onshore and offshore facilities (e.g., related to ongoing oil and gas exploration and development in State waters), and other activities (e.g., seismic surveys) conducted as part of the existing oil and gas industry in the inlet. This section addresses the quality of the acoustic environment only; the cumulative impacts of noise on Cook Inlet marine fauna are discussed in Section 4.6.4.2.

Ambient (background) noise has numerous natural and man-made sources that vary with respect to season, location, depth of occurrence, time of day, and noise characteristics (e.g., frequency and duration).[34] Natural sources of ambient noise include wind and wave action, strong tidal fluctuations, currents, ice, precipitation (rain and hail), lightening, volcanic and tectonic noise, and biological noise (from marine mammals and coastal birds). Vessels (e.g., tankers, supply ships, tugboats, barges, and fishing boats) are the greatest man-made

[33] Currently, there are no existing OCS program activities in Cook Inlet.

[34] Higher frequencies are attenuated with distance from the source more rapidly than lower frequencies. Traffic noise generated in deep water contributes to background noise levels at greater distances than traffic noise generated in shallow water.

contributors to overall marine noise in Cook Inlet. Baseline acoustic conditions in Cook Inlet are discussed in more detail in Section 3.6.2.

Ongoing and future routine OCS program activities, including those of the proposed action, that generate noise include operating air gun arrays (during marine seismic surveys), drilling, pipeline trenching, and onshore and offshore construction of platforms and drilling rigs. Vessel and aircraft traffic (including that associated with emergency response and cleanup activities in the event of a spill), accidental releases (e.g., loss of well control events), and vessel collisions also contribute to noise. A preliminary study of the noise impacts of OCS-related geophysical surveys found that marine seismic surveys have the greatest impact on marine mammals, sea turtles, fish, and commercial and recreational fisheries (MMS 2004a). Noise generated from OCS and non-OCS program activities would be transmitted through both air and water, and may be transient or more extended (occurring over the long term).

Conclusion. The quality of the acoustic environment in Cook Inlet would continue to be adversely affected by ongoing and future non-OCS program activities and by future OCS program activities (currently there are no existing OCS activities). Activities under the proposed action would contribute to adverse cumulative impacts on the quality of the acoustic environment in the inlet. The magnitude of cumulative impacts due to noise in Cook Inlet from all OCS and non-OCS activities in Cook Inlet over the next 40 to 50 yr is time- and location-specific and could range from minor to major, depending on the ambient acoustic conditions and the nature of activities taking place. The incremental contribution of the routine Program activities (minor impacts) would also vary with time and location and would depend on the characteristics of noise sources present (e.g., their frequency and duration). The cumulative impacts of noise on marine fauna are discussed in Section 4.6.4.

4.6.2.3 Alaska Region – Arctic

4.6.2.3.1 Water Quality. Section 4.4.3.3 discusses water quality impacts in coastal and marine waters in the Beaufort and Chukchi Seas resulting from the proposed action (OCS program activities from 2012 to 2017). Cumulative impacts on water quality result from the incremental impacts of the proposed action when added to impacts from existing and reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities.[35] Table 4.6.1-2 presents the exploration and development scenario for the Arctic region cumulative case. Non-OCS program activities contributing to adverse cumulative impacts on water quality in Beaufort and Chukchi Seas are summarized in Table 4.6.2-4.

[35] Currently, there are no existing OCS program activities in the Beaufort Sea and Chukchi Sea Planning Areas, but it is assumed that exploration and development activities as a result of Sale 193 (Chukchi Sea) will have occurred before commencement of the exploration and development activities associated with the proposed action (Section 4.4.1.3).

TABLE 4.6.2-4 Ongoing and Reasonably Foreseeable Future Non-OCS Activities Contributing to Cumulative Impacts on Water Quality – Arctic Region

Type of Action	Associated Activities and Facilities (Impacting Factors)	Description
Marine vessel traffic	Discharges of bilge water and waste Accidental oil spills	Current level of vessel traffic is low, consisting mainly of vessels supporting the oil and gas industry (e.g., cargo vessels, tugs/barges, service vessels, spill-response vessels, and hovercraft. Other vessels include those used by the military, arctic researchers (icebreakers), and by local communities for hunting and between-village transportation during the open water period. As open water season begins earlier and ends later, vessel traffic is likely to increase for shipping, research, and cruise-ship tourism (MMS 2008b). There is substantial international vessel traffic in the Bering Strait (the narrow international strait that connects the north Pacific Ocean to the Arctic Ocean) and Chukchi Sea; activity in this region increased from 245 marine vessel transits in 2008 (in the Bering Strait) to 325 transits in 2010. This trend is expected to continue with ongoing exploration and drilling activities on the U.S. and possibly the Russian portion of the Chukchi shelf (USCG 2011).
Wastewater discharges	Permitted discharge points Pollutant releases via surface runoff (non-point discharges)	Point-source discharges to the Beaufort and Chukchi Seas include those from facilities related to the oil and gas industry, hard-rock and placer mining, military operations, and seawater treatment (ADEC 2010; USEPA 2010c). Most of these activities would remain at present levels for the foreseeable future and are not expected to affect the overall water quality in these regions. Discharges are regulated through the USEPA NPDES permit program. Section 403 of the CWA established the Ocean Discharge Criteria, which provide additional requirements for these types of discharges. The Alaska Department of Environmental Quality issues all NPDES permits in Alaska except for those related to oil and gas, munitions, cooling water, pesticides, and offshore seafood processors, and those on tribal lands. Current NPDES permits in Alaska are available on the USEPA Web site at http://yosemite.epa.gov/r10/water.nsf/NPDES+Permits/CurrentAK822.

TABLE 4.6.2-4 (Cont.)

Type of Action	Associated Activities and Facilities (Impacting Factors)	Description
		Non-point sources of pollution include stormwater and snowmelt that run over land or through the ground, entraining pollutants and depositing them into Arctic waters. The most common forms of pollution in Alaska's urban runoff include fecal coliform, sedimentation, and petroleum. Snow disposal into the marine environment also introduces oil, grease, antifreeze, chemicals, trash, animal wastes, salt, and sediments (sand, gravel, suspended and dissolved solids) (ADEC 2007b). Non-point source management programs under Section 319 of the CWA regulate these pollutant sources. The USEPA and NOAA also co-administer State Coastal Non-Point Pollution Control Programs under Section 6217 of the Coastal Zone Act Reauthorization Amendments of 1990.
Dredging and marine disposal	Excavation of subaqueous sediments Transport of sediments (by dredger or pipeline) Relocation and disposal of sediments	Mechanical and hydraulic dredges have been used to excavate materials to construct artificial islands (drilling platforms), helipads, and coastal harbors/shipping corridors in the Beaufort Sea. All past dredging activities have been conducted to support the oil and gas industry — in the 1950s and 1960s, it was for shipping and transportation; in the 1970s and 1980s, it was mainly for the construction of islands (30 islands were built during this time). Most dredging occurred during the open water season in water depths less than 50 m (150 ft). Harbors, channels, and mooring basins were dredged in MacKinley Bay, Tuft Point, and Tuktoyaktuk. Several regulations govern the dredging operations in arctic waters (IMG Golder Corp. 2004). The likelihood of future dredging projects is not known but is considered to be low.

TABLE 4.6.2-4 (Cont.)

Type of Action	Associated Activities and Facilities (Impacting Factors)	Description
Oil- and gas-related activities and infrastructure	Ports and terminals Exploration wells Oil and gas pipelines Tanker vessels Onshore fuel storage tanks and transfer stations Hazardous spills/releases	Thirty-five oil-producing fields and satellites have been developed on the North Slope and nearshore areas of the Beaufort Sea. Industrial development centers on Prudhoe Bay; infrastructure includes roadways, pipelines, production and processing facilities, gravel mines, and docks. After 30 yr of leasing in the Alaska OCS, there are no commercial oil or gas facilities located on Federal OCS lands. Most projects are located offshore in the State waters of the Beaufort Sea (MMS 2008b). Two large diesel fuel spills have occurred in the Beaufort Sea — one of 2,440 bbl from a diesel tank on an eroded gravel island in the Canadian Beaufort Sea (September 1985) and one of 1,600 bbl from a punctured barge delivering fuel to Kaktovik (August 1988) (MMS 2008b). There were 4,481 spills of seawater, produced water, crude oil, diesel, and drilling muds on the Alaska North Slope subarea between 1995 and 2005 (totaling 45,000 bbl); 98% of the volume released resulted from spills greater than 99 gal. Oil exploration and production facilities were responsible for more than 90% of the spills and about 90% of the volume. Over the past 20 yr, most large spills were of diesel fuel and occurred in local villages (ADEC 2007a; MMS 2008b).

TABLE 4.6.2-4 (Cont.)

Type of Action	Associated Activities and Facilities (Impacting Factors)	Description
Red Dog Mine	Transport by barge	The Red Dog Mine, operated by Teck Cominco Alaska, is one of the largest lead and zinc mines in the world and the only base-metal lode mine currently in production in northwest Alaska. The open-pit mine (with processing mill, tailings impoundment, and support facilities) is located in the DeLong Mountains about 130 km (82 mi) north of Kotzebue and 74 km (46 mi) inland from the Chukchi seacoast; it has produced more than a million tons of zinc and lead concentrates annually but is estimated to be mined out by 2012. Teck Cominco Alaska is proposing to mine an adjacent deposit (Aqqaluk Deposit) and continue its operations until 2031 (ADNR 2011; USEPA 2009). Processed ore (concentrate) is transported from the Red Dog Mine by an 84-km (52-mi) road to the DeLong Mountain Terminal, a port facility located on the Chukchi Sea. The terminal consists of a housing unit, six diesel storage tanks, two concentrate storage buildings, a laydown area, and a concentrate conveyor/ship loading system. Although concentrate is shipped from the mine to the terminal year-round, shipping of concentrate by barge (to deep sea cargo ships) occurs only during months when the waters are ice-free (generally from July through October). The port site also includes a small domestic wastewater treatment system that discharges to the Chukchi Sea under a NPDES permit (USEPA 2009). The Red Dog Mine may be a source of trace metals in the Chukchi Sea (Section 3.4.3).
Gold (placer mining) on Seward Peninsula (Chukchi Sea)	Use of mercury for amalgamation	Mining of placer gold in beach deposits and bench gravels continued through 1900 and could present a risk of contamination to nearby water and sediments.

Ongoing and future routine OCS program activities (i.e., those of the proposed action and existing OCS program activities) involve vessel traffic, waste disposal, chemical releases (permitted discharges), and disturbance of bottom sediments. All these activities have the potential to adversely affect water quality in the Beaufort and Chukchi Seas. Accidental oil spills are also counted among OCS program-related activities; assumptions for oil spills under the cumulative case scenario are provided in Table 4.6.1-3.

OCS program-related marine vessel traffic in the Beaufort and Chukchi Seas could be as high as 41 trips per week (up to 18 in the Beaufort Sea and 23 in the Chukchi Sea) over the next 40 to 50 yr; vessel traffic associated with the proposed action represents about 66% of this traffic but would occur only during open-water and broken ice conditions (typically during August and September). Non-OCS program traffic in the Beaufort and Chukchi Seas is relatively low and includes that related to the oil and gas industry (e.g., cargo vessels, spill response vessels, and hovercraft), military operations, and arctic research. Small vessels are used by local communities for hunting and between-village transportation during the open water period (MMS 2008b). Impacts on water quality from marine traffic arise from regular discharges of bilge water and waste, leaching of anti-fouling paints, and incidental spills (MMS 2001).

In the Beaufort Sea Planning Area, the number of production wells and oil platforms constructed over the period of the Program (at most 120 and 4, respectively) will be proportional to the amount of oil produced; these numbers represent about 32 and 33% (respectively) of the total number of production wells and platforms anticipated to be built in the planning area over the next 40 to 50 yr as part of the Program. The lengths of new onshore and offshore pipeline (at most 129 km [80 mi] and 250 km [155 mi], respectively) added as part of the Program represent about 21 and 30%, respectively, of that anticipated as part of the OCS program.

In the Chukchi Sea Planning Area, the number of production wells and oil platforms constructed over the period of the Program (at most 280 and 5, respectively) will be proportional to the amount of oil produced; these numbers represent about 25% (for each) of the total number of production wells and platforms anticipated to be built in the planning area over the next 40 yr as part of the OCS program. The lengths of new onshore and offshore pipeline (at most 0 km [0 mi] and 402 km [250 mi], respectively) added as part of the Program represent about 0 and 19%, respectively, of that anticipated as part of the OCS program.

The area of sea bottom disturbed from construction of platforms and pipelines over the period of the Program (as much as 430 ha [1,100 ac] in the planning areas combined) represents about 19% of that associated with the OCS program over the next 40 yr. Bottom disturbance degrades water quality by increasing water turbidity in the vicinity of the operations and adding contaminants to the water column. It also changes sediment composition as suspended sediments (and contaminants, if present) are entrained in currents and deposited in new locations.

As summarized in Section 3.4.3, the water quality in the Beaufort and Chukchi Seas is relatively uncontaminated by anthropogenic pollutants (compared to other regions that typically receive pollutants from industrial, agricultural, and municipal discharges and related runoff). The principal point sources of pollution are facilities related to the oil and gas industry, hard-rock and placer mining, military operations, and seawater treatment. Non-point sources release a

range of contaminants via rivers and onland drainages that could include contaminated runoff related to mining operations (e.g., gold mining on the Seward Peninsula). Most of these activities would remain at present levels for the foreseeable future and are not expected to affect the overall water quality in these regions.

Activities taking place within arctic waters also contribute to the degradation of water quality. These include oil spills associated with vessel traffic, sediment dredging and disposal in local harbors (suspended sediments and contaminants), and activities related to the oil and gas industry, which operates platforms in State waters and discharges drilling wastes, produced water, and other industrial waste streams into the Beaufort Sea (MMS 2008b; ADEC 2007a).

Most of the oil released to arctic waters is from leaks related to the oil industry (ADEC 2007a). Smalls spills (less than 1,000 bbl) from commercial and recreational vessels or from OCS program activities (e.g., accidental releases) are not expected to affect the overall quality of the Beaufort or Chukchi Seas because they are localized and short in duration; however, large spills (greater than 1,000 bbl) could temporarily degrade the overall quality of their water (MMS 2003a). Oil spills in ice-covered waters are generally contained within a much smaller area (compared with open-water spills) because in the cold arctic environment, oil weathering (i.e., spreading, evaporation, and migration) is much slower and some oil may solidify. While such factors have proven to be favorable for most response strategies, the presence of ice can also complicate the response strategy. Spills on ice are fairly easy to detect and map, unless there is fresh snowfall at the time of the spill; however, oil spilled within and under the ice can be hidden from view. Broken ice also makes spilled oil difficult to detect and map, and it can reduce the effectiveness of conventional recovery systems (MMS 2009b; DF Dickens Associates, Ltd. 2004).

Climate change predictions are based on models that simulate all relevant physical processes under a variety of projected greenhouse gas emission scenarios (Section 3.3). Because the complexity of modeling global and region climate systems is so great, uncertainty in climate projections can never be eliminated. Changes to the arctic climate include:

- Atmospheric temperature increases of 1 to 2°C (2–4°F) since the 1960s and continuing increases at a rate 1°C (2°F) per decade in winter and spring;
- Precipitation increases at a rate of about 1% per decade;
- Decreases in sea ice extent at a rate of about 3% per decade (since the 1970s);
- Multi-year ice decreases at a rate of about 9% per decade (since the 1980s);
- Temperatures increases at the top of the permafrost layer by up to 3°C (5°F) since the 1980s; and
- Thawing of the permafrost base at a rate of up to 0.04 m/yr (0.13 ft/yr).

The retreat of sea ice is increasing impacts on coastal areas from storms. In areas where permafrost has thawed, coastlines are more vulnerable to erosion from wave action.

Conclusion. Water quality in the Beaufort and Chukchi Seas would be affected by the following activities associated with the proposed action: vessel traffic, waste disposal, chemical releases (permitted discharges), disturbance of bottom sediments, and accidental oil spills (from vessels and the oil and gas industry). Non-OCS program activities likely to contribute to cumulative impacts include marine vessel traffic, wastewater discharge, dredging and marine disposal, oil-related, and gas-related activities and infrastructure in State-owned marine waters, and activities related to the Red Dog Mine. The cumulative impacts on arctic water from all OCS and non-OCS activities in the Arctic over the next 40 to 50 yr are expected to be moderate and the incremental contribution of the routine Program activities (such as non-OCS program oil and gas activities to water quality impacts would be minor to moderate (see Section 4.4.3.3). The number of large spills in arctic waters for most activities associated with the proposed action would represent only a small increase over the number of expected spills from ongoing OCS and non-OCS program activities. The incremental increase in adverse water quality impacts from these spills would depend on the weather and sea conditions at the spill location (e.g., whether ice is present), the type of waves and tidal energy at the spill locations, the type of oil spilled (very light to very heavy), the depth of the spill event (deep water, shallow water, or surface water), and the volume and rate of spillage. A more detailed discussion of the effects of oil spills on water quality in arctic waters is presented in Section 4.4.3.3.2.

4.6.2.3.2 Air Quality. Section 4.4.4.1 discusses air quality impacts on onshore and offshore areas of the Arctic region resulting from the proposed action (OCS program activities from 2012 to 2017). Cumulative impacts on air quality result from the incremental impacts of the proposed action when added to impacts from existing and reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities.[36] Table 4.6.1-2 presents the exploration and development scenario for the Arctic region cumulative case (encompassing the proposed action and future OCS program activities). Non-OCS program activities also contribute to adverse cumulative impacts on air quality in the region; they are discussed below.

Ongoing and future routine OCS program activities, including those of the proposed action, involve production platforms, exploration wells, platform construction and removal, marine vessels (pipelaying, support, and survey), helicopters, and tanker and barge transport. All these activities have the potential to adversely affect air quality in the Beaufort and Chukchi Seas. Accidental oil spills are also counted among OCS program-related activities; assumptions for oil spills under the cumulative case scenario are provided in Table 4.6.1-3. Existing emission sources in the Beaufort and Chukchi Sea Planning Areas include oil and gas exploration, development, and production activities in State waters (Beaufort Sea only); onshore petroleum

[36] Currently, there are no existing OCS program activities in the Beaufort and Chukchi Sea Planning Areas, but it is assumed that exploration and development activities as a result of Sale 193 (Chukchi Sea) will have occurred before commencement of the exploration and development activities associated with the proposed action (Section 4.4.1.3).

processing and refining; marine terminals (e.g., DeLong Mountain Terminal on the Chukchi Sea); aircraft traffic; and vessel traffic.

Except for a few population centers such as Anchorage, Fairbanks, and Juneau, the existing air quality in Alaska is relatively pristine with pollutant concentrations well within ambient standards (Section 3.5.2.3). This is also the case in the Chukchi and Beaufort Seas and the North Slope area, with the exception of "arctic haze," which is attributed to combustion sources in Russia (MMS 2010). The primary industrial emissions in the Beaufort and Chukchi Sea Planning Areas are associated with onshore oil development and production, offshore oil development and production (in State waters), power generation, mining (Red Dog Mine), and marine transportation. While some growth of these activities is likely to take place in the future, overall emissions are expected to remain low. More stringent emission standards on motor vehicles and new USEPA standards on non-road engines and marine vessels would result in a downward trend in emissions.

On the Alaska North Slope, the main sources of air emissions are associated with onshore oil production from the Prudhoe Bay, Kuparuk River, Colville River, Oooguruk, Milne Point, and Badami fields and oil production in State waters (Northstar and Duck Island fields). As of 2009, about 16.2 Bbbl[37] of oil have been produced from North Slope reservoirs, including the Beaufort Sea (ADNR 2009). Production from the region peaked at about 730 Mbbl in 1988 and has been in decline since then (EIA 2011c). The USDOE projects that the annual production of oil will continue to decline, from about 234 Mbbl in 2010 to 37 Mbbl in 2050 (EIA 2009q). There are a number of planned and potential future oil development projects, both onshore and in State and Federal waters in the Beaufort Sea Planning Area. There are very few other emission sources in the Chukchi Sea Planning Area.

Air monitoring at a number of sites in the Kuparuk and Prudhoe Bay fields has shown that concentrations of NO_2, SO_2, and PM_{10} are well within the NAAQS. Modeling studies for the Liberty project indicate that emissions from these areas have little effect on ambient concentrations in other locations (with maximum concentrations occurring within 100 to 200 m [330 to 660 ft] from the facility boundary and considerably lower concentrations at a distance of 1 km [0.62 mi]) (MMS 2010). For this reason, it is anticipated that emissions from new facilities would be small and localized with little interaction between facilities.

The baseline conditions and impacts from OCS activities on ozone and visibility are discussed in Sections 3.5.2.3 and 4.4.4.3, respectively. Because conditions in Alaska are seldom favorable for significant O_3 formation, the contribution of leasing activity associated with the Program to O_3 levels in the Beaufort and Chukchi Sea Planning Areas is expected to be small. OCS emission sources affecting visibility are also small.

Accidental oil spills are a source of gaseous emissions. No more than six large spills (of volume greater than 1,000 bbl) and 450 small spills (of volume less than 50 bbl) are projected for the Beaufort and Chukchi Sea Planning Areas cumulative case as a result of the OCS program (Table 4.6.1-3). Most of the accidental spills in the North Slope region are of non-crude

[37] Historic figures include both oil and natural gas liquids produced at Prudhoe Bay and surrounding fields.

products during fuel transfer operations at remote villages (ADEC 2007a). While there is no discernable trend in the annual number of spills or total volume released, there is a seasonal pattern to spill events, with increases occurring during winter months (likely coinciding with increased exploration activities). Since 1976, there have been no major crude oil spills in arctic waters (State of Alaska 2011). Oil spills cause localized increases in VOC concentrations (proportional to the size of the spill) due to evaporation. Most of these emissions would be expected to occur within a few hours of the spill and decrease (by dissipation) drastically after that period (MMS 2010). However, oil spills in ice-covered waters during winter months would be contained within a much smaller area (compared with spills in open waters) because oil weathering (i.e., spreading, evaporation, and migration) is much slower and some oil may solidify (MMS 2009b). A more detailed discussion of the effects of oil spills on air quality in the Arctic region is presented in Section 4.4.4.3.

Catastrophic events at well locations may result in fires; *in situ* burning is also a preferred technique for cleanup and disposal of oil spills (documented in oil spill contingency plans). Smoke generated from such fires would be expected to reach shore quickly (within a day), but would be limited in geographic extent (MMS 2003a). A discussion of the effects of fires on air quality in the Arctic region is presented in Section 4.4.4.3.

Conclusion. OCS program activities in combination with other oil and gas exploration, development, and production activities in the Beaufort and Chukchi Sea Planning Areas could affect air quality in the region. Air pollutant concentrations associated with offshore and onshore emission sources are expected to remain well within applicable State and Federal standards over the life of the Program. Therefore, the overall cumulative impacts on air quality in the Beaufort and Chukchi Sea Planning Areas are expected to be minor to moderate, and the incremental contribution of routine Program activities to air quality impacts would be small (see Section 4.4.4.3).

Impacts from the evaporation of accidental oil spills for the cumulative case would be similar to those for the Program (see Section 4.4.4.3.2). Since impacts from individual spills would be localized and temporary (because in the cold arctic environment oil weathering is slower and some oil may solidify), the magnitude of their impacts would be no different from those associated with the proposed action. However, as many as 80 small (greater than 50 bbl and less than 1,000 bbl) and eight large oil spills are projected to occur over the next 40 to 50 yr. Impacts from fires would also be localized and short in duration. A more detailed discussion of the effects of oil spills on air quality in the Arctic region is presented in Section 4.4.4.3.2.

4.6.2.3.3 Acoustic Environment. Section 4.4.5.3 discusses impacts on the acoustic environment in the Arctic region resulting from the proposed action (OCS program activities from 2012 to 2017). Section 4.4.7 evaluates the direct and indirect impacts of noise on marine fauna (mammals, birds, and fish), and Section 4.6.4 addresses the cumulative impacts of noise on marine fauna. Cumulative impacts on the acoustic environment result from the incremental impacts of the proposed action when added to impacts from reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program

activities.[38] Table 4.6.1-1 presents the exploration and development scenario for the Beaufort Sea and Chukchi Sea Planning Areas cumulative case (encompassing the proposed action and other OCS program activities). Ongoing and reasonably foreseeable non-OCS program activities contributing to adverse cumulative impacts on the acoustic environment in the Arctic region include aircraft overflights, vessel activities and traffic, construction of onshore and offshore facilities (e.g., related to ongoing oil and gas exploration and development in State waters), and other activities (e.g., seismic surveys) conducted as part of the existing oil and gas industry in the Beaufort and Chukchi Seas. This section addresses the quality of the acoustic environment only; the cumulative impacts of noise on marine fauna in the Beaufort and Chukchi Seas are discussed in Section 4.6.4.3.

Ambient (background) noise has numerous natural and manmade sources that vary with respect to season, location, depth of occurrence, time of day, and noise characteristics (e.g., frequency and duration).[39] Natural sources of ambient noise include wind and wave action, currents, ice, precipitation (rain and hail), lightening, and biological noise (from marine mammals and coastal birds). Vessels (e.g., tankers, supply ships, tugboats, barges, and fishing boats) are the greatest man-made contributors to overall marine noise in the Arctic region. Baseline acoustic conditions in the region are discussed in more detail in Section 3.6.3.

Ongoing and future routine OCS program activities, including those of the proposed action, that generate noise include operating air gun arrays (during marine seismic surveys), drilling, pipeline trenching, and onshore and offshore construction and decommissioning of platforms (including artificial islands and causeways), and drilling rigs. Vessel and aircraft traffic (including that associated with emergency response and cleanup activities in the event of a spill), accidental releases (e.g., loss of well control events), and vessel collisions also contribute to noise. A preliminary study of the noise impacts of OCS related geophysical surveys found that marine seismic surveys have the greatest impact on marine mammals, sea turtles, fish, and commercial and recreational fisheries (MMS 2004a). Noise generated from OCS and non-OCS program activities would be transmitted through both air and water, and may be transient or more extended (occurring over the long term).

Conclusion. The quality of the acoustic environment in the Beaufort and Chukchi Seas would continue to be adversely affected by ongoing and future non-OCS program activities and by future OCS program activities (currently there are no existing OCS activities). Activities under the proposed action would contribute to adverse cumulative impacts on the quality of the acoustic environment in the Arctic region. The magnitude of cumulative impacts due to noise in the Beaufort and Chukchi Seas from all OCS and non-OCS activities in the Arctic over the next 40 to 50 yr is time- and location-specific and could range from minor to major, depending on the ambient acoustic conditions and the nature of activities taking place. The incremental

[38] Currently, there are no existing OCS program activities in the Beaufort Sea and Chukchi Sea Planning Areas, but it is assumed that exploration and development activities as a result of Sale 193 (Chukchi Sea) will have occurred before the proposed action (Section 4.4.1.3).

[39] Higher frequencies are attenuated with distance from the source more rapidly than lower frequencies. Traffic noise generated in deep water contributes to background noise levels at greater distances than traffic noise generated in shallow water.

contribution due to noise generated by the routine Program activities (minor impacts) would vary with time and location and would depend on the characteristics of noise sources present (e.g., their frequency and duration). The cumulative impacts of noise on marine fauna are discussed in Section 4.6.4.

4.6.3 Marine and Coastal Habitats

4.6.3.1 Gulf of Mexico Region

4.6.3.1.1 Coastal and Estuarine Habitats. A number of activities associated with the proposed action could result in impacts on coastal and estuarine habitats (Section 4.4.6.1). These activities include construction of pipelines and shoreline facilities, maintenance dredging of inlets and channels, and vessel traffic. Impacts associated with these activities could include (1) losses of beach and dune habitat and indirect effects that contribute to reductions in beach habitat in areas of ongoing shoreline degradation; and (2) elimination of wetland habitat and indirect effects that contribute to reductions in wetland habitat. Similar activities will be occurring from previous and future sales during the life of the Program (see Table 4.6.1-1). Excluding the estimated number of offshore pipelines installed, which is not relevant to this analysis, the activities associated with the proposed action will be about 15–30% of the total amount of OCS program activity that will occur during the life of the Program.

Barrier Beaches and Dunes. Impacts on barrier beaches and dunes primarily result from factors that reduce sediment input to downdrift areas or that directly contribute to increased erosion of beaches and dunes. Construction projects may reduce the sediment contribution to the GOM barrier landforms from inflowing rivers, or they may restrict the movement of sediments to downdrift areas and natural replenishment of barrier beaches. Other activities may disturb barrier dune vegetation, thereby promoting dune erosion, or directly disturb beach and dune substrates, resulting in increased erosion of beaches and dunes. Increases in wave action can also contribute to beach erosion.

Ongoing non-OCS activities that could affect barrier beaches and dunes include those related to State oil development, commercial shipping, coastal development, and recreation. These activities can be reasonably expected to continue into the future. A number of activities reduce the sediment supply to barrier beaches and dunes. Past activities that have contributed to sediment deprivation and submergence of coastal lands have contributed to erosion and land losses, particularly along the Louisiana coast, and are expected to continue into the foreseeable future. Channelization and diversion of Mississippi River flows, as well as the construction of Mississippi River dams and reservoirs, and subsequent reductions in sediment supply to deltaic areas to the west have resulted in the continued extensive erosion of coastal habitats. Past construction of dams on other rivers discharging to the western GOM has also resulted in a reduction in sediments delivered to the coast, which, along with natural causes of sediment supply reductions, have resulted in ongoing land loss along the Texas coast. The emplacement of groins, jetties, and seawalls for beach stabilization in much of the GOM contributes to the

reduction of sediment inputs and the acceleration of coastal erosion in downdrift areas. Maintenance dredging of barrier inlets and bar channels, in combination with channel jetties, has resulted in impacts on adjacent barrier beaches down-current due to sediment deprivation, especially on the sediment-starved coastal areas of Louisiana. Maintenance dredging is an ongoing practice and is expected to continue to be an impacting factor into the future; this includes, for example, efforts to accommodate larger cargo vessels. The past construction of canals for pipelines and navigation has resulted in losses of coastal barrier habitat. Although new navigation canals from the GOM to inland areas are unlikely to be needed and current pipeline construction methods result in little, if any, impacts on barrier landforms, existing pipeline canals are expected to continue to be sediment sinks and to promote the reduction of adjacent barrier island dunes and beaches. However, the replenishment of barrier beaches with sand obtained from OCS sources and the beneficial use of dredged material are expected to continue to aid in the restoration of barrier islands. The impacts on barrier beaches and dunes from sediment removal activities associated with maintenance dredging under the proposed action would represent a very small contribution to the past, ongoing, and expected future degradation of barrier beaches and dunes from non-OCS activities.

Although coastal barrier islands in most of the Central GOM Planning Area generally receive minimal recreational use, most barrier beaches in Texas, Alabama, and Florida are accessible and extensively used for recreation. Pedestrian and vehicular traffic on beaches and dunes can destabilize substrates, either by reducing vegetation density—and thus increasing erosion by wind, waves, and traffic—or by directly disturbing or displacing substrates. In addition, considerable private and commercial development has occurred on many barrier islands in the GOM, resulting in losses of beach and dune habitat. The impacts on barrier beaches and dunes from substrate-disturbance activities associated with pipeline construction under the proposed action are expected to be greatly minimized by non-intrusive construction techniques and would not be expected to appreciably add to the cumulative effects of other substrate-disturbing activities.

Activities that increase wave action along barrier beaches and dunes can contribute to their erosion. The construction of seawalls, groins, and jetties in Texas and Louisiana has contributed to coastal erosion in part by increasing or redirecting the erosional energy of waves. Vessel traffic related to shipping and transportation can result in wake erosion of channels between barrier islands. A large number of vessels use the navigation channels near the GOM coast. A portion of the impacts related to vessel traffic would be associated with the proposed action; however, activities conducted under the proposed action would contribute a relatively small number of vessel trips to the total.

Barrier beaches and dunes could be impacted by accidental spills of oil or petroleum products resulting from cumulative OCS activities (Section 4.6.1.1). Although the majority of these spills would be small (less than 50 bbl), catastrophic releases can impact extensive areas of shoreline. Oil released into coastal waters as a result of the DWH event, April–July 2010, affected more than 1,046 km (650 mi) of the GOM coastal habitat, from the Mississippi River delta to the Florida panhandle, with the Louisiana, Mississippi, Alabama, and Florida coasts all affected (OSAT-2 2011; National Commission 2011). The greatest impacts were in Louisiana. More than 209 km (130 mi) of coastal habitat were moderately to heavily oiled, with only 32 km

(20 mi) occurring outside of Louisiana (National Commission 2011). Little or no oil affected Texas coastal habitats. Heavy to moderate oiling occurred along a substantial number of Louisiana beaches, with the heaviest oiling on the Mississippi Delta, in Barataria Bay, and on the Chandeleur Islands (OSAT-2 2011). The majority of Mississippi barrier islands had light oiling to trace oil, although heavy to moderate oiling occurred in some areas. Some heavy to moderate oiling also occurred on beaches in Alabama and Florida, with the heaviest stretch of oiling extending from Dauphin Island, Alabama, to near Gulf Breeze, Florida (OSAT-2 2011). Light to trace oiling occurred from Gulf Breeze to Panama City, Florida. Deposition of oil occurred in the supratidal zone (above the high tide mark), deposited and buried during storm events; intertidal zone; and subtidal zone, there remaining as submerged oil mats (OSAT-2 2011). On Grand Isle, Louisiana, and Bon Secour, Alabama, oil was found up to 105 cm (41 in.) below the surface (OSAT-2 2011). Although much of the oil remaining after cleanup is highly weathered, several constituents have the potential to cause toxicological effects (OSAT-2 2011). Non-OCS activities, such as the domestic transportation of oil, foreign crude oil imports, and State oil development may also result in accidental spills that could potentially impact coastal barrier beaches and dunes. The amount of oil contacting barrier islands from a spill would depend on a number of factors such as the location and size of the spill, waves and water currents, and containment actions. Naturally occurring seeps may also be a source of crude oil introduced into GOM waters (NRC 2003b; Kvenvolden and Cooper 2003). The magnitude of resulting impacts and the persistence of oil would depend on factors such as the amount of oil deposited, remediation efforts, substrate grain size, and localized erosion and deposition patterns. In areas of barrier beach erosion, such as Louisiana, remediation would likely include the minimization of sand removal or replacement of removed sand. The impacts of potential oil spills associated with the proposed action would be expected to add a small contribution to the impacts of other sources of oil.

Indirect effects on coastal barrier beaches and dunes could result from global climate change. Factors associated with global climate change include changes in temperature and rainfall, alteration in stream flow and river discharge, sea level rise, changes in hurricane frequency and strength, sediment yield, mass movement frequencies and coastal erosion, and subsidence (Yanez-Arancibia and Day 2004). Potential thermal expansion of ocean water and melting of glaciers and ice caps could result in a global rise in mean sea level (Section 4.6.1.6). Recent rates of sea level rise have been approximately 3 mm/yr (0.12 in./yr), but this rate may increase to 4 mm/yr (0.16 in./yr) by 2100 (Blum and Roberts 2009). Sea-level rise could result in increased inundation of barrier beaches and increases in losses of beach habitat. Effects of sea level rise include damage from inundation, floods and storms; and erosion (Nicholls et al. 2007). Effects of increased storm intensity include increases in extreme water levels and wave heights; increases in episodic erosion, storm damage, risk of flooding, and defence failure (Nicholls et al. 2007). Patterns of erosion and accretion can also be altered along coastlines (Nicholls et al. 2007). The small tidal range of the GOM coast increases the vulnerability of coastal habitats to the effects of climate change.

Hurricanes and other severe storm events can affect coastal barrier beaches and dunes. Increased wave action and intensity on barrier habitats may result in increased erosion and changes in beach and dune topography or losses of habitat. Hurricanes and tropical storms are inherent components of the GOM ecosystem that have long influenced coastal habitats and are

expected to continue to be sources of impacts. Anthropogenic impacts on barrier beaches and dunes may be greatly exacerbated by severe storm events such as hurricanes. In 2005, Hurricanes Katrina and Rita caused extensive erosion of barrier landforms in the central and western GOM. Extreme storms such as these can result in relatively permanent change to these habitats, particularly in areas that are already experiencing erosion and retreat as a result of sediment deprivation, sea level rise, and coastal development.

Wetlands. Factors that affect coastal wetlands include the direct elimination of wetland habitat by excavation or filling, the reduction of sediment inputs, the erosion of wetland substrates, and the degradation of wetland communities by reduced water quality or hydrologic changes. Construction projects may fill wetlands for facility siting or excavate wetlands for the construction of canals or pipelines. Other projects may reduce the sediment delivered to coastal wetlands from inflowing rivers. A number of activities may degrade wetlands or promote wetland losses indirectly by causing changes to wetland hydrology or introducing contaminants. Routine OCS operations could have direct impacts on wetlands as a result of direct losses of habitat from construction activities, pipeline landfalls and channel dredging, and indirect impacts as a result of altered hydrology caused by channel dredging.

Ongoing non-OCS activities that could affect coastal wetlands include those related to State oil and gas development, commercial shipping, coastal development, dredging operations, discharge of municipal wastes and other effluents, domestic transportation of oil and gas, and foreign crude oil imports. These activities can be reasonably expected to continue into the future. A number of these activities result in the localized destruction of wetlands. The construction of pipelines and navigation channels would result in direct losses of wetlands that are crossed, due to excavation. In addition, the creation of spoil banks along canals would bury wetland habitat. Large areas of coastal wetlands are also lost by drainage and filling, due to urban development and agricultural use (Gosselink et al. 1979; Bahr and Wascom 1984). Although activities that impact wetlands are regulated by State and Federal agencies, construction of industrial facilities, commercial sites, and residential developments would be expected to result in continued wetland losses. Pipeline installation and vessel traffic outside of established traffic routes could have short-term impacts on seagrass communities, which are primarily located in the eastern GOM. The direct impacts on coastal wetlands from pipeline, navigation canal, or facility construction under the proposed action would represent a small contribution to the past, ongoing, and expected future losses of wetlands from non-OCS activities.

Indirect impacts on wetlands from non-OCS activities are expected to continue to contribute to wetland degradation and conversion of wetlands to open water. A major factor that has contributed to the ongoing loss of coastal wetlands, particularly in the Mississippi River Delta region of Louisiana, is the reduction in sediments provided to coastal marshes. Reductions in sediment supply, in combination with natural subsidence, have contributed significantly to the conversion of coastal marsh to open water. The construction of dams and levees and channelization along the Mississippi River restrict the sediment supply and overbank flow of floodwaters, limiting the release of sediments and fresh water to coastal marshes (LCWCRTF 1998, 2003; USACE 2004).

Coastal wetlands are also lost due to the effects of large storm events, and the continuing erosion of barrier islands reduces their capacity to act as buffers for coastal wetlands (LCWCRTF 2001). Construction of canals for pipelines and navigation would result in future continuing progressive losses from canal widening and failure of mitigation structures, which would contribute to the conversion of wetlands to open water. Canal construction and maintenance dredging of navigation canals result in hydrologic changes, primarily high levels of tidal and storm flushing and draining potential of interior wetland areas. Such alterations of water movement can result in erosion of marsh substrates and increase inundation levels, and can result in substantial impacts on the hydrologic basin. Construction and maintenance of canals through coastal wetlands can increase the impacts of coastal storms, such as hurricanes, in the conversion of wetlands to open water. Saltwater intrusion results from canal construction and reduced freshwater inputs due to river channelization, and causes considerable deterioration of coastal wetlands. Wetland losses due to subsidence have also been attributed to extraction of oil in some portions of the Mississippi River Delta, or the withdrawal of groundwater along the Texas coast. Changes in wetland hydrology, as well as increases in turbidity and sedimentation, as a result of construction projects, can affect wetlands.

Degradation of wetlands can result from water quality impacts due to stormwater discharges and discharges of waste water from vessels, municipal treatment plants, and industrial facilities. Water quality may also be impacted by waste storage and disposal sites. The direct and indirect impacts on coastal wetlands under the proposed action would represent a small contribution to the past, ongoing, and expected future impacts on wetlands from non-OCS activities.

Accidental spills of oil or petroleum products from OCS activities (Section 4.4.6.1) could impact coastal wetlands. The majority of these spills would be small (less than 50 bbl). Should spills occur in shallow water from vessel accidents and pipelines, they could contact and affect coastal wetlands. Most spills that occur in deep water would be unlikely to contact and impact wetlands. Catastrophic releases in deep water, however, can impact extensive areas of shoreline. Oil released into coastal waters as a result of the DWH event, April–July 2010, affected more than 1,046 km (650 mi) of the GOM coastal habitat, from the Mississippi River delta to the Florida panhandle, with the Louisiana, Mississippi, Alabama, and Florida coasts all affected (OSAT-2 2011; National Commission 2011). Non-OCS activities, such as State oil development, the domestic transportation of oil, and foreign crude oil imports, may also result in accidental spills that could potentially impact coastal wetlands. Naturally occurring seeps may also be a source of crude oil that could potentially affect coastal wetlands. The amount of oil contacting wetlands, the magnitude of resulting impacts, and the length of time for recovery would depend on a number of factors such as the location and size of the spill, containment actions, waves and water currents, type of oil, types of remediation efforts, amount of oil deposition, duration of exposure, season, substrate type, and extent of oil penetration. Impacts from oil spills would be expected to range from short-term effects on vegetation growth to permanent loss of wetlands and conversion to open water. The impacts of potential oil spills associated with the proposed action would be expected to constitute a small addition to the impacts of all other sources of oil in the GOM.

Global climate change could result in indirect effects on coastal wetlands. Factors associated with global climate change include changes in temperature and rainfall, alteration in stream flow and river discharge, wetland loss, salinity, sea level rise, changes in hurricane frequency and strength, sediment yield, mass movement frequencies and coastal erosion, and subsidence (Yanez-Arancibia and Day 2004). Effects of sea level rise include damage from inundation, floods and storms; erosion; saltwater intrusion; rising water tables/impeded drainage; and wetland loss and change (Nicholls et al. 2007). Effects of increased storm intensity include increases in extreme water levels and wave heights; increases in episodic erosion, storm damage, risk of flooding, and defence failure (Nicholls et al. 2007). Patterns of erosion and accretion can also be altered along coastlines (Nicholls et al. 2007). The small tidal range of the GOM coast increases the vulnerability of coastal habitats to the effects of climate change. A study of coastal vulnerability along the entire U.S. GOM coast found that 42% of the shoreline mapped was classified as being at very high risk of coastal change due to factors associated with future sea level rise (Thieler and Hammar-Klose 2000). A revised coastal vulnerability index study of the coast from Galveston, Texas, to Panama City, Florida, indicated that 61% of that mapped coastline was classified as being at very high vulnerability, with coastal Louisiana being the most vulnerable area of this coastline (Pendleton et al. 2010). Potential thermal expansion of ocean water and melting of glaciers and ice caps could result in a global rise in mean sea level (Section 4.6.1.6). Sea level rise would result in greater inundation of coastal wetlands and likely result in an acceleration of coastal wetland losses, particularly in Louisiana, as wetlands are converted to open water. In addition, large changes in river flows into the GOM could affect salinity and water circulation in estuaries, which, in turn, could impact estuarine wetland communities.

Hurricanes and other severe storm events impact coastal wetlands through increased wave action and intensity, resulting in increased erosion of wetland substrates and conversion of coastal wetlands to open water. Hurricanes and tropical storms are inherent components of the GOM ecosystem that have long influenced coastal habitats and are expected to be continuing sources of impacts. However, impacts on wetlands as a result of human activities, such as those that create marsh openings that enhance tidal and storm-driven water movements, may be amplified by severe storm events such as hurricanes. In 2005, Hurricanes Katrina and Rita caused extensive impacts on wetlands in the Central and Western GOM. For example, up to 259 km^2 (100 mi^2) of coastal wetlands in Louisiana may have been converted to open water as a result of the storms, and up to 60,700 ha (150,000 ac) of coastal wetlands and bottomland forests were damaged in national wildlife refuges along the GOM coast (FWS 2006). It is possible that extreme storms such as these could result in relatively permanent change to these habitats, particularly in areas that are already experiencing erosion and conversion of wetlands to open water as a result of sediment deprivation, sea-level rise, channelization, and coastal development.

Seagrass Beds. As identified in Section 4.4.6.1, the principal OCS activities under the proposed action that could potentially affect seagrass beds include placement of structures (e.g., pipelines) and vessel traffic within the vicinity of the beds. In addition, coastal development associated with OCS oil and gas activities could contribute to cumulative impacts on submerged seagrass beds. Most of the seagrass beds in the GOM are in the Eastern GOM Planning Area, where no OCS activities are proposed during the Program.

Non-OCS activities that may contribute to cumulative effects on seagrass habitats include anchoring, fishing/trawling, offshore shipping, diving, and continued onshore development. The extensive seagrass beds located in the eastern GOM may be susceptible to impacts from non-OCS activities such as dredging and onshore development that contribute to increased sedimentation, turbidity, nutrient input, and various types of point and non-point source contamination.

As noted in Section 4.4.6.1, oil spills reaching coastal areas could affect submerged seagrass beds. The majority of these spills would be small (less than 50 bbl). Should spills occur in shallow water from vessel accidents and pipelines, they could contact and affect seagrass beds. Most spills that occur in deep water would be very unlikely to contact and impact seagrasses; however, catastrophic releases can impact extensive areas of shoreline. As identified in Table 4.6.1-3, it is assumed that up to 40 large oil spills (>1,000 bbl), up to 330 small-sized spills 50 to 999 bbl, and up to 1,950 small oil spills of less than 50 bbl could occur as a result of ongoing and currently planned OCS activities. A catastrophic spill event would have an assumed spill size of 4,000,000 bbl. As discussed previously, non-OCS activities and oil seeps could also contribute substantially to releases of oil in the GOM. Oil spills in shallow water in the GOM from OCS and non-OCS activities could have significant effects on submerged seagrass beds. The magnitude and severity of potential effects on seagrass beds from oil spills would be a function of the location, timing, duration, and size of the spill; the proximity of the spill to seagrass beds; and the timing and nature of spill containment and cleanup activities. Releases that occur in the shallow portions of the eastern GOM have the potential to be of greatest significance, due to the more extensive growth of seagrasses along that coastline. It is unlikely that OCS spills would contact the extensive seagrass areas offshore Florida and along its coast because of the great distance between these resources and locations in the Central and Western GOM Planning Areas where leasing will occur.

Conclusion. Ongoing OCS and non-OCS program activities in combination with naturally occurring events have resulted in considerable losses of coastal and estuarine habitats in the GOM; cumulative impacts on these resources, therefore, are considered to be moderate to major. Operations under the proposed action would result in small localized impacts, primarily due to facility construction, pipeline landfalls, channel dredging, and vessel traffic; however, the incremental contribution of routine Program activities to cumulative impacts would be small (see Section 4.4.6.1.1).

The cumulative impacts of past, present, and future oil spills and natural seeps on submerged seagrass beds would be moderate to major. The incremental impacts of accidental oil spills associated with the proposed action on seagrass beds would be small to large, depending on the location, timing, duration, and size of the spill; the proximity of the spill to seagrass beds; and the timing and nature of spill containment and cleanup activities (see Section 4.4.6.1.1). The majority of these spills would be small (less than 50 bbl). Large oil releases that occur in or reach shallower nearshore areas have the greatest potential to affect coastal and estuarine habitats. Most spills would be unlikely to contact and affect coastal and estuarine habitats. Large oil spills and catastrophic discharge events, however, can affect extensive areas of shoreline.

4.6.3.1.2 Marine Benthic and Pelagic Habitats. Cumulative impacts could result from the combination of the proposed action and past, present, and reasonably foreseeable future OCS and non-OCS activities. Impacts on marine benthic and pelagic habitat resulting from ongoing and future routine OCS program activities, including those of the proposed action, could result from noise (vessel, seismic surveys, and construction), well drilling, pipeline placement (trenching, landfalls, and construction), platform placement (anchoring, mooring, and removal, except in deep waters) and routine discharges (drilling, production, platform, and vessel). Accidental oil spills are also counted among OCS program-related activities.

Up to 12,000 development and production wells and 2,000 oil platforms are anticipated to be built in the GOM under the cumulative scenario (Table 4.6.1-1). In addition, up to 69,200 km (43,000 mi) of offshore pipeline could be added. The construction of platforms and pipelines would disturb as much as 81,000 ha (200,200 ac) in total over the next 40 to 50 yr (Table 4.6.1-1). Bottom disturbance resulting from the proposed action may degrade water quality by increasing water turbidity in the vicinity of the operations and adding contaminants to the water column. It also changes sediment composition as suspended sediments (and contaminants, if present) are entrained in currents and deposited in new locations. The increased amount of drilling anticipated under the proposed action will result in OCS discharges of drill muds, cuttings, and produced waters. Impacts of OCS routine operations (exploration, production and decommissioning activities) on marine benthic and pelagic habitat are discussed in detail in Sections 4.4.6.2.1 and 4.4.6.3.1. Overall, routine operations represent a negligible to moderate long-term disturbance, with the severity of the impacts generally decreasing dramatically with distance from the well site.

Non-OCS activities with a potential to impact marine benthic and pelagic habitats in the GOM include sediment dredging and disposal, sand mining, anchoring, fishing/trawling, and tankering of imported oil. Anchoring by non-OCS vessels could cause significant chronic disturbance the benthic habitat and biota and temporarily reduce water quality by generating turbidity in the water column. Anchoring could involve boats used for recreational and commercial fishing or scuba diving, and commercial ship traffic. The amount of damage that could result from anchoring activity would depend upon vessel size, the size of the anchor and chain, sea conditions at the time of anchoring, and the location or position of the anchor on the feature. Areas damaged by anchors may take more than 10 years to recover, depending upon the severity of the damage. Due to a lack of regulation of non-OCS activities on these features, there is a likelihood of damages increasing due to heavier usage of the resources in the future. Sand mining and dredging operations in conjunction with ship channel maintenance and construction, pipeline placement and burial, and support facility access occur throughout the GOM as part of non-OCS activities. Sediments dredged and sidecast or transported to approved dredged material disposal sites would alter bottom habitat and communities and remove, injure, or kill local biotic communities in addition to generating turbidity over the length of the water column. Similarly, bottom trawling degrades benthic habitats and temporarily increases the turbidity of the water (Jones 1992).

Other non-OCS activities with a potential to impact marine benthic and pelagic habitats include offshore marine transportation, and pollutant inputs from point and non-point sources. Vessel traffic is a source of chronic noise that could temporarily and episodically reduce local

habitat quality by disturbing pelagic and shallow water benthic organisms. Multiple contaminant sources exist from nearshore point sources and contaminants can also be delivered to the continental shelf during storms and high river discharge. A primary example is the cultural eutrophication of the GOM, which has resulted in a large seasonal hypoxic zone off the coasts of Louisiana and Texas and restricts the use of benthic and bottom water habitat by marine biota over a wide area. In addition to non-point source pollution, LNG terminal operations (biocide-laden, cooled water), and activities related to the oil and gas industry, which operates hundreds of platforms in State and Federal waters, discharges large volumes of drilling wastes, produced water, and other industrial waste streams to GOM waters. Pollutant inputs into the GOM and their impact on water quality are discussed in Section 4.6.2.1. The impacts of these activities on marine pelagic habitat can be temporary or long term and could result in reduced habitat quality for marine biota.

In the benthic and pelagic habitats of the GOM, climate change may cause the temporal variability of key chemical and physical parameters — particularly hydrology, dissolved oxygen, salinity, and temperature — to change or increase, which could significantly alter the existing structure of the benthic and phytoplankton communities (Rabalais et al. 2010). For example, freshwater discharge into the GOM has been increasing and is expected to continue to increase as a result of the increased rainfall in the Mississippi River Basin (Dai et al. 2009). Such changes could result in severe long-term or short-term fluctuations in temperature and salinity that could reduce or eliminate sensitive species. Such changes are most likely to occur in the Mississippi Estuarine Ecoregion, where freshwater inputs are highest. In addition, greater rainfall may increase inputs of nutrients into the GOM, potentially resulting in more intense phytoplankton blooms that could promote benthic hypoxia (Rabalais et al. 2010). Hypoxic or anoxic conditions can reduce or eliminate the suitability of benthic habitat for marine organisms.

Marine benthic and pelagic habitat and biota could be affected by oil spills from both OCS program activities and non-OCS activities such as the domestic transportation of oil, the import of foreign crude oil, and State development of oil. Storms, operator error, and mechanical failures may result in accidental oil releases from a variety of non-OCS related activities. Assumptions for oil spills under the cumulative case scenario are provided in Table 4.6.2-3, and for catastrophic spills, in Table 4.4.2-2. Large and potentially catastrophic spills could result from pipeline ruptures, tanker spills associated with an FPSO system, or loss of well control. In addition, crude oil enters the environment of the GOM from naturally occurring seeps. At least 63 seeps have been identified in the GOM (mostly off the coast of Louisiana) (MacDonald et al. 1996), and more than 350 naturally occurring and constant oil seeps that produce perennial slicks of oil at consistent locations may be present in the GOM (MacDonald and Leifer 2002, as cited in Kvenvolden and Cooper 2003). Seeps in the northern GOM have been estimated to discharge more than 28,000 bbl of crude oil annually to overlying GOM waters (MacDonald 1998b).

For both OCS and non-OCS oil spills, it is assumed that the magnitude and severity of the potential effects on benthic and pelagic habitat would be a function of the location, timing, duration, and size of the spill and the timing and nature of spill containment and cleanup activities. Detailed discussion of the impacts of OCS accidental hydrocarbon releases on marine benthic and pelagic habitat can be found in Sections 4.4.6.2.1 and 4.4.6.3.1.

Coral Reefs and Hard-Bottom Habitat. Sensitive coral reef and hard-bottom benthic habitats in the GOM may be more susceptible to OCS impacts and take longer to recover if impacts were to occur. Consequently, these habitats receive special protection. Four coral reef and hard-bottom habitats are designated for the various protections: (1) banks offshore of Texas and Louisiana (including the FGBNMS), (2) the Pinnacle Trend off the Louisiana-Alabama coast, (3) seagrass and low-relief live-bottom areas primarily located in the Central and Eastern Planning Areas, and (4) potentially sensitive biological features of moderate to high relief that are not protected by (1) and (2). As identified in Section 4.4.6.2.1, NTL No. 2009-G39 has several protections in place to minimize and mitigate the adverse effects of oil and gas exploration and development on coral reefs and hard-bottom habitat.

Cumulative impact factors for coral reef and hard-bottom habitat include both OCS and non-OCS cumulative activities. Impacts of OCS exploration, production and decommissioning activities on coral reefs and hard-bottom habitat could result from noise, well drilling, pipeline placement (trenching, landfalls, and construction), chemical releases (drilling discharges, operation discharges, and sanitary wastes), and platforms placement (anchoring, mooring, and removal, except in deepwaters). Impacts of OCS exploration, production and decommissioning activities on marine benthic and pelagic habitat are discussed in detail in Section 4.4.6.2.1. Overall, impacts on coral reef and live-bottom habitat from routine activities should be minimized by the protection stipulated by NTL 2009-G39. However, low-relief or small, isolated, unmapped live-bottom could be affected by direct mechanical damage and turbidity and sedimentation.

Non-OCS activities with a potential to impact these habitats include anchoring by non-OCS activity vessels, fishing/trawling, discharges by non-OCS offshore marine transportation, and tankering of imported oil. Anchoring could involve boats used for recreational and commercial fishing or scuba diving, and commercial ship traffic. The amount of damage that could result from anchoring activity would depend upon vessel size, the size of the anchor and chain, sea conditions at the time of anchoring, and the location or position of the anchor on the feature. Recovery of areas damaged by anchors may be long term, depending upon the severity of the damage. Due to a lack of regulation of non-OCS activities on these features, there is a likelihood of damages increasing due to heavier usage of the resources in the future.

Trawling activities are another source of damage to coral and hardbottom habitat. Because anchoring and collection activities by scuba divers on the living reef areas of the Flower Garden Banks are prohibited, biota associated with the Flower Garden Banks are unlikely to be significantly affected by these activities. Similarly, use of spiny lobster and stone crab traps may also damage bottom substrate such as seagrasses and corals. Strings of traps deployed without buoys are sometimes retrieved by dragging 18-kg (40-lb) grapnels and chains across the bottom until the trap string is hooked, potentially damaging bottom habitats in the process.

Impacts could also occur due to discharges from other non-OCS activities, including tankers or other marine traffic passing in the vicinity of coral reef and hard-bottom habitat. Because water depths are typically greater than 20 m (66 ft) at the tops of most of the banks, dilution of discharges would greatly reduce concentrations of potentially toxic components

before they could come in contact with these features; consequently, it is assumed that discharges from such activities would not be concentrated enough to reduce habitat quality.

Climate change has the potential to profoundly affect coral communities on coral and hard-bottom features in several ways including (Section 3.7.1.1.4):

- Increased frequency of bleaching as a stress response to warming water temperatures (Hoegh-Guldberg et al. 2007);
- Excessive algal growth on reefs and an increase in bacterial, fungal, and viral agents (Boesch et al. 2000; Twilley et al. 2001);
- Greater frequency of mechanical damage to corals from greater severity of tropical storms and hurricanes (Janetos et al. 2008);
- Decreases in the oceanic pH and carbonate concentration are expected to reduce the reef formation rate, weaken the existing reef structure, and alter the composition of coral communities (Janetos et al. 2008); and

In addition, climate change may allow the range expansion of non-native species. Many of the decommissioned platforms will be converted into artificial reefs. By acting as stepping stones across the GOM, oil platforms have been implicated in the introduction of a non-native coral species (*Tubastraea coccinea*) and fishes such as sergeant majors (*Abudefduf saxatilis*) and yellowtail snapper (*Ocyurus chrysurus*) into the FGB (Hickerson et al. 2008).

Oil spills from both OCS and non-OCS activities could affect coral reef and hard-bottom habitat and biota. Detailed discussion of the impacts of OCS accidental hydrocarbon releases on hard-bottom and coral reef habitat can be found in Section 4.4.6.2.1. It is assumed that accidental oil releases from most non-OCS activities would be at the surface or located sufficiently far from coral reef and hard-bottom habitat and biota that they would be unlikely to greatly affect these habitats. The magnitude and severity of potential effects on coral reef and hard-bottom habitat and biota from such exposure would be a function of the location, timing, duration, and size of the spill; the proximity of the spill to the features; and the timing and nature of spill containment and cleanup activities. Depending upon location, spills from non-OCS sources and releases from natural seeps could contribute to the overall exposure of communities associated with topographic features in the GOM OCS planning areas to oil, with corresponding lethal or sublethal effects.

High Density Deepwater Communities (HDDC). High density deepwater communities (HDDCs) include coldwater corals and chemosynthetic communities. Cumulative impact factors for HDDCs include both OCS and non-OCS cumulative activities. Potential impacts on HDDCs resulting from ongoing and future routine OCS program activities, including those of the proposed action, could result from noise, well drilling, pipeline placement (trenching, landfalls, and construction), chemical releases (drilling discharges, operation discharges, and sanitary wastes), and platform placement (anchoring, mooring, and removal, except in deep waters). Mitigation measures instituted to protect these HDDCs include Notice to Lessee (NTL) 2009-

G40, which requires the avoidance of HDDCs or areas that have a high potential for supporting these community types, as interpreted from geophysical records. Impacts of OCS exploration, production, and decommissioning activities on HDDCs are discussed in detail in Section 4.4.6.2.1. Overall, impacts on HDDCs from exploration and site development activities are expected to be minimal because of the provisions in NTL 2009-G40 that protect HDDCs from oil and gas development activities. However, small and unmapped HDDCs may be completely or partially destroyed by bottom-disturbing activities. In such cases, recovery would likely be long term, although permanent loss of the affected feature is also possible.

Non-OCS activities that have the potential to adversely affect HDDCs include fishing/trawling, anchoring, and offshore marine transportation. Due to the water depths of these areas and the widely scattered nature of these habitats, such activities are unlikely to greatly affect HDDCs in the GOM. However, deepwater trawling could destroy HDDCs and recover could be long term or may not occur at all. Generally, commercially important deepwater fish species use *Lophelia* reefs as juveniles (SAFMC 1998).

As climate change has the potential to affect warm water corals, it could affect coldwater *Lophelia* reefs (Section 3.7.2.1.7). The saturation depth of aragonite (the primary carbonate formed used by hard corals) appears to be a primary determinant of deepwater coral distribution, with reefs forming in areas of high aragonite solubility (Orr et al. 2005). The depth at which the water is saturated with aragonite is projected to become shallower over the coming century, and most coldwater corals may be in undersaturated waters by 2100 (Orr et al. 2005). Consequently, the spatial extent, density, and growth of deepwater corals may decrease, diminishing their associated ecosystem functions (Orr et al. 2005). There is evidence that oil and gas extraction reduces the natural release of hydrocarbons that support deep-sea chemosynthetic communities (Quigley et al. 1999). Unlike chemosynthetic communities, *Lophelia* corals do not depend on hydrocarbon seepage to meet their metabolic requirements (Becker et al. 2009) and presumably would not be affected.

Oil spills from both OCS and non-OCS activities could affect HDDCs. Detailed discussion of the impacts of OCS accidental hydrocarbon releases can be found in Section 4.4.6.2.1. The magnitude and severity of potential effects on biota associated with topographic features from such exposure would be a function of the location, timing, duration, and size of the spill, the proximity of the spill to the features, and the timing and nature of spill containment and cleanup activities. It is assumed that most accidental oil releases would be at the surface or located sufficiently far from HDDCs that they would be unlikely to greatly affect communities associated with the topographic features.

Conclusion. Impacting factors for marine benthic and pelagic habitats include both OCS and non-OCS activities. For OCS activities, planning and permitting procedures and stipulations that promote identification and avoidance of sensitive habitats should minimize the potential for direct impacts on sensitive seafloor areas during routine OCS activities. In the GOM, stipulations that are currently in place restrict OCS activities in the immediate vicinity of seafloor areas containing important topographic features, live bottom habitat, and HDDC, and there is relatively little likelihood that cumulative OCS activities will affect overall viability of ecological resources in such areas. Non-OCS activities with a potential to impact marine benthic

and pelagic habitats in the GOM include oil and gas production in State waters, sediment dredging and disposal, sand mining, anchoring, fishing/trawling, and tankering of imported oil. Disturbances from these activities such as noise, vessel discharges, and bottom disturbance would occur in addition to similar impacts from OCS Program activities. Cumulative impacts to major topographic features, live bottom habitats and HDDC as a result of OCS and non OCS Program activities would be minor, either because impacts would occur to relatively small proportions of the available habitats or because there are various restrictions in place to limit the potential for impacts. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.6.2.1).

Oil spills could result from both OCS and non-OCS activities. The cumulative impacts of past, present, and future oil spills on seafloor habitats would be minor to major. The incremental impacts of accidental oil spills associated with the proposed action on these resources would be small to large, depending on the location, timing, duration, and size of spills; the proximity of spills to particular habitats; and the timing and nature of spill containment and cleanup activities (see Section 4.4.6.2.1). Spills in deeper water, whether from OCS or non-OCS sources, are unlikely to have overall community-level effects on seafloor habitats because of the relatively small proportion of seafloor area that would come in contact with released oil at concentrations great enough to elicit toxic effects. Catastrophic oil spills that affect shallow and intertidal habitats have the potential to be of greatest significance. Although pelagic habitat is likely to recover quickly following an oil spill, the recovery time for intertidal and shallow subtidal benthic habitat directly impacted by oil spills could be long term.

4.6.3.1.3 Essential Fish Habitat. This section identifies activities that could affect fish resources in the GOM, including non-OCS activities and current and planned OCS activities that would occur during the life of the Program, and the potential incremental effects of implementing the proposed action. Cumulative effects on EFH could occur from a variety of OCS and non-OCS activities that have a potential to directly kill managed fish species, disturb ocean bottom habitats, increase sediment suspension, degrade water quality, or affect the food supply for fishery resources.

Cumulative impacting factors for EFH include both OCS and non-OCS activities. Impacts on marine benthic and pelagic habitat resulting from ongoing and future routine OCS program activities, including those of the proposed action, could result from noise, well drilling, pipeline placement (trenching, landfalls, and construction), platform placement (anchoring, mooring, and removal, except in deep waters) and routine discharges (drilling, production, platform, and vessel). Accidental oil spills are also counted among OCS program-related activities.

Routine OCS activities could disturb bottom areas due to the installation of platforms and pipelines and the anchoring of vessels and structures. Up to 12,000 production wells and 2,000 oil platforms are anticipated to be built in the GOM under the cumulative scenario (Table 4.6.1-1). In addition, up to 69,200 km (43,000 mi) of offshore pipeline could be constructed. The construction of platforms and pipelines over the period of the Program would disturb as much as 81,000 ha (200,200 ac) in total (Table 4.6.1-1). Under the cumulative

scenario, it is anticipated that less than 40 new pipeline landfalls could occur in the GOM (Table 4.6.1-1) with up to 12 of these resulting from the proposed action. As discussed in Section 4.4.6.4, deposition of drilling muds and cuttings could potentially affect EFH by altering grain-size distributions and chemical characteristics of sediments such that benthic prey of some managed fish species would be affected in the immediate area surrounding drill sites. Produced water will also be released into the GOM during the production phase.

Platform removals using explosives will likely kill some fish, including managed species for which EFH has been established, and would remove platform-associated fouling communities that serve as prey for managed species. Up to 280 platforms may be removed under the proposed action compared with up to 1,200 platforms removed using explosives as a result of cumulative OCS activities during the life of the Program. If large numbers of fish are killed as the result of removal of platforms using explosives, there could be effects on managed species and their prey in the immediate vicinity of the removed platforms. Once a platform is removed, the fouling community that serves as a food source for some managed and prey fish species in the vicinity would no longer be available, and the associated fishes would be forced to relocate to other foraging areas. However, given the relatively small area that would be affected by such removals, Gulfwide effects on managed species are not anticipated.

See Section 4.4.6.4.1 for a detailed discussion of the impacts of routine operations on EFH and managed species in the GOM. Overall, it is expected that the cumulative impacts of exploration and site development activities on marine EFH would be moderate, and impacts are not expected to permanently reduce the EFH available to managed species or result in population-level impacts to managed species. The most sensitive benthic habitats, such as those associated with hard bottoms and topographic features, should not be affected by routine operations, and effects would be minimized or eliminated by existing lease stipulations.

There are also State oil and gas activities that can affect EFH. Louisiana and Texas have experienced substantial oil and gas development within their coastal areas including exploratory drilling, production platform installation, and pipeline installation. Factors that could affect EFH from these activities would be similar to those described above for OCS activities. However, the effects from non-OCS oil and gas activities could possibly be more severe than the effects from routine OCS activities because the activities are closer to shore and in shallower environments. As a consequence, more benthic EFH may be damaged, and resulting changes in sedimentation and turbidity could affect a greater proportion of the water column.

Other non-OCS activities that influence EFH may include commercial fishing, commercial shipping (tanker transportation), land development, water quality degradation, dredge and fill and dredge disposal operation, and construction of channel stabilization structures such as jetties could affect EFH (GMFMC 1998). As discussed below, these non-OCS activities when combined with OCS activities could result in cumulative impacts on EFH over time, especially if these impacts occur frequently or are of sufficient magnitude that habitat recovery times are prolonged.

Barges carrying cargo arrive and depart through ports and travel through the GOM Intracoastal Water Way, which serves as a major route for needed goods and supplies.

Discharges of treated wastes or hazardous chemicals could negatively affect water quality (Section 4.6.2.1.1), a component of EFH, as well as aquatic vegetation. Pollutants generated from boat maintenance activities on land and water could also negatively impact water quality. Oil and grease are commonly found in bilge water, especially in vessels with inboard engines, and these products may be discharged during vessel pump out (USEPA 1993).

Sand mining and routine dredging operations for channel construction and maintenance, pipeline emplacement, and creation of harbor and docking areas can affect EFH in the GOM by suspending sediments and affecting water quality. As suspended sediments settle to the bottom, the benthic prey of some managed fish species could be smothered. In most cases, benthic organisms would recolonize such areas unless maintenance dredging operations are repeated frequently. Dumping sites for dredge spoils in the GOM, most of which are located within State waters, could also alter water quality and affect benthic organisms that serve as prey for some managed fish species.

See individual sections on water quality, coastal habitats, and marine and pelagic habitats for a discussion of the effects of climate change on EFH in the GOM. One primary impact expected to result from climate change is the loss of wetland habitat, which is an important EFH for many larval and juvenile stages of managed species. Wetland loss could be caused by several factors including erosion, sea level rise, discharging nutrient-laden waters to the environment, reduced sediment load of the Mississippi River, and human-induced subsidence from groundwater withdrawals, among others. Cumulative effects on wetlands are discussed in Section 4.6.3.1.1.

Commercial and recreational fisheries in the GOM also impact EFH. For example, most of the wild shrimp caught are harvested using bottom trawls. The nets are held open with bottom sled devices made from wood or steel. In addition to capturing and killing some nontarget fish and invertebrate species, the sleds, or "doors," drag along the bottom, potentially digging up sediments and hard substrate. Such activities could disrupt the benthic community and increase the turbidity of the water (Jones 1992). Similarly, use of spiny lobster and stone crab traps may also damage bottom substrate such as seagrasses and corals.

Other events, including hurricanes, turbidity plumes, and hypoxia, could also affect various managed fish or their habitat, although the GOM fish community as a whole should be adapted to such events. For example, a hurricane or a series of hurricanes could temporarily degrade the quality of large areas of wetlands that serve as nursery and feeding areas for a variety of managed fish and invertebrate species.

Oil spills from OCS and non-OCS activities may cumulatively affect several resources that contribute to EFH, including sediments, water quality, fish resources, coastal habitats, and seafloor habitats and benthic communities (see Sections 4.6.2 and 4.6.3). Large, potentially catastrophic spills could result from pipeline ruptures, tanker spills associated with an FPSO system, or loss of well control. Other potential sources of oil spills that could affect EFH include non-OCS oil development activities and non-OCS tankering activities. Spills from import tankers could occur offshore in shipping lanes or in coastal waters as tankers prepare to make landfall.

Oil from shallow-water spills could impact life stages of managed fish species that use surface waters as part of their lifecycle, especially those that release pelagic eggs and have pelagic larvae. Unlike adult fish that can move away from oiled waters, pelagic eggs and larvae are largely transported by wind and water currents. Those that come into contact with surface oil could be injured or killed through smothering or an accumulation of oil on the gills. Thus, oiled surface waters would temporarily reduce the amount of EFH available for these life stages. Detailed discussion of the impacts of oil spills on fish can be found in Section 4.4.7.3.1.

In marine waters, several individual reefs and banks located offshore of the Louisiana-Texas border have been designated HAPCs by the GMFMC (NMFS 2010a). As identified in Section 4.4.6.2.1, NTL No. 2009-G39 has several protections in place to minimize and mitigate the adverse effects of oil and gas exploration and development on these banks. However, large or catastrophic spills could adversely affect hard-bottom HAPC by causing lethal or sublethal impacts to corals (Section 4.4.6.2.1). The HAPC for bluefin tuna extends from the 100 m (328 ft) isobath seaward to the EEZ. The HAPC could also be affected by oil spills, and population-level impacts to bluefin tuna could result from catastrophic spills. Habitat areas of particular concern in nearshore areas include intertidal and estuarine habitats with emergent and submerged vegetation, sand and mud flats, and shell and oyster reefs that may provide food and rearing for managed juvenile fish and shellfish. Shallow-water spills may reach these coastal EFH areas and have negative impacts. Shallow-water wave action could increase entrainment of oil and tar balls in the water column. This could temporarily diminish the quality and quantity of benthic EFH. Settled tar balls may be ingested by bottom-feeding fishes and may harm or prove fatal to them. During a spill, aquatic vegetation, which provides habitat for juveniles and for prey of some managed species, could become coated with oil. In such cases, organisms that are sessile or that have limited ability to avoid spills could be killed. These areas represent important nursery areas for fishes and invertebrates that contribute to estuarine, coastal, and shelf food webs. Loss of such habitat by oil spills would be compounded by the existing high natural loss of wetlands.

The actual locations of the spills will determine the degree to which EFH would be affected. The HAPC in the Eastern Planning Area that could be affected by oil spills from the Central or Western Planning Areas include the Florida Middle Grounds, the Madison-Swanson Marine Reserve. Pulley Ridge, and Tortugas North and South Ecological Reserve are also located in the southern tip of Florida, and are unlikely to be contacted by oil. Spills have the greatest potential to harm EFH resources if they occur in shallow waters, where benthic habitats or wetlands can be affected, or if they occur when large numbers of pelagic eggs and larvae of managed species are present. If the location of a spill coincided with the location of eggs and larvae, large numbers of these organisms would be injured or killed. Oil reaching the surface from deepwater pipeline spills and deepwater tanker spills could affect EFH for the eggs and larvae of federally managed pelagic fish species, neuston prey species, and *Sargassum* and its associated fauna. Pelagic eggs and larvae contacting the spilled oil would be smothered, and *Sargassum* within affected areas would be fouled and potentially killed.

Conclusion. Impacting factors for EFH include both OCS and non-OCS activities. Non-OCS activities with a potential to impact EFH in the GOM include oil and gas production in State waters, sediment dredging and disposal, and vessel traffic. Impacts from OCS activities

would be limited by specific lease stipulations. Cumulative impacts to EFH as a result of OCS and non-OCS program activities would be minor, due to the small proportion of EFH area that would likely be affected. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.6.3.1).

Accidental releases of oil and gas from OCS and non-OCS facilities could also have effects on EFH. The cumulative impacts of past, present, and future oil spills on EFH would be minor to moderate. The incremental impacts of accidental spills associated with the proposed action on EFH would be small to large, depending on the location, timing, duration, and size of spills; the proximity of spills to particular fish habitats; and the timing and nature of spill containment and cleanup activities (see Section 4.4.6.3.1). While most accidents related to OCS activities assumed under the cumulative spill scenario would be small and would have relatively small incremental impacts on EFH, spills that reach coastal wetlands could have more persistent impacts and could require remediation. Spills in deeper water, whether from OCS or non-OCS sources, are unlikely to have overall population-level effects on fish resources because of the relatively small proportion of similar available fish habitats that would come in contact with released oil at concentrations great enough to elicit toxic effects. Oil spills that have the greatest potential to impact EFH and managed species are those that occur in shallower subtidal and intertidal areas and spills that reach areas at the same time where substantial numbers of eggs or larvae of managed species are present.

4.6.3.2 Alaska – Cook Inlet

4.6.3.2.1 Coastal and Estuarine Habitats. A number of activities associated with the proposed action could result in impacts on coastal and estuarine habitats in the Cook Inlet Planning Area (Section 4.4.6.1.2). These activities include construction of pipelines and pipeline landfalls and operation of service vessels and existing facilities. Impacts could include losses of beach and wetland habitat and indirect effects that contribute to reductions in these habitats or impacts on biota. There are no past or ongoing OCS activities in the Cook Inlet Planning Area.

Pipeline landfalls could directly disturb tidal marshes, beaches, rocky shores, or other coastal habitats, depending on the location of the landfalls. Sedimentation from physical disturbance of substrates may affect biota in intertidal or shallow subtidal habitats. In addition, accidental spills may impact shoreline habitat.

Ongoing non-OCS activities that could affect coastal and estuarine habitats include those related to State oil and gas development, commercial shipping and other marine vessels, coastal development, discharge of municipal wastes and other effluents, domestic transportation of oil and gas, and logging. These activities can be reasonably expected to continue into the future.

Factors that impact coastal wetlands include the direct elimination of wetland habitat by excavation or filling and the degradation of wetland communities by reduced water quality or hydrologic changes. The construction of pipelines, docks, or shorebases associated with State oil and gas exploration and development could result in direct losses of habitat. Habitats and

associated biota within the Cook Inlet Planning Area could also be impacted by routine discharges from marine vessels, discharges of municipal and industrial wastewater, or sedimentation from upland areas, including erosion from logging operations within the Cook Inlet watershed. Activities that increase wave action along beaches could contribute to their erosion. Barge and service vessel traffic supporting State oil and gas development may result in wake erosion. The direct and indirect impacts on wetlands from pipeline construction, service vessel operation, and operation of existing facilities under the proposed action would represent a very small contribution to the past, ongoing, and expected future impacts on coastal and estuarine habitats from non-OCS activities.

Accidental spills of oil or other liquid hydrocarbons, resulting from activities conducted under the proposed action, could impact shoreline habitats. As under the proposed action, the majority of these spills would be small (less than 50 bbl). Spills from onshore pipelines and facilities could impact freshwater wetlands, or tidal wetlands if carried to coastal habitats by streams. Non-OCS activities, such as State oil and gas development, domestic transportation of oil or refined petroleum products, including LNG from Cook Inlet and the Alaska Peninsula, the production and storage of petroleum products and LNG, and commercial shipping, may also result in accidental spills that could potentially impact shoreline habitats. Oil spills have resulted in past impacts on beaches and other intertidal habitats, as in the case of the *Exxon Valdez* oil spill. Spills can result in short- or long-term effects on vegetation growth and changes in the composition of intertidal or shallow subtidal communities, or extensive mortality of biota associated with shoreline habitats, and may persist in substrates for decades. The amount of oil contacting shoreline habitats from a spill depends on a number of factors such as the location and size of the spill, waves and water currents, and containment actions. Naturally occurring seeps may also be a source of crude oil introduced into nearshore waters (Kvenvolden and Cooper 2003). The magnitude of resulting impacts and the persistence of oil would depend on factors such as the amount of oil deposited, remediation efforts, substrate grain size, and localized erosion and deposition patterns. Recovery of affected wetlands could require several decades. The impacts of potential spills associated with the proposed action would be expected to add a small contribution to the impacts of other sources of oil in the planning area.

Indirect effects on coastal and estuarine habitats could result from global climate change. Potential thermal expansion of ocean water and melting of glaciers and ice caps could result in a global rise in mean sea level (Section 4.6.1.6). Sea-level rise could result in increased inundation of shorelines and erosion of beach habitat and conversion of wetlands to open water. In addition, large changes in river flows into nearshore marine waters could affect salinity and water circulation in estuaries, which, in turn, could impact estuarine wetland communities.

Conclusion. Future OCS program and ongoing and future non-OCS program activities in combination with naturally occurring events have resulted in losses of coastal habitats in Cook Inlet; cumulative impacts on these resources, therefore, are considered to be moderate to major. Operations under the proposed action would result in small localized impacts, primarily due to facility construction, pipeline landfalls, channel dredging, and vessel traffic; however, the incremental contribution of routine Program activities to cumulative impacts would be small (see Section 4.4.6.2.2).

The cumulative impacts of past, present, and future oil spills on coastal and estuarine habitats would be moderate. The incremental impacts of accidental oil spills associated with the proposed action on these resources would be small to large, depending on the location, timing, duration, and size of the spill; the proximity of the spill to particular habitats; and the timing and nature of spill containment and cleanup activities (see Section 4.4.6.2.2). The majority of these spills would be small (less than 50 bbl). Large oil releases that occur in or reach shallower nearshore areas have the greatest potential to affect coastal and estuarine habitats. Most spills would be unlikely to contact and affect coastal and estuarine habitats. Large oil spills and catastrophic discharge events, however, can affect extensive areas of shoreline.

4.6.3.2.2 Marine Benthic and Pelagic Habitats. Cumulative impacting factors for marine benthic and pelagic habitats in Cook Inlet Planning Area include both OCS and non-OCS activities. Potential impacts on marine benthic and pelagic habitat resulting from ongoing and future routine OCS program activities, including those of the proposed action, could result from noise (vessel, seismic surveys, construction, operations), well drilling, pipeline placement (trenching, landfalls, and construction), platform placement (anchoring, mooring, and removal), and discharges (drilling, vessel and platform). All these activities have the potential to adversely affect marine benthic habitats in the Cook Inlet Planning Area. Accidental oil spills are also counted among OCS program-related activities; assumptions for oil spills under the cumulative case scenario are provided in Table 4.6.2-3, and catastrophic spill assumptions are provided in Table 4.4.2-2.

Because there is no OCS activity in Cook Inlet Planning Area, the new OCS activities under the proposed action represent a 100% increase in all associated OCS activities in Cook Inlet. Over the life of the Program, up to 114 production wells and up to three oil platforms are anticipated. In addition, up to 241 km (150 mi) of new offshore pipeline is anticipated. Bottom disturbance resulting from OCS program activities degrades water quality by increasing water turbidity in the vicinity of the operations and adding contaminants to the water column. It also changes sediment composition as suspended sediments (and contaminants, if present) are entrained in currents and deposited in new locations. Construction of platforms in areas previously lacking hard substrate could have localized effects on the biodiversity and distribution of benthic communities by favoring organisms that prefer a hard substrate. Impacts of OCS routine operations (exploration, production and decommissioning activities) on marine benthic and pelagic habitat in the Cook Inlet Planning Area are discussed in detail in Sections 4.4.6.2.2 and 4.4.6.3.2. Overall, routine operations represent a negligible to moderate long-term disturbance, with the severity of the impacts generally decreasing dramatically with distance from the well site.

The increased amount of drilling in Cook Inlet anticipated under the proposed action will result in OCS discharges of drill muds and cuttings from exploration and delineation wells. Drilling muds and cuttings from production wells as well as all produced waters will be disposed of in the well rather than discharged into Cook Inlet. The OCS discharges of drill muds, cuttings, and produced waters could potentially affect benthic and pelagic habitat by increasing turbidity and altering grain size distributions and chemical characteristics of sediments. The

impacts of drilling discharges on benthic and pelagic habitats are discussed in detail in Sections 4.4.6.2.3 and 4.4.6.3.3.

Various non-OCS activities in Cook Inlet, including State oil and gas programs, dredging and disposal of dredging spoils in OCS waters, anchoring, and commercial or sportfishing activities, and commercial shipping (including imported oil) could contribute to cumulative effects on pelagic and seafloor habitats. Drilling of wells in State waters could also require construction of platforms and pipelines in waters of Alaska. Effects on seafloor and pelagic habitat and biota would be similar to those described above for OCS oil and gas programs (Sections 4.4.6.2.2 and 4.4.6.3.2). Dredging operations in conjunction with ship channel maintenance and construction, pipeline placement and burial, and support facility access occur throughout the Cook Inlet Planning Area as part of non-OCS activities. Non-OCS dredging and marine disposal activities would involve excavation of nearshore sediments and subsequent disposal in offshore or nearshore areas, thereby disturbing seafloor habitats and generating temporary turbidity in the water column. Sediments dredged and sidecast or transported to approved dredged material disposal sites could cause smothering and some mortality of sessile animals in the vicinity of the activity. Anchoring of non-OCS activity vessels on these features could cause significant chronic disturbance to benthic and bottom water habitat and biota. Anchoring could involve boats used for recreational and commercial fishing and commercial ship traffic. The amount of damage that could result from anchoring activity would depend upon vessel size, the size of the anchor and chain, sea conditions at the time of anchoring, and the location or position of the anchor on the feature. Similarly, some fishing methods, such as trawling and shellfish dredging, could damage seafloor habitats and increase the turbidity of the water column (Jones 1992). The effects of dredging, anchoring, and trawling activities on marine benthic and pelagic habitats are expected to be similar to those described for OCS bottom disturbing activities (Sections 4.4.6.2.2 and 4.4.6.3.2). Impacts on pelagic habitat would be localized and temporary, while benthic habitat damaged by anchors may take more than 10 years to recover, depending upon the nature of the habitat and severity of the damage.

As a heavily river influenced system, climate change may cause the temporal variability of key chemical and physical parameters the Cook Inlet Planning Area — particularly hydrology, dissolved oxygen, salinity, and temperature. These changes could significantly alter the existing benthic and pelagic habitat and biota. A predicted increase in river discharge could change the salinity, temperature, and turbidity regimes in nearshore areas and alter the composition of existing phytoplankton and benthic communities. Other changes could result from:

- Ocean acidification from increasing CO_2 inputs into the ocean that may reduce the availability of calcite and aragonite to calcifying marine organisms.

- The expected reduction in landfast ice extent and duration resulting from rising temperatures may reduce the scouring of intertidal and shallow subtidal habitats on the western side of Cook Inlet.

- Warmer temperatures may also increase phytoplankton productivity, potentially resulting in greater food inputs to benthic habitats and subsequent increases in the productivity of benthic biota.

Oil spills from both OCS and non-OCS activities could affect benthic and pelagic habitat in Cook Inlet. The total number of oil spills and the extent of affected seafloor habitat would likely increase under the cumulative scenario, in conjunction with increased levels of petroleum exploration and production. Accidental hydrocarbon releases can occur at the surface from tankers or platforms or at the seafloor from the wellhead or pipelines. Non-OCS activities, such as oil and gas development in State waters, domestic transportation of oil or refined petroleum products, and commercial shipping, may also result in accidental spills that could affect benthic and pelagic habitats within the Cook Inlet Planning Area.

For both OCS and non-OCS oil spills, it is assumed the magnitude and severity of potential impacts on benthic and pelagic habitat would be a function of the location (including habitats affected), timing, duration, and size of the spill and containment and cleanup activities. It is anticipated that most small to medium spills would have limited effects because of the relatively small areas likely to be exposed to high concentrations of hydrocarbons and the short period of time during which potentially toxic concentrations would be present. Oil spills would likely have the greatest impacts on benthic habitat and communities in shallow subtidal waters and in intertidal areas. Although pelagic habitat is likely to recover quickly following an oil spill, the recovery time for intertidal and shallow subtidal benthic habitat directly impacted by oil spills could be long term (Section 4.4.6.2.2). Multiple spills would further contribute to cumulative effects. Detailed discussion of the impacts of OCS accidental hydrocarbon releases on marine benthic and pelagic habitat can be found in Sections 4.4.6.2.2 and 4.4.6.3.2.

Conclusion. Impacting factors for marine benthic and pelagic habitats include both OCS and non-OCS activities. Non-OCS activities in Alaskan waters, including oil and gas development in State waters, commercial fishing and sportfishing, sediment dredging and disposal, anchoring, and tankering of imported oil, could also contribute to cumulative effects on seafloor habitats. Disturbances from these activities including noise, vessel discharges, and bottom disturbance would occur in addition to similar impacts from OCS activities. Cumulative impacts to marine benthic and pelagic habitats, as a result of OCS and non-OCS program activities, would be minor, either because of the limited time frame over which most individual activities would occur or the small proportion of available habitats that would be affected during a given period. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.6.2.2).

Oil spills could result from both OCS and non-OCS activities. The cumulative impacts of past, present, and future oil spills on seafloor habitats would be moderate. The incremental impacts of accidental oil spills associated with the proposed action on these resources would be small to large, depending on the location, timing, duration, and size of spills; the proximity of spills to particular seafloor habitats; and the timing and nature of spill containment and cleanup activities (see Section 4.4.6.2.2). Oil from catastrophic spills that reach shallow and intertidal habitats have the potential to be of greatest significance. Although pelagic habitat is likely to recover quickly following an oil spill, the recovery time for intertidal and shallow subtidal benthic habitat directly impacted by oil spills could be long-term.

4.6.3.2.3 Essential Fish Habitat. This section identifies activities that could affect fish resources in Cook Inlet, including non-OCS activities and current and planned OCS activities that would occur during the life of the Program, and the potential incremental effects of implementing the proposed action. Cumulative effects on EFH could occur from a variety of OCS and non-OCS activities that have a potential to directly kill managed fish species, disturb ocean bottom habitats, increase sediment suspension, degrade water quality, or affect the food supply for fishery resources.

Cumulative impacting factors for EFH include both OCS and non-OCS activities. Impacts on marine benthic and pelagic habitat from ongoing and future routine OCS program activities, including those of the proposed action, could result from noise, well drilling, pipeline placement (trenching, landfalls, and construction), platform placement (anchoring, mooring, and removal), and routine discharges (drilling, platform, and vessel). Accidental oil spills are also counted among OCS program-related activities.

Because there is no OCS activity in Cook Inlet Planning Area, the new OCS activities under the proposed action represent a 100% increase in all associated OCS activities in Cook Inlet. Over the next Program life, up to 114 production wells and up to three oil platforms are anticipated. In addition, up to 241 km (150 mi) of new offshore pipeline are anticipated. Implementation of the proposed action would also result in seismic survey activity and the release of drilling muds and cuttings to offshore areas (Table 4.6.2-2).

Although there are is no oil and gas development in OCS waters, oil and gas operations have existed in State waters of Cook Inlet for decades. Impacting factors from OCS and non-OCS oil and gas activities would be similar. Overall, it is expected that the cumulative impacts of exploration and site development activities on marine EFH would be moderate, and impacts are not expected to permanently reduce the EFH available to managed species or result in population-level impacts on managed species. The most sensitive benthic habitats, such as those associated with hard-bottoms and kelp communities, should not be affected by routine operations, and effects would be minimized or eliminated by existing protections. The construction of all platforms and pipelines would disturb bottom habitats to some degree. Deposition of drilling fluids and cuttings could potentially affect EFH by altering grain size distributions and chemical characteristics of sediments such that benthic prey of some managed fish species or water quality in offshore areas would be affected in the immediate area surrounding drill sites. Although muds and cuttings from exploration and delineation wells could be discharged to surrounding waters, it is assumed that muds, cuttings, and produced waters from production wells would be discharged into wells and not released to open waters. See Section 4.4.6.4.2 for a detailed discussion of the impacts of routine operations on EFH and managed species in Cook Inlet Planning Area.

Freshwater areas used by salmon and other anadromous fish are considered to be EFH and could be affected by nearshore OCS and non-OCS oil and gas activity such as pipeline dredging or by onshore pipelines that cross bodies of water, especially streams. The primary effects of pipeline crossings would be increasing turbidity and sedimentation of the benthic environment during construction and blocking migration of anadromous fish following construction. As a consequence, crossings of anadromous fish streams would be minimized and

consolidated with other utility and road crossings of such streams. In addition, onshore pipelines would be designed, constructed, and maintained to reduce risks to fish habitats from a spill, pipeline break, or construction activities. Other non-OCS activities, such as logging, road construction, and development in general could also contribute to water quality degradation and blockage of fish passage in anadromous fish streams.

Other non-OCS activities that could impact fish communities include land use practices, point and non-point source pollution, logging, dredging/ and disposal of dredging spoils in OCS waters, anchoring, and commercial or sportfishing activities, and commercial shipping (including imported oil). Many of these activities would result in bottom disturbance that would affect bottom dwelling fishes as well as their food sources in a manner similar to those described for OCS activities (Section 4.4.7.3.2). These non-OCS activities when combined with OCS activities could over time result in cumulative impacts on EFH and managed species especially if these impacts occur frequently or are of sufficient magnitude that habitat recovery times are prolonged. See Section 4.6.3.2.1 and Section 4.6.3.2.2 for a discussion of impacts of these non-OCS activities on benthic and pelagic EFH.

Logging could also degrade riverine habitats that are important reproductive and juvenile habitat for managed migratory fish species. Erosion from areas undergoing commercial logging could increase the silt load in streams and rivers, which could reduce levels of invertebrate prey species and adversely affect spawning success and egg survival. The introduction of fine sediments into spawning gravels may render these habitats unsuitable for salmon spawning. Logging could also remove riparian canopies along some streams, which could increase solar heating of freshwater habitats. Downed timber could physically block salmon migrations. Because of past damage inflicted by commercial logging, improved forestry practices have been initiated, and timber harvests have been curtailed. Continued implementation of effective forest management techniques should help mitigate the adverse effects of logging in the future. Cumulative impacts on migratory species could also occur as a result of activities that obstruct fish movement in marine environments during migration periods.

Commercial fishing practices that are indiscriminate, such as trawling and pots, are responsible for significant amounts of bycatch that can injure or kill juveniles of many fish species. These types of fishing practices could damage future year classes, reduce available prey species, and damage benthic habitat for many Cook Inlet fish resources. A wide variety of methods are used to target numerous species of fishes and shellfishes, including longlines, seines, setnets, trawls, and traps. Some fisheries target particular fish species returning to their natal stream or river, while other fisheries take place in pelagic waters and target mixed stocks of fishes or shellfishes.

As a consequence of the pressure commercial fishing places on fishery resources, appropriate management is required to reduce the potential for depletion of stocks due to overharvesting. Fisheries in Alaskan waters and in adjacent offshore areas are managed by the Alaska Department of Fish and Game and the North Pacific Fishery Management Council of the National Marine Fisheries Service through implementation of fishing regulations such as fishing seasons and harvest limits and through hatchery production of some fishery resources (primarily salmon). Even with management, the possibility of overfishing still exists. Occasionally

fisheries are closed when stocks are considered insufficient to support harvesting, and will sometimes remain closed for multiple seasons before stocks are deemed sufficient. While occasional or sustained declines in fishery stocks may not be fully attributable to commercial fishing, it appears that commercial fishing is an important factor in the abundance, or lack thereof, of fishery resources.

Although the magnitude of harvests is considerably smaller than for commercial fisheries (Fall et al. 2009), sportfishing also contributes to cumulative effects on the abundance of some fishery resources. Recreational fisheries are managed to prevent overharvesting, but recreational harvests can be a substantial portion of fisheries landings. Consequently, recreational fishing activities have a potential to result in overharvest of managed species over the life of the Program. However, recreational fishing methods are less destructive of EFH compared to commercial fisheries.

Subsistence fishing may also contribute to the cumulative effects on the abundance of some fishery resources. Alaska State law defines subsistence as the "noncommercial customary and traditional uses" of fish and wildlife. The Alaska Department of Fish and Game defines subsistence fishing to include "the taking of, fishing for, or possession of fish, shellfish, or other fisheries resources by a resident of the State for subsistence uses with gill net, seine, fish wheel, long line, or other means defined by the Board of Fisheries." These fishing methods have more limited impacts on EFH compared to commercial fishing methods. Subsistence fishing is subject to harvest limits that reduce the potential for overfishing and much of Cook Inlet is defined as a nonsubsistence area, and subsistence fishing is therefore not authorized. Consequently, subsistence fishing makes a relatively minor contribution to the reduction in fish stocks compared to commercial fishing (Fall et al. 2009).

Another source of cumulative impacts to fishery resources are personal use fisheries which are a legally defined as "the taking, fishing for, or possession of finfish, shellfish, or other fishery resources, by Alaska residents for personal use and not for sale or barter, with gill or dip net, seine, fish wheel, long line, or other means defined by the Board of Fisheries." In the Cook Inlet Planning Area, there are areas designated for personal use fisheries for salmon, tanner crab, herring, and eulachon, all of which are managed species. All personal use fisheries are subject to harvest limits that reduce the potential for overfishing. Personal use fishing makes a relatively minor contribution to the reduction in fish stocks compared to commercial fishing.

See individual sections on water quality, coastal habitats, and marine and pelagic habitats for a discussion of the effects of climate change on EFH in the Cook Inlet Planning Area. As a heavily river-influenced system, climate change may cause the temporal variability of key chemical and physical parameters, which could significantly alter the existing benthic and pelagic habitat and biota. A predicted increase in river discharge could change the salinity, temperature, and turbidity regimes in nearshore areas and alter the composition of existing phytoplankton and benthic communities. Other changes could result from ocean acidification, reduction in landfast ice extent and duration, and increase phytoplankton productivity.

The total number of oil spills and the extent of affected EFH areas would likely increase under the proposed action in conjunction with increased levels of petroleum exploration and

production. The proposed action would contribute 100% of the OCS spills in the Cook Inlet Planning Areas. See Table 4.6.2-3 for oil spill assumptions for Alaska. Catastrophic spills assumptions are provided in Table 4.4.2-2. Non-OCS activities, such as oil and gas development in State waters, domestic transportation of oil or refined petroleum products, and commercial shipping, may also result in accidental spills that could potentially impact fish resources within the Cook Inlet Planning Area. While effects on EFH resources would depend on the timing, location, and magnitude of specific oil spills, it is anticipated that most small to medium spills that occur in OCS waters would have limited effects on EFH, due to the relatively small areas likely to be exposed to high concentrations of hydrocarbons and the short period of time during which potentially toxic concentrations would be present. See Section 4.4.6.4 for a detailed discussion of the impact of oil spills on EFH.

Because of the high concentrations of individuals likely to be present, EFH for anadromous salmon are at higher risk from an OCS oil spill in the Cook Inlet Planning Areas. The greatest potential for damage to salmon stocks would be if a spill were to occur along migration routes. However, because of the limited area affected by even large oil spills relative to the wide pelagic distribution and migratory patterns of salmonids, it is anticipated that most impacts would be limited to small fractions of exposed salmon populations. Oil spills occurring at constrictions in migration routes would have an increased potential for adversely affecting salmon. Adverse effects of oil spills on EFH for groundfishes of southern Alaska would also be a function of spill magnitude, location, and timing. Adult groundfishes are primarily demersal and would generally be subjected only to the insoluble oil and water-soluble fractions of oil that reach deeper strata. Insoluble oil fractions would sink to the bottom and be distributed diffusely as tar balls over a wide area, and would be unlikely to produce a reduction in the population of adult fishes. Egg and larval stages would be at greater risk of exposure to oil spills because spawning aggregations of many groundfish species (e.g., walleye pollock) produce pelagic eggs that could come into contact with surface oil slicks. Herring are also potentially susceptible to oil spills because they spawn in nearshore waters for protracted periods of time.

Managed shellfish stocks (such as tanner, snow, and red king crab) are unlikely to be exposed to surface oil. However, oil reaching shallow subtidal and intertidal shellfish or crab habitat could measurably reduce crab populations. Pelagic crab larvae could also be affected if a large surface oil spill occurred during the spring spawning season. However, because the area affected by most spills would be expected to be small relative to overall distributions of crab larvae, overall population levels are unlikely to be noticeably affected.

Conclusion. Impacting factors for EFH include both OCS and non-OCS activities. Non-OCS activities with a potential to impact EFH in the Cook Inlet Planning Area include oil and gas production in State waters, coastline development, commercial and recreational fishing, sediment dredging and disposal, and vessel traffic. Impacts from OCS activities would be limited by specific lease stipulations. Cumulative impacts to EFH as a result of OCS and non-OCS program activities would be minor to moderate, proportional to the EFH area affected. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.6.3.2).

Accidental releases of oil and gas from OCS and non-OCS facilities could also have effects on EFH. The cumulative impacts of past, present, and future oil spills on EFH would be minor to moderate. The incremental impacts of accidental spills associated with the proposed action on EFH would be small to large, depending on the location, timing, duration, and size of spills; the proximity of spills to particular fish habitats; and the timing and nature of spill containment and cleanup activities (see Section 4.4.6.3.2). While most accidents related to OCS activities assumed under the cumulative spill scenario would be small and would have relatively small incremental impacts on EFH, oil that reaches coastal wetlands could have more persistent impacts and could require remediation. Spills in deeper water, whether from OCS or non-OCS sources, are unlikely to have overall population-level effects on fish resources because of the relatively small proportion of similar available fish habitats that would come in contact with released oil at concentrations great enough to elicit toxic effects. Oil spills that have the greatest potential to impact EFH and managed species are those that occur in shallower subtidal and intertidal areas and spills that reach areas at the same time substantial numbers of eggs or larvae of managed species are present.

4.6.3.3 Alaska Region – Arctic

4.6.3.3.1 Coastal and Estuarine Habitats.

Coastal Barrier Beach and Dunes. Vessel traffic associated with the proposed action could result in indirect impacts on coastal barrier beaches and dunes in the Arctic region (Section 4.4.6.1.3). Onshore pipeline construction may impact sand beaches and dunes on the margins of lakes and rivers on the Arctic Coastal Plain (ACP). Similar activities are associated with current and planned OCS sales in the Alaska region and would occur during the life of the Program (see Table 4.6.1-2). In the Beaufort and Chukchi Sea Planning Areas, vessel traffic associated with the proposed action would represent approximately 25–35% of such OCS activities, and onshore pipelines associated with the proposed action would represent approximately 30% for the Beaufort Sea Planning Area.

Impacts on barrier beaches and dunes primarily result from factors that contribute to increased erosion of beaches and dunes. Activities may disturb dune vegetation, thereby promoting dune erosion, or directly disturb beach and dune substrates, resulting in increased erosion of beaches and dunes. Increases in wave action could also contribute to the erosion of beaches. Sedimentation from physical disturbance of substrates or erosion may affect biota in intertidal or shallow subtidal habitats. In addition, accidental spills may impact beach or dune habitat.

Ongoing non-OCS activities that could affect barrier beaches and dunes include those related to State oil and gas development, commercial shipping and other marine vessels, and coastal development. These activities can be reasonably expected to continue into the future.

The construction of pipelines, docks, causeways, or shorebases associated with State oil and gas exploration and development could result in direct losses of beach or dune habitat.

Construction of facilities on barrier islands could impact beach, dune, or tundra habitat. Erosion of beach or dune substrates adjacent to these constructions may result in additional habitat losses. Intertidal and shallow subtidal organisms in nearby areas may be buried by excavated materials or indirectly impacted by turbidity and sedimentation. Sand beaches and dunes along lagoon shorelines and on the margins of lakes and rivers on the ACP may also be impacted by pipeline construction. The impacts on barrier beaches and dunes from substrate-disturbance activities associated with construction under the proposed action would represent a small contribution to the past, ongoing, and expected future impacts on barrier beaches and dunes from non-OCS activities. Vegetated dunes in the Arctic region may be impacted by vehicles associated with seismic activities (ADNR 2009). Beaches and associated biota within the Beaufort and Chukchi Sea Planning Areas could also be impacted by routine discharges from marine vessels, discharges of municipal and industrial wastewater, or sedimentation from upland areas.

Activities that increase wave action along barrier beaches and dunes could contribute to their erosion. Barge and service vessel traffic supporting State oil and gas development may result in wake erosion along barrier islands in the Beaufort and Chukchi Sea Planning Areas. A portion of the impacts related to vessel traffic would be associated with the proposed action; however, activities conducted under the proposed action would contribute a relatively small number of vessel trips to the total.

Accidental spills of oil or other liquid hydrocarbons, resulting from activities conducted under the proposed action, could impact beaches and dunes. Such spills would represent approximately 20–40% of the spills resulting from ongoing OCS activities and planned future sales in the Beaufort and Chukchi Sea Planning Areas (Table 4.6.1-3). As under the proposed action, the majority of these spills would be small (less than 50 bbl). Non-OCS activities, such as State oil and gas development, domestic transportation of oil or refined petroleum products, and commercial shipping, may also result in accidental spills that could potentially impact coastal barrier beaches and dunes. Spills can result in short- or long-term changes in the composition of intertidal or shallow subtidal communities, or extensive mortality of biota associated with coastal habitats, and may persist in substrates for decades. The amount of oil contacting beaches from a spill depends on a number of factors such as the location and size of the spill, waves and water currents, and containment actions. Naturally occurring seeps may also be a source of crude oil introduced into nearshore waters (Kvenvolden and Cooper 2003). The magnitude of resulting impacts and the persistence of oil would depend on factors such as the amount of oil deposited, remediation efforts, substrate grain size, and localized erosion and deposition patterns. The impacts of potential spills associated with the proposed action would be expected to add a small contribution to the impacts of other sources of beach degradation in the Arctic region.

Indirect effects on coastal barrier beaches and dunes could result from global climate change. Potential thermal expansion of ocean water and melting of glaciers and ice caps could result in a global rise in mean sea level (Section 4.6.1.6). Sea-level rise could result in increased inundation of barrier landforms and erosion of beach habitat. In the Arctic, greater wave activity during storms due to decreases in sea-ice cover, as well as changes in permafrost due to temperature increases, could result in increased coastal erosion.

Wetlands. A number of activities associated with the proposed action could result in impacts on coastal wetlands in the Alaska region (Section 4.4.6.1.3). These activities include construction of pipelines, road construction, and facility maintenance, and activities that result in poorer water and air quality and altered hydrology. Impacts associated with these activities could include elimination of wetland habitat and indirect effects that contribute to reductions in wetland habitat. Similar activities are associated with current and planned OCS lease sales in the Beaufort and Chukchi Sea Planning Areas, and would occur during the life of the Program (see Table 4.6.1-2). In the Beaufort Sea Planning Area, the activities associated with the proposed action would represent approximately 30% of such OCS activities; the proposed action does not include new onshore pipelines in the Chukchi Sea Planning Area.

Factors that impact coastal wetlands include the direct elimination of wetland habitat by excavation or filling and the degradation of wetland communities by reduced water or air quality or hydrologic changes. Construction projects may fill wetlands for facility siting or excavate wetlands for the construction of pipelines, causeways, or shore bases or for gravel mining. A number of activities may degrade wetlands or promote wetland losses indirectly by causing changes to wetland hydrology or introducing contaminants.

Ongoing non-OCS activities that could affect coastal wetlands include those related to State oil and gas development, commercial shipping and other marine transportation, coastal development, discharge of municipal wastes and other effluents, and domestic transportation of oil and gas. These activities can reasonably be expected to continue into the future.

A number of these activities result in the localized destruction of wetlands. The construction of pipeline landfalls, docks, or shorebases associated with State oil and gas exploration and development could result in direct losses of tidal wetlands. The construction of onshore facilities to support State oil and gas development and the exploration of oil reserves on the National Petroleum Reserve-Alaska on the ACP have impacted freshwater wetlands, and future impacts associated with oil and gas development are expected to continue. The construction of buried pipelines results in direct impacts on wetlands due to excavation, and the construction of gravel pads and gravel roads eliminates wetland habitat by filling. Current technology allows for smaller and fewer drilling pads, and some new developments in the Arctic region would not include interconnecting roads. On the ACP, gravel has been used in support of oil development to construct pads for camps, drilling sites, operations and maintenance facilities, airports, and roads for facility access as well as the Dalton Highway/haul road, offshore islands, and causeways (MMS 2003a). Gravel mining operations often result in the excavation of wetland habitat in and near rivers and other water bodies. Over 730 ha (1,800 ac) of tundra have been removed by gravel mining on the ACP (MMS 2003a). The construction of vertical support members for elevated pipelines also contributes to small localized wetland losses. Although activities that impact wetlands are regulated by State and Federal agencies, construction of industrial facilities, commercial sites, and residential developments would be expected to result in continued wetland losses. On the ACP, over 3,900 ha (9,600 ac) of tundra habitat, most of which is wetland, have been impacted by oil development activities (MMS 2002b, 2003a). The direct impacts on coastal wetlands from pipeline construction under the proposed action would represent a very small contribution to the past, ongoing, and expected future losses of wetlands from non-OCS activities.

Indirect impacts of many activities have also resulted in wetland losses. The construction of gravel roads and pads has resulted in altered hydrology in some areas, by blocking natural drainage patterns, converting vegetated wetlands to open water, or drying wetlands by restricting water inflow. Snow accumulations adjacent to pads and roads can result in vegetation changes and thermokarst. Windblown dust near gravel pads and roads causes changes in plant communities, reduction of vegetation, and thermokarst, leading to wetland losses. Sedimentation from gravel pads, roads, gravel mining operations, and vehicular impacts on streambanks adversely affect wetlands and may result in losses of vegetation or other associated biota. Ice roads in the Arctic could result in compression of vegetation, microtopography, and tundra soils, altering wetland communities. Vehicles used for seismic surveys could compress microtopography and cause changes in the vegetation community. Organisms in wetland areas near construction activities may be buried by excavated materials or indirectly impacted by turbidity and sedimentation. Degradation of wetlands could result from water quality impacts due to discharges of waste water from vessels, municipal treatment plants, and industrial facilities, and stormwater discharges. Water quality may also be impacted by waste storage and disposal sites. Spills of produced water could kill vegetation and other biota in freshwater wetlands. Impacts on air quality near construction sites or industrial facilities could result in local effects on wetland vegetation, and may include sources such as fugitive dust, off-gassing from processing facilities, or exhaust emissions. Indirect impacts on wetlands from non-OCS activities are expected to continue to contribute to wetland degradation and losses in the Arctic region. The indirect impacts on wetlands from pipeline construction under the proposed action would represent a very small contribution to the past, ongoing, and expected future impacts on wetlands from non-OCS activities.

Accidental spills of oil or petroleum products as a result of activities conducted under the proposed action could impact tidal or freshwater wetlands (see Section 4.4.6.1.3). Such spills would represent approximately 20–40% of the spills resulting from ongoing OCS activities and planned future sales in the Beaufort and Chukchi Sea Planning Areas (Table 4.6.1-3). Most of these spills (1,350–1,950) would be small (less than 50 bbl), as under the proposed action. Spills in shallow water, primarily those from vessel accidents and pipelines, would be most likely to affect coastal wetlands, whereas deepwater spills, such as those from platforms, would be less likely to impact wetlands. Spills from onshore pipelines and facilities could impact freshwater wetlands or tidal wetlands if carried to coastal habitats by streams. Non-OCS activities such as State oil and gas development, the domestic transportation of oil or refined petroleum products, the production and storage of petroleum products, and commercial shipping may also result in accidental spills that could potentially impact wetlands. Naturally occurring seeps may also be a source of crude oil that could potentially affect coastal wetlands. The amount of oil contacting wetlands, the magnitude of resulting impacts, and the length of time for recovery would depend on a number of factors such as the location and size of the spill, containment actions, waves and water currents, type of oil, types of remediation efforts, amount of oil deposition, duration of exposure, season, substrate type, and extent of substrate penetration. Impacts from oil spills would be expected to range from short-term effects on vegetation growth to extensive mortality. Recovery of affected wetlands could require several decades. The impacts of potential oil spills associated with the proposed action would be expected to constitute a small addition to the impacts of all other sources of oil in the Arctic region.

Global climate change could result in indirect effects on coastal wetlands. Potential thermal expansion of ocean water and melting of glaciers could result in a global rise in mean sea level (Section 4.6.1.6). Sea-level rise would result in greater inundation of coastal wetlands, and likely result in conversion of wetlands to open water. In addition, large changes in river flows into nearshore marine waters could affect salinity and water circulation in estuaries, which, in turn, could impact estuarine wetland communities.

Conclusion. Future OCS program and ongoing and future non-OCS program activities in combination with naturally occurring events have resulted in losses of coastal habitats in the Arctic region; cumulative impacts on these resources, therefore, are considered to be moderate to major. Operations under the proposed action would result in small localized impacts, primarily due to facility construction, pipeline landfalls, channel dredging, and vessel traffic; however, the incremental contribution of routine Program activities to cumulative impacts would be small (see Section 4.4.6.1.3).

The cumulative impacts of past, present, and future oil spills on coastal and estuarine habitats would be moderate. The incremental impacts of accidental oil spills associated with the proposed action on these resources would be small to large, depending on the location, timing, duration, and size of the spill; the proximity of the spill to particular habitats; and the timing and nature of spill containment and cleanup activities (see Section 4.4.6.1.3). The majority of these spills would be small (less than 50 bbl). Large oil releases that occur in or reach shallower nearshore areas have the greatest potential to affect coastal and estuarine habitats. Most spills would be unlikely to contact and affect coastal and estuarine habitats. Large oil spills and catastrophic discharge events, however, can affect extensive areas of shoreline.

4.6.3.3.2 Marine Benthic and Pelagic Habitats. Cumulative impacting factors for marine benthic and pelagic habitats in Beaufort and Chukchi Sea Planning Areas include both OCS and non-OCS activities. Potential impacts on marine benthic and pelagic habitat resulting from ongoing and future routine OCS program activities, including those of the proposed action, could result from noise (vessel, seismic surveys, construction, operations), well drilling, pipeline placement (trenching, landfalls, and construction), discharges (drilling, vessel and platform), and platform placement (anchoring, mooring, and removal). All these activities have the potential to adversely affect marine benthic and pelagic habitats in the Beaufort and Chukchi Sea Planning Areas. Accidental oil spills are also counted among OCS program-related activities; assumptions for oil spills under the cumulative case scenario are provided in Table 4.6.2-3, and catastrophic spill assumptions are provided in Table 4.4.2-2.

Potential environmental impacts associated with the building and operation of OCS facilities such as platforms, subsea wells, artificial islands, and pipelines would increase in conjunction with the increased number of wells (approximately 9 ha [22 ac] for artificial islands versus less than 1.5 ha [3.7 ac] for platforms) and complete burial of existing substrates during construction. Under the cumulative scenario, it is anticipated that up to 1,795 production wells, up to 32 oil platforms, and up to 2,900 km (1,820 mi) of new offshore pipeline would be constructed in the Beaufort and Chukchi Sea Planning Areas. Bottom substrates would be significantly altered by the construction of artificial islands. Marine benthic and pelagic habitats

would be affected by bottom disturbance, by temporary increases in turbidity, and by deposition of disturbed sediment. Construction of artificial islands would result in a more complete loss of benthic habitat, due to larger footprints. Bottom disturbance degrades water quality by increasing water turbidity in the vicinity of the operations and adding contaminants to the water column. It also changes sediment composition as suspended sediments (and contaminants, if present) are entrained in currents and deposited in new locations. Construction of platforms and artificial islands in areas previously lacking hard substrate could have localized effects on the biodiversity and distribution of benthic communities by favoring organisms that prefer a hard substrate. Impacts of OCS routine operations (exploration, production and decommissioning activities) on marine benthic and pelagic habitat in the Beaufort and Chukchi Sea Planning Areas are discussed in detail in Sections 4.4.6.2.3 and 4.4.6.3.3. Regulations and mitigating measures should preclude construction of platforms or artificial islands and placements of pipelines or wells in environmentally sensitive areas, such as the Stefansson Sound Boulder Patch in the Beaufort Sea (Section 4.4.6.2.3). Overall, routine operations represent a negligible to moderate long-term disturbance, with the severity of the impacts generally decreasing dramatically with distance from the well site.

The increased amount of drilling anticipated under the proposed action will result in OCS discharges of drill muds and cuttings from exploration and delineation wells. Deposition of drilling fluids and cuttings could potentially affect benthic and pelagic habitat by increasing turbidity and altering grain size distributions and chemical characteristics of sediments. The impacts of drilling discharges on benthic and pelagic habitats are discussed in detail in Sections 4.4.6.2.3 and 4.4.6.3.3.

Various non-OCS activities, including oil and gas activities in State waters, commercial shipping (including tanker vessels), dredging and disposal of dredging spoils in OCS waters, and anchoring could contribute to cumulative effects on pelagic and seafloor habitats in the Beaufort and Chukchi Sea Planning Areas. Drilling of wells and oil and gas activities in State waters could also require construction of artificial islands, platforms, and pipelines in waters of Alaska. Effects on seafloor and pelagic habitat and biota would be similar to those described above for OCS oil and gas programs (Sections 4.4.6.2.3 and 4.4.6.3.3). Dredging operations in conjunction with ship channel maintenance and construction, pipeline placement and burial, and support facility access occur throughout the Beaufort and Chukchi Sea Planning Areas as part of non-OCS activities. Dredging and marine disposal activities would involve excavation of nearshore sediments and subsequent disposal in offshore or nearshore areas and could cause temporary turbidity in the water column and smothering of sessile animals in the vicinity of the activity. Anchoring of non-OCS activity vessels on these features could cause significant chronic disturbance to benthic and bottom water habitat and biota. The amount of damage that could result from anchoring activity would depend upon vessel size, the size of the anchor and chain, sea conditions at the time of anchoring, and the location or position of the anchor on the feature. The effects of dredging, anchoring, and trawling activities on marine benthic and pelagic habitats are expected to be similar to those described for the installation of pipelines (Sections 4.4.6.2.2 and 4.4.6.3.2). Impacts on pelagic habitat would be localized and temporary, with recovery time depending upon the nature of the habitat and severity of the damage.

Climate change is expected to have multiple effects on the Beaufort and Chukchi Sea Planning Areas that could impact benthic and pelagic habitat. Increased river discharge could alter the salinity, temperature, and turbidity regimes in nearshore areas (Hopcroft et al. 2008). Several rivers flow into the Beaufort shelf, and this region may be more heavily affected than the western Chukchi shelf. The increase in total suspended solids due to coastal erosion and the greater riverine sediment loading could increase turbidity in the water column and consequently decrease the penetration of photosynthetically active radiation available for kelp production (Hopcroft et al. 2008).

Climate change is expected to decrease the spatial extent and temporal duration of sea ice and make the ice thinner. Several possible consequences could result, including:

- Reduction in the spatial and temporal extent of subtidal and intertidal benthic scouring, but an increase in wave generated subtidal and intertidal disturbance;
- An increase in the sloughing of sediments from shoreline during storms, adding to the sediment loads and changing water chemistry in nearshore areas;
- An overall increase in biological productivity in the open water with increasing temperature and ice retreat and a shift to a pelagic-based rather than a benthic-based food web (Hopcroft et al. 2008); and
- Reduction in the amount and seasonal availability of sea ice algae.

In addition, ocean acidification from increasing CO_2 inputs into the ocean is also predicted to continue in arctic waters, which may reduce the availability of calcite and aragonite to calcifying marine organisms in the sediment and water column.

Oil spills from both OCS and non-OCS activities could affect benthic and pelagic habitat in the Beaufort and Chukchi Sea Planning Areas. The total number of oil spills and the extent of affected seafloor habitat would likely increase under the cumulative scenario, in conjunction with increased levels of petroleum exploration and production. Accidental hydrocarbon releases can occur at the surface from tankers or platforms or at the seafloor from the wellhead or pipelines. The total number of oil spills and the extent of affected seafloor habitat would likely increase under the cumulative scenario, in conjunction with increased levels of petroleum exploration and production. Non-OCS activities, such as oil and gas development in State waters and domestic transportation of oil, may also result in accidental spills that could affect benthic and pelagic habitats within the Beaufort and Chukchi Sea Planning Areas.

For both OCS and non-OCS oil spills, it is assumed the magnitude and severity of potential impacts on benthic and pelagic habitat would be a function of the location (including habitats affected), timing, duration, and size of the spill and containment and cleanup activities. It is anticipated that most small to medium spills would have limited effects because of the relatively small areas likely to be exposed to high concentrations of hydrocarbons and the short period of time during which potentially toxic concentrations would be present. Oil spills would

likely have the greatest impacts on benthic habitat and communities in shallow subtidal waters and in intertidal areas. Although pelagic habitat is likely to recover quickly following an oil spill, the recovery time for intertidal and shallow subtidal benthic habitat directly impacted by oil spills could be long term. If a large amount of oil from a spill were to sink and inundate sensitive boulder communities, the recovery of sensitive species could be long term (Section 4.4.6.2.3). Detailed discussion of the impacts of accidental hydrocarbon releases on marine benthic and pelagic habitat potentially resulting from the Program in the Beaufort and Chukchi Sea Planning Areas can be found in Sections 4.4.6.2.3 and 4.4.6.3.3.

Conclusion. Impacting factors for marine benthic and pelagic habitats include both OCS and non-OCS activities. Non-OCS activities with a potential to impact marine benthic and pelagic habitats in the Beaufort and Chukchi Sea Planning Areas include oil and gas production in State waters, sediment dredging and disposal, and vessel traffic. Disturbances from these activities including noise, vessel discharges, and bottom disturbance would occur in addition to similar impacts from OCS activities. For OCS activities, planning and permitting procedures should minimize the potential for direct impacts on sensitive boulder habitats during routine OCS activities. Cumulative impacts to marine benthic and pelagic habitats as a result of OCS and non-OCS program activities would be minor, either because of the limited time frame over which most individual activities would occur or the small proportion of available habitats that would be affected during a given period. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.6.2.3).

Oil spills could result from both OCS and non-OCS activities. The cumulative impacts of past, present, and future oil spills on seafloor habitats would be moderate. The incremental impacts of accidental oil spills associated with the proposed action on these resources would be small to large, depending on the location, timing, duration, and size of spills; the proximity of spills to particular seafloor habitats; and the timing and nature of spill containment and cleanup activities (see Section 4.4.6.2.3). Spills in deeper water, whether from OCS or non-OCS sources, are unlikely to have overall community-level effects on seafloor habitats because of the relatively small proportion of seafloor area that would come in contact with released oil at concentrations great enough to elicit toxic effects. Catastrophic oil releases that affect shallow and intertidal habitats have the potential to be of greatest significance. Although pelagic habitat is likely to recover quickly following an oil spill, the recovery time for intertidal and shallow subtidal benthic habitat directly impacted by oil spills could be long-term.

4.6.3.3.3 Essential Fish Habitat. This section identifies activities that could affect EFH resources in the Beaufort and Chukchi Sea Planning Areas, including non-OCS activities and current and planned OCS activities that would occur during the life of the Program, and the potential incremental effects of implementing the proposed action. Cumulative effects on EFH could occur from a variety of OCS and non-OCS activities that have a potential to directly kill managed fish species, disturb ocean bottom habitats, increase sediment suspension, degrade water quality, or affect the food supply for fishery resources.

Cumulative impacting factors for EFH include both OCS and non-OCS activities. Impacts on marine benthic and pelagic habitat resulting from ongoing and future routine OCS

program activities, including those of the proposed action, could result from noise, well drilling, pipeline placement (trenching, landfalls, and construction), subsea production well and platform placement (anchoring, mooring, and removal), and routine discharges (drilling, platform, and vessel). Accidental oil spills are also counted among OCS program-related activities.

Under the cumulative scenario it is anticipated that up to 1,795 production wells, up to 32 oil platforms, and up to 2,900 km (1,820 mi) of new offshore pipeline would be constructed in the Beaufort and Chukchi Sea Planning Areas over the period of the Program. Drilling muds and cuttings from exploration wells would also be released in to OCS waters.

Overall, it is expected that the impacts of exploration and site development activities on marine EFH would be moderate, and impacts are not expected to permanently reduce the EFH available to managed species or result in population-level impacts on managed species. The most sensitive benthic habitats, such as those associated with hard-bottoms and kelp communities, should not be affected by routine operations since impacts would be minimized or eliminated by existing protections. Although construction of platforms, artificial islands, and pipelines would all disturb bottom habitats to some degree, artificial islands (Beaufort and Chukchi Seas only) would result in a more complete loss of benthic habitat due to larger footprints (approximately 9 ha [22 ac] for artificial islands versus less than 1.5 ha [3.7 ac] for platforms) and complete burial of existing substrate. Deposition of drilling muds and cuttings could potentially affect EFH by altering sediment characteristics such that benthic prey of some managed fish species, certain stages of the managed species themselves, or water quality in offshore areas would be affected in the immediate area surrounding drill sites. See Section 4.4.6.4.3 for a detailed discussion of the impacts of routine operations on EFH and managed species in the Arctic.

Various non-OCS activities, such as subsistence fishing, commercial shipping (including tankers), coastal modifications, hardrock mining, dredging and disposal of dredging spoils in OCS waters, and anchoring could contribute to cumulative effects on pelagic and seafloor EFH in the Beaufort and Chukchi Sea Planning Areas. Commercial fishing does not occur in the Beaufort and Chukchi Sea Planning Areas and sportfishing is minor in the Arctic but could increase if regulations change and if warming temperatures allow an increase in vessel traffic. Impacts from these non-OCS activities including noise, vessel discharges, and bottom disturbance would occur in addition to similar impacts from OCS activities. Many of these activities would result in bottom disturbance that would affect bottom dwelling fishes as well as their food sources in a manner similar to those described for OCS activities (MMS 2008; ADEC 2007a; Section 4.4.7.3.3).

EFH and managed species in the Beaufort and Chukchi Sea fall in the Kotzebue Sound and Northern Subsistence fishing areas (http://www.adfg.alaska.gov/index.cfm?adfg= subsistence.main). Subsistence fishing may contribute to the cumulative effects on the abundance of some fishery resources. Alaska State law defines subsistence as the "noncommercial customary and traditional uses" of fish and wildlife. The Alaska Department of Fish and Game defines subsistence fishing to include "the taking of, fishing for, or possession of fish, shellfish, or other fisheries resources by a resident of the State for subsistence uses with gill net, seine, fish wheel, long line, or other means defined by the Board of Fisheries." These

fishing methods have more limited impacts on EFH compared to commercial fishing methods. In addition, subsistence fishing is subject to harvest limits that reduce the potential for overfishing. Consequently, subsistence fishing makes a relatively minor contribution to the reduction in fish stocks.

Cumulative impacts on anadromous or diadromous managed species could also occur as a result of activities that obstruct fish movement in marine environments during migration periods. For example, some structures along the Beaufort Sea mainland (e.g., the West Dock) have been shown to block the movements of diadromous fishes, particularly juveniles, under certain meteorological conditions (Fechhelm 1999; Fechelm et al. 1999). Causeways such as the 40 m (131 ft) wide and 60 m (197 ft) long structure associated with the Red Dog Mine may impede coastal movement either by directly blocking fish or by modifying nearshore water conditions to the point where they might become too cold and saline for some species (Fechhelm et al. 1999). Although the presence of causeways has been an issue associated with oil development activities in the Beaufort Sea, the small size of the Red Dog causeway would likely have little effect on the coastal movements and distributions of Chukchi Sea fishes and shellfishes. However, it is anticipated that proper placement and design considerations for future causeway construction along the North Slope would alleviate the potential for such effects on fish movement.

There are several contaminant sources in the Beaufort and Chukchi Sea Planning Areas. The Red Dog Mine in Alaska is the largest lead and zinc mine in the world, and is presently the only base-metal lode mine operating in northwest Alaska. A study for the National Park Service (Hasselbach et al. 2004) showed extensive airborne transport of cadmium and lead from Red Dog Mine; although the study was focused only on the limits of the Cape Krusenstern National Monument, these contaminants are probably carried out into the Chukchi Sea. There are also natural sources of metals and hydrocarbons. Sediments, peats, and soils from the Sagavanirktok, Kuparuk, and Colville Rivers are the largest source of dissolved and particulate metals and saturated and polycyclic aromatic hydrocarbons in the development area. However, background concentrations in fish sampled in the Arctic Planning Areas are typically at background levels (Neff & Associates 2010).

There are also State oil and gas activities that can affect EFH in the Beaufort and Chukchi Seas. Factors that could affect EFH from these activities would be similar to those described above for OCS activities including underwater noise, habitat loss and disturbance, seismic survey and exploratory drilling, as well as other ancillary activities. However, the effects from non-OCS oil and gas activities could possibly be more severe than the effects from routine OCS activities because the activities are closer to shore and in shallower environments. As a consequence, more benthic EFH may be damaged, and resulting changes in sedimentation and turbidity could affect a greater proportion of the water column.

Freshwater areas used by salmon and other anadromous fish are considered to be EFH and could be affected by nearshore OCS and non-OCS oil and gas activities such as pipeline dredging or by onshore pipelines that cross bodies of water, especially streams. The primary effects of pipeline crossings would be increasing turbidity and sedimentation of the benthic environment during construction and blocking migration of anadromous fish following

construction. Any pipeline route would be required to comply with various Alaska Coastal Management Program policies. As a consequence, crossings of anadromous fish streams would be minimized and consolidated with other utility and road crossings of such streams. In addition, onshore pipelines would be designed, constructed, and maintained to reduce risks to fish habitats from a spill, pipeline break, or construction activities.

See individual sections on water quality, coastal habitats, and marine and pelagic habitats for a discussion of the effects of climate change on EFH in the Beaufort and Chukchi Sea Planning Areas. As a heavily river-influenced system, increased river discharge could alter the salinity, temperature, and turbidity regimes in nearshore areas (Hopcroft et al. 2008). Climate change is also expected to decrease the spatial extent and temporal duration of sea ice as well as make the ice thinner, an overall increase in biological productivity in the open water, and a shift to a pelagic-based rather than a benthic-based food web (Hopcroft et al. 2008). In addition, ocean acidification may reduce the availability of calcite and aragonite to marine organisms.

The total number of oil spills and the extent of affected EFH areas would likely increase under the proposed action in conjunction with increased levels of petroleum exploration and production. See Table 4.6.2-3 for oil spill assumptions for Alaska. Non-OCS activities, such as oil and gas development in State waters, domestic transportation of oil, and commercial shipping, may also result in accidental spills that could potentially impact fish resources within the Arctic. While effects on EFH resources would depend on the timing, location, and magnitude of specific oil spills, it is anticipated that most small to medium spills that occur in OCS waters would have limited effects on EFH, due to the relatively small areas likely to be exposed to high concentrations of hydrocarbons and the short period of time during which potentially toxic concentrations would be present. Large or catastrophic spills could result in long-term impacts to EFH habitat quality and managed species populations. See Section 4.4.6.4 for a detailed discussion of the impact of oil spills on EFH.

Arctic fishes could also be susceptible to adverse effects of oil spills (see Section 4.4.6.4.2). Most offshore spills would be small and likely have little effect on overall populations, since the areas with significant hydrocarbon concentrations would be localized relative to the broad distributions of most marine and anadromous fishes of the Beaufort and Chukchi Seas. However, population level effect could occur if large amounts of oil from a catastrophic spill were to reach shallow subtidal and intertidal sediments. Some anadromous species of the Alaskan North Slope could be at greater risk because of their unique life-history cycles. Juveniles of some species of whitefish (including broad whitefish, humpback whitefish, and least cisco) are intolerant of highly saline marine conditions. During their summer feeding dispersals in the Beaufort Sea, these species tend to remain within a narrow band of warm, low-salinity water along the coast. Offshore barrier islands offer additional protection by helping to maintain low-salinity corridors. Thus, unlike most subarctic fishes, whitefish along the North Slope have a reduced capacity to bypass localized disruptions to their migration corridor by moving offshore and around the impasse. An oil spill, even one of limited area, could block the narrow nearshore corridor and prevent fishes from either dispersing along the coast to feed or returning to their overwintering grounds in rivers of the North Slope. If a spill were localized in the sensitive nearshore zone, its location would also make it more amenable to cleanup by

environmental response teams. There is no tanker traffic on the North Slope, which eliminates the possibility of a collision spill in that area.

Oil from spills occurring under the ice in the Beaufort and Chukchi Seas could remain trapped there throughout the winter unless removed, which, while difficult, could be done. Water quality would be negatively impacted, and overwintering eggs, larvae, and invertebrate prey would likely be killed in affected areas. Surface spills occurring in the summer months would temporarily reduce EFH for surface-dwelling eggs, larvae, and pelagic prey species. Oil reaching nearshore areas could travel short distances upriver in anadromous fish streams as a result of tidal water movements, and some oil could become trapped in the interstitial spaces of the sediments. In such cases, EFH for salmon eggs and larvae could be affected. See Section 4.4.3.3 for a detailed discussion of accidental oil spills in ice and ice-free conditions.

Conclusion. Impacting factors for EFH include both OCS and non-OCS activities. Non-OCS activities with a potential to impact EFH in the Beaufort and Chukchi Sea Planning Areas include oil and gas production in State waters, sediment dredging and disposal, and vessel traffic. Impacts from OCS activities would be limited by specific lease stipulations. Cumulative impacts to EFH as a result of OCS and non-OCS program activities would be minor to moderate, proportional to the EFH area affected. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.6.3.3).

Accidental releases of oil and gas from OCS and non-OCS facilities could also have effects on EFH. The cumulative impacts of past, present, and future oil spills on EFH would be minor to moderate. The incremental impacts of accidental spills associated with the proposed action on EFH would be small to large, depending on the location, timing, duration, and size of spills; the proximity of spills to particular fish habitats; and the timing and nature of spill containment and cleanup activities (see Section 4.4.6.3.3). While most accidents related to OCS activities assumed under the cumulative spill scenario would be small and would have relatively small incremental impacts on EFH, oil that reaches coastal wetlands could have more persistent impacts and could require remediation. Spills in deeper water, whether from OCS or non-OCS sources, are unlikely to have overall population-level effects on fish resources because of the relatively small proportion of similar available fish habitats that would come in contact with released oil at concentrations great enough to elicit toxic effects. Oil spills that have the greatest potential to impact EFH and managed species are those that occur in shallower subtidal and intertidal areas and spills that reach areas at the same time substantial numbers of eggs or larvae of managed species are present.

4.6.4 Marine and Coastal Fauna

Previous BOEM/MMS NEPA documents for OCS lease sales have addressed cumulative impacts on marine and coastal fauna. Unless referenced otherwise, the following cumulative impacts discussion includes information provided in those NEPA documents prepared for the GOM (see http://www.gomr.boemre.gov/homepg/regulate/environ/nepa/nepaprocess.html) and for Alaska (see http://alaska.boemre.gov/ref/eis_ea.htm).

4.6.4.1 Gulf of Mexico Region

4.6.4.1.1 Mammals.

Marine Mammals. The cumulative analysis considers past, ongoing, and foreseeable future human and natural activities that may occur and adversely affect marine mammals in the same general area. These activities include effects of the OCS Program (proposed action and prior and future OCS sales), oil and gas activities in State waters, commercial shipping, commercial fishing, recreational fishing and boating activities, military operations, scientific research, and natural phenomena. Specific types of impact-producing factors considered include noise from numerous sources, pollution, ingestion and entanglement in marine debris, vessel strikes, habitat degradation, military activities, industrial development, community development, climate change, and natural catastrophes. Section 4.4.7.1.1 provides the major impact-producing factors related for the proposed action.

Routine Activities.

OCS Activities. Marine mammals and their habitats in the GOM could be affected by a variety of exploration, development, and production activities as a result of the proposed and future OCS leasing actions (see Section 4.4.7.1.1). These activities include seismic exploration, offshore and onshore infrastructure construction, discharge of operational wastes, vessel and aircraft traffic, and explosive removal of platforms. Impacts on marine mammals from these activities may include physical injury or death; behavioral disturbances; lethal or sublethal toxic effects; and loss of reproductive, nursery, feeding, and resting habitats.

Potential impacts (primarily behavioral disturbance) on marine mammals from OCS-related seismic activity would be short term and temporary, and not expected to result in population level impacts for any affected species with implementation of appropriate mitigation measures.

Impacts from OCS construction and operation activities could include the temporary disturbance and displacement of individuals or groups by construction equipment and long-term disturbance of some individuals from operational noise. No long-term, population-level effects are expected because individuals most affected by these impacts would be those in the immediate vicinity of the construction site or operational platform and disturbance of individuals during construction would be largely temporary.

Operational and waste discharges (e.g., produced water, drilling muds, and drill cuttings) would be disposed of through downhole injection into NPDES-permitted disposal wells, and would not be expected to result in any incremental impacts on marine mammals. Liquid wastes (such as bilge water) may also be generated by OCS support vessels and on production platforms. While these wastes may be discharged (if permitted) into surface waters, they would be rapidly diluted and dispersed, and are expected to result in minor incremental impacts on marine mammals. Drilling and production wastes may contain materials such as metals and hydrocarbons, which can bioaccumulate through the food chain into the tissues of marine

mammals. Although the bioaccumulation of anthropogenic chemicals has been reported for a variety of marine mammals, adverse impacts or population-level effects resulting from such bioaccumulation have not been demonstrated (Norstrom and Muir 1994; Muir et al. 1999).

Marine mammals could be temporarily disturbed by OCS vessel traffic (all species) or incur injury or death from collisions with support vessels (primarily larger, slower moving cetaceans). The addition of up to 600 OCS vessel trips per week under the proposed actions could result in minor to moderate incremental impacts to marine mammals, be largely short term, and not result in population-level effects. Noise from helicopter overflights would be transient. Impacts on marine mammals would be behavioral in nature, primarily resulting in short-term disturbance in normal activities, and would not be expected to result in population-level effects. Appropriate mitigation measures could lessen the potential for incremental impacts from vessel and helicopter traffic.

There have been no documented losses of marine mammals resulting from explosive removals of offshore oil and gas structures, but there are sporadic incidents reported of marine mammals being killed by underwater detonations (Continental Shelf Associates 2004; MMS 2007, 2008). Harassment of marine mammals as a result of a non-injurious physiological response to the explosion-generated shock wave as well as to the acoustic signature of the detonation is also possible. However, explosive platform removals would comply with BOEM guidelines and would not be expected to adversely affect marine mammals in the GOM.

All of the marine mammals in the GOM are potentially exposed to OCS-industrial activities (particularly noise) due to the rapid advance into the GOM deep oceanic waters by the oil and gas industry in recent years; whereas, over two decades ago, the confinement of industry to shallower coastal and continental shelf waters generally only exposed the bottlenose dolphin, Atlantic spotted dolphin, and West Indian manatee to industry activities and their related sounds. Industry noise sources include seismic operations, fixed platforms and drilling rigs, drilling ships, helicopters, vessel traffic, and explosive operations (particularly for structure removal).

<u>Non-OCS Activities.</u> A number of non-OCS activities such as State oil and gas exploration and development, commercial and recreational fishing, vessel traffic, industrial and municipal discharges, climate change, and invasive species could also affect marine mammals in the GOM.

Oil and Gas Exploration and Development in State Waters. Exploration, construction, and operation activities associated with State leases would occur in nearshore and coastal areas, while OCS platforms and pipelines would be located away from coastal areas (with the exception of relatively few pipeline landfalls and onshore bases and processing facilities). Thus, State oil and gas leasing activities may be expected to have a greater potential for affecting marine mammals in coastal habitats than would the proposed OCS actions. The marine mammal species most likely affected by State leases are the bottlenose dolphin, Atlantic spotted dolphin, and the West Indian manatee.

Commercial Fisheries. Commercial fisheries are an impacting factor for marine mammals in the GOM. These fisheries employ a variety of methods, such as longlines, seines,

trawls, and traps, which can result in the entanglement, injury, and death of mammal mammals. For more than a decade, few human-induced mortalities or serious injuries of marine mammals due to commercial fishery interactions have occurred in the GOM. The following interactions with commercial fisheries were reported by Waring et al. (2010):

- In 2008, one mortality and two serious injuries of Risso's dolphins in the GOM related to entanglement interactions with the pelagic longline fishery.

- In 2008, there was one killer whale released alive after an entanglement incident with the pelagic longline fishery.

- In 1999, there was one reported stranding of a false killer whale that was likely caused by fishery interactions or other human-related causes evidenced by its fins and flukes having been amputated.

- From 1998 through 2007, there were no reported fishing-related mortalities of short-finned pilot whales in the GOM. However, one animal was released alive after an entanglement interaction with the pelagic longline fishery.

- From 1998 through 2007, there were no reported fishing-related mortalities of beaked whales in the GOM. However, during 2007, one unidentified beaked whale was released alive after an entanglement interaction with the pelagic longline fishery.

- From 1998 through 2008, there were no reported fishing-related mortalities of sperm whales in the GOM. However, one animal was released alive with no serious injuries after an entanglement interaction with the pelagic longline fishery.

- Some bottlenose dolphins have suffered mortalities associated with the shark bottom longline fishery, pelagic longline fishery, shrimp trawl fishery, blue and stone crab trap/pot fisheries, menhaden purse seine fishery, and gillnet fishery. Strandings of bottlenose dolphins have also occurred throughout the northern GOM from both human-caused and natural events. Human-caused strandings result from gear entanglement, mutilation, gunshot wounds, vessel strikes, contaminants, and ingestion of foreign objects.

- Fishery interactions likely caused the stranding of two Atlantic spotted dolphins in 2004.

- A stranded spinner dolphin had monofilament line around its tail and abrasions around its flukes as though it had been towed. It also had possible propeller marks.

Vessel Traffic. There are a number of non-OCS activities that are occurring in the GOM that could result in collisions between marine mammals and ships. These activities include

dredging and marine disposal, the domestic transportation of oil and gas, State oil and gas development, foreign crude oil imports, commercial shipping and recreational boating, commercial fisheries, and military training and testing activities. Vessel traffic associated with these activities may also disturb normal behaviors with unknown long-term consequences. With all of these activities, the GOM is one of the world's most concentrated shipping areas (USACE 2003a, b). The GOM also supports an extensive commercial fishery, as well as recreational boating. Because of the very large number of vessels typically present in the GOM, the potential for vessel-marine mammal collisions is high, and may be expected to increase for the foreseeable future. The amount of OCS-related vessel traffic anticipated as a result of the Program is provided in Table 4.4.1-1.

Contaminants. There are a number of non-OCS facilities or activities that discharge wastes to GOM waters, and thus may expose marine mammals to potentially toxic materials or solid debris that could become entangled or ingested. These facilities or activities include sewage treatment plants, industrial manufacturing or processing facilities, electric generating plants, cargo and tanker shipping, cruise ships, commercial fishing, and recreational pleasure craft. In addition, the Mississippi River (and to a lesser extent, other rivers and streams that discharge to the northern GOM) discharges waters containing suspended sediments, fertilizers, herbicides, and urban runoff (Rabalais et al. 2001, 2002). While marine mammals are exposed to a variety of contaminants from these discharges, little is known about the levels of contaminants at which lethal or sublethal effects may be incurred. These discharges may also affect habitat quality in the vicinity of the discharges.

The role of exposure to toxins to marine mammal mortality is unknown. Elevated levels of chemicals such as polychlorinated biphenyls (PCBs) and pesticides have been measured in individuals sampled from waters that receive municipal, industrial, and agricultural inputs and have high concentrations of contaminants (such as in the immediate vicinity of Tampa Bay) (NOAA 2004b). There is little information, however, regarding the level at which tissue concentrations of contaminants may result in lethal or sublethal effects.

Climate Change. Marine mammal populations throughout the GOM may be adversely affected by climate change and, to a lesser extent, by hurricane events. There is growing evidence that climate change is occurring, and potential effects in the GOM may include a change (i.e., rise) in sea level or a change in water temperatures. Such changes could affect the distribution, availability, and quality of feeding habitats and the abundance of food resources. It is not possible at this time to identify the likelihood, direction, or magnitude of any changes in the environment of the GOM due to changes in the climate, so it is too speculative to further discuss climate change impacts on marine mammals.

Natural Catastrophes. Severe storm events such as hurricanes may result in direct or indirect mortality of manatees and have the potential to impact their nearshore habitats (Langtimm and Beck 2003). Heightened wave action and intensity could alter nearshore channels affecting the abundance and distribution of shallow-water habitats such as lagoons and bays, while sediments deposited into foraging habitats by storm waves may alter the thermal environment and affect aquatic vegetation in feeding habitats. Because hurricanes are annual events that are an inherent component of the overall GOM ecosystem, it may be assumed that

marine mammals of the GOM have experienced hurricane impacts in the past and may be expected to continue to experience future hurricane events.

Other Impacting Factors. Marine mammals may also be impacted by other factors such as unusual mortality events (UMEs) and invasive species. A UME is an unexpected stranding that involves a significant die-off of any marine mammal population, and demands immediate response (NMFS 2011b). Since establishment of the UM program in 1991, there have been 53 formally recognized UMEs in the U.S., with 33% of them occurring in the GOM (NMFS 2011b). Species in the GOM most commonly involved in UMEs are bottlenose dolphins and manatees. Causes of UMEs have been determined for 25 of the UMEs, and include infections, biotoxins (particularly domoic acid and brevetoxin), human interactions, and malnutrition. Red tides in the GOM, caused by annual blooms of the dinoflagellate Karenia brevis, are the source of UMEs caused by biotoxins in the GOM (NMFS 2011b). Invasive species could affect some marine mammals by disrupting local ecosystems and fisheries of the GOM. As examples, the Australian jellyfish (*Phylloriza punctata*) introduced to the northern GOM may feed heavily on juvenile fish and fish eggs (Ray 2005), while exotic shrimp viruses may affect shrimp and other crustaceans such as copepods and crabs (Batelle 2001). These could affect the prey base for some marine mammals.

Accidents. Marine mammals could be exposed to oil accidentally released from platforms, pipelines, and vessels (Table 4.4.2-1). Potential non-OCS sources of oil spills in the planning area include the domestic transportation of oil, State oil and gas development, and natural sources such as oil seeps. Accidental oil releases from OCS activities and other sources could expose marine mammals to oil by direct contact or through the inhalation or ingestion of oil or tar deposits. The magnitude and duration of exposure will be a function of the location, timing, duration, and size of the spill; the proximity of the spill to feeding and other important habitats; the timing and nature of spill containment; and the status of the affected animals. Depending on their location, as well as the location of non-OCS oil sources, accidental spills associated with the proposed action could contribute to the overall exposure of marine mammals in the northern GOM. Most of the small to medium spills would have limited effects on marine mammals due to the relatively small areas likely to incur high concentrations of hydrocarbons and the short period of time during which potentially toxic concentrations would be present. The magnitude of impact would be expected to increase should a spill occur in habitats important to marine mammals or affect a number of individuals from a population listed under the ESA. However, some spills from OCS activity may locally represent the principal source of oil exposure for some species, especially for spills contacting important coastal and island habitats.

Conclusion. Cumulative impacts on marine mammals in the GOM as a result of ongoing and future OCS and non-OCS activities and natural phenomena could be minor to moderate over the next 40 to 50 yr. Non-OCS activities or phenomena include climate change, natural catastrophes, contaminant releases, vessel traffic, commercial fishing, and invasive species. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.7.1.1).

Marine mammals may also be adversely affected by exposure to oil that is accidentally released from OCS and non-OCS activities as well as naturally occurring seeps. The cumulative

impacts of past, present, and future oil spills on marine mammals would be minor to moderate. The incremental impacts of accidental spills associated with the proposed action on marine mammals would be small to large, depending on the location, timing, duration, and size of the spill; the proximity of the spill to feeding and other important habitats; the timing and nature of spill containment; and the status of the affected animals (see Section 4.4.7.1.1).

Terrestrial Mammals. Under the proposed action, terrestrial mammals in the GOM are not expected to be affected by normal OCS-related activities (Section 4.4.7.1.1). The terrestrial mammals considered in the impact analysis for the proposed action are four federally endangered GOM coast beach mouse subspecies and the federally endangered Florida salt marsh vole. Because of the listing of these species under the ESA, as well as their occurrence in protected areas, the siting and construction of any onshore facilities associated with the proposed action would be required to take into account these species and their habitats, and construction activities would not be allowed in the habitats of these species.

Present beach mice habitat is no longer of optimal quality because of historical beach erosion, construction, and tropical storm damage. Dredge-and-fill activities occur throughout the nearshore areas of the U.S. and disrupt beach and transport, which could affect coastal systems of dunes where beach mice live. Coastal construction and traffic can be expected to threaten beach mice populations on a continual basis. Natural catastrophes including storms, floods, droughts, and hurricanes can substantially reduce or eliminate beach mice. Storms can wash large amounts of debris into dune and marsh habitats. Trash and debris may be mistakenly consumed by beach mice or may entangle them. Cleanup efforts to remove debris could result in adverse habitat impacts. Other activities that threaten beach mice and the Florida salt marsh vole include predation and competition, artificial lighting, and coastal spills. Predation from feral and free-ranging cats and dogs, feral hogs, coyotes, and red foxes, and competition with common house mice could reduce beach mice and Florida salt marsh vole populations. Isolation of small populations of beach mice due to habitat fragmentation can preclude gene flow between populations and cause a loss of genetic diversity. Separation of frontal dune habitat from scrub habitat by a highway can make a beach mouse especially vulnerable to hurricane impacts. Global climate change and sea level rise could also impact the species (Bird et al. 2009; Hatley 2003; USFWS 2007, 2008, 2009, 2010; Wooten 2008).

Activities in the GOM that could result in the accidental release of oil and may affect terrestrial mammals and their habitats include oil production from prior, proposed, and future OCS sales; domestic transportation of oil; State oil development; foreign crude oil imports; and military training activities involving open-water ship refueling. If spills from these activities occur in the vicinity of, or are transported by GOM currents to, the habitats of the beach mice or the Florida salt marsh vole, potential impacts would be similar in nature to those identified for the proposed action. Impacts associated with an oil spill may include loss of thermoregulatory ability from oiling of fur, lethal and sublethal toxic effects from inhalation or ingestion of oil or oil-contaminated foods, a decrease in food supply due to oiled vegetation, a decrease in habitat quantity and quality due to oiling of beach sands, and the fouling of burrows and nests. In addition, spill response activities could further impact habitats due to beach cleanup activities and vehicle and pedestrian traffic.

Given the relatively small number of spills that are expected under the proposed action and during the life of the Program (Table 4.4.2-1), the requirement under the Oil Pollution Act of 1990 to prevent contact of protected or sensitive habitats (such as the habitats of the beach mice and the salt marsh vole) with spilled oil, and the need of a spill to be associated with environmental conditions (such as a storm surge sufficient to transport the spilled oil over foredunes) that could favor exposure of the species and their habitats, relatively few cumulative impacts may be expected from accidental oil spills from all potential sources, and the contribution of spills associated with the proposed action is expected to be limited.

Conclusion. Cumulative impacts on terrestrial mammals in the GOM as a result of ongoing and future OCS and non-OCS program activities could be minor to moderate over the next 40 to 50 yr. Non-OCS activities or phenomena that may affect populations of terrestrial mammals include climate change, natural catastrophes, contaminant releases, vehicle traffic, and invasive and feral species. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.7.1).

Terrestrial mammals may also be adversely affected by exposure to oil that is accidentally released from OCS and non-OCS operations. The cumulative impacts of past, present, and future oil spills on terrestrial mammals would be minor to moderate. The incremental impacts of accidental spills associated with the proposed action on terrestrial mammals would be small to large, depending on the location, timing, duration, and size of the spill; the proximity of the spill to feeding and other important habitats; the timing and nature of spill containment; and the status of the affected animals (see Section 4.4.7.1).

4.6.4.1.2 Marine and Coastal Birds. Section 4.4.7.2.1 discusses impacts on marine and coastal birds in the GOM resulting from the proposed action (OCS program activities from 2012 to 2017). Cumulative impacts on marine and coastal birds result from the incremental impacts of the proposed action when added to impacts from existing and reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities. Table 4.6.1-1 presents the exploration and development scenario for the GOM cumulative case (encompassing the proposed action and other OCS program activities) over the next 40 to 50 yr. A number of OCS program activities could affect GOM marine or terrestrial birds or their habitats; these include offshore structure placement and pipeline trenching, offshore structure removal, operational discharges and wastes, service vessel and aircraft traffic, construction and operation of onshore infrastructure (including new pipeline landfalls), and noise. Potential impacts on marine and coastal birds from service program activities include injury or mortality of birds from collisions with platforms, vessels, and aircraft; exposure to operational discharges and ingestion of trash or debris; loss or degradation of habitat due to construction activities; and behavioral disturbance due to the presence of, and noise generated by, equipment and human activity.

Non-OCS program activities affecting marine and coastal birds include dredging and marine disposal; coastal and community development; onshore and offshore construction and operations of facilities associated with State oil and gas development and with the extraction of nonenergy minerals; commercial and recreational boating; and small aircraft traffic. Potential

impacts on marine and coastal birds from these activities are similar to those under the OCS program and include injury or mortality of birds from collisions with platforms associated with State oil and gas development and other onshore and offshore structures (e.g., radio, television, cell phone towers or wind towers); non-energy mineral mines (e.g., sand and gravel and other hard minerals mined in the northern part of the GOM; onshore industrial, commercial, and residential development; exposure to discharges from permitted point sources such as sewage treatment discharges and nonpoint sources such as irrigation runoff, or accidental releases (e.g., oil spills), as described in Section 4.6.2.1.1 and Table 4.6.2-1; exposure to emissions from various onshore and offshore sources (e.g., power generating stations, refineries, and marine vessels), as described in Section 4.6.2.1.2; ingestion of trash or debris; loss or degradation of habitat due to construction and operations activities; and behavioral disturbance due to the presence of noise generated by equipment and human activity. Other trends such as sea level rise and increasing seawater temperature brought on by global climate change, as well as extreme wind conditions from storm events, are also expected to adversely affect marine and coastal birds over the next 40 to 50 yr.

Injury or Mortality from Collisions. Annual bird collision mortalities under the proposed action (estimated at about 10,000 to 22,500) represent less than 0.01% of the hundreds of millions of birds that annually migrate across the GOM (Russell 2005). Under the cumulative scenario, annual collision mortality (estimated at 200,000 birds under current OCS activities in the GOM) could increase by about 8%. During the life of the proposed action from 2012 to 2017, older platforms would be decommissioned and removed as new platforms are installed, so it is likely that the estimated 200,000 collision-related deaths per year would persist throughout the life of the program. The proposed action would likely result in a small incremental increase of the total annual bird collision mortality in the GOM that occurs from collisions with other OCS and non-OCS structures (Klem 1990; Kerlinger 2000).

Exposure to Wastewater Discharges and Air Emissions. The discharge of operational wastes and air emissions from current OCS- and non-OCS-related vessel traffic and platform operations is strongly regulated and would continue to be regulated over the next 40 to 50 yr. However, such wastes and emissions would still expose marine and coastal birds to potentially toxic materials or to solid debris that could be ingested or result in entanglement. In addition, the Mississippi River, and, to a lesser extent, other rivers and streams annually discharge waters containing suspended sediments, agricultural fertilizers and herbicides, and urban runoff to the northern GOM (Rabalais et al. 2001, 2002). Birds and their habitats in the vicinity of these discharges may be exposed to lethal and sublethal levels of contaminants. Operational wastewater discharges and air emissions associated with the proposed action would contribute to the overall cumulative risk of toxic exposure and debris ingestion or entanglement of existing OCS and non-OCS wastewater discharges and air emissions in the GOM, but the incremental increase in impact is expected to be small relative to these other activities.

Under the proposed action, marine and coastal birds could be exposed to oil accidentally released from platforms, pipelines, and marine vessels, and would be most susceptible to adverse impacts from spills occurring in coastal areas and affecting feeding and nesting areas. Accidental oil releases occur in the GOM from a variety of non-OCS related activities, such as the domestic transportation of oil, import of foreign crude oil, and State development of oil.

Crude oil may also enter the environment of the northern GOM from naturally occurring seeps (MacDonald et al. 1996; MacDonald 1998b; Mitchell et al. 1999; NRC 2003). Oil releases from all sources may expose marine and coastal birds via direct contact or through the inhalation or ingestion of oil or tar deposits (see Section 4.4.7.2.1).

The spills that could occur in the cumulative scenario are shown in Table 4.6.1-3. Spills from non-OCS sources could occur from import tankers, State oil and gas operations, and coastal transportation of crude and refined petroleum products. Releases from natural seeps in the northern part of the GOM have been estimated at about 73,000 tons (526,000 bbl) per year (Kvenvolden and Cooper 2003). Most spills associated with the proposed action would be relatively small (less than 50 bbl) (Table 4.4.2-1). Depending on their location, accidental spills associated with the proposed action could represent a major component of the overall exposure of marine and coastal birds in the GOM OCS Planning Areas.

The magnitude and duration of exposure, and any subsequent adverse effects, would be a function of the location, timing, duration, and size of the spill; the proximity of the spill to feeding habitats; and the timing and nature of spill containment. Spills in nearshore coastal areas have the greatest potential for impacting high concentrations of bird populations. Most activities associated with the Program would take place in deep or ultradeep waters. Some seabirds spend a significant amount of time offshore and could be exposed to accidental oil spills that occur in these deep waters, but even marine birds that remain in coastal waters could be exposed to accidental oil spills if they were to occur closer to shore.

Loss and Degradation of Habitat. Marine and coastal birds could be affected by platform construction and removal activities, and pipeline trenching, which could disrupt behaviors of nearby birds. Platforms constructed under the proposed action would increase the number of offshore platforms present in open-water areas of the northern GOM; and these structures may be used by birds to rest or avoid bad weather conditions during spring and fall migrations across the GOM (see Section 4.4.7.2). The proposed action would increase the number of platforms to be removed by only 9% of current OCS numbers, and up to 75% of the construction of new platforms would occur in deep water (i.e., 300 m [1,000 ft] or greater), well away from coastal areas. Under the proposed action, there would also be construction associated with no more than 12 new pipeline landfalls and offshore pipeline placement (Table 4.4.1-1). These platform and pipeline construction activities could add to the overall disturbance level of birds and their habitats from all construction sources in the GOM.

Platform construction and removal under the proposed action would be localized (primarily in deep water areas) and short in duration, and would result in only a small increase in the overall level of disturbance incurred by birds and their habitats from all construction activities in the GOM OCS Planning Areas. Pipeline trenching and landfall construction that would occur under the proposed action would similarly be of short duration and limited in extent (associated with no more than 12 new landfalls), and would be expected to contribute little to overall levels of bird disturbance that occur in coastal areas of the GOM on a much more regular basis from existing OCS and non-OCS construction activities, such as channel construction and maintenance, creation of harbor and docking areas and facilities, State oil and gas development

(including platform construction and removal), non-energy minerals extraction, and pipeline emplacement.

Vessel traffic potentially disturbs, feeding and nesting birds with unknown long-term consequences. The GOM is one of the world's most concentrated commercial shipping areas (COE 2003a,b), and it supports extensive commercial fishing and recreational boating. As a result, OCS and non-OCS program-related vessel traffic disturbs birds on a daily basis. This trend is expected to increase as marine traffic in the GOM increases over the next 40 to 50 yr (see Table 4.6.2-1). OCS program-related marine vessel traffic in the GOM could be as high as 1,900 trips per week over the next 40 to 50 yr; vessel traffic associated with the proposed action represents about 27% of this traffic (Section 4.6.2.1). Non-OCS program traffic includes that related to crude oil and natural gas imports, commercial container vessels, military and USCG vessels, cruise ships, commercial fishing, and small watercraft. In 2010, the Port of New Orleans alone handled about 7,500 vessel calls (mainly tanker and dry bulk carrier), about 140 vessel calls per week (USDOT 2011b). Impacts on water quality from marine traffic arise from regular discharges of bilge water and waste, leaching of antifouling paints, and incidental spills (MMS 2001d), although operational discharges and spillage from marine vessels have declined substantially in the past few decades (NRC 2003b). Vessel traffic associated with the proposed action would result in a small increase in the overall disturbance of birds in the GOM region.

Disturbance Due to Noise. Noise generated during construction activities and normal operations (e.g., helicopter overflights) may disturb marine and coastal birds, causing a short-term change in normal behavior and potentially disrupting feeding and nesting activities. Non-OCS activities that currently generate noise in the GOM include construction and/or operation of offshore structures for State oil and gas development; offshore LNG facilities and tankers; hard mineral extraction; dredging and marine disposal; commercial and recreational vessel traffic; small aircraft flight; and military training and testing activities. These activities are expected to continue or increase in the foreseeable future. Although noise generated as a result of the proposed action would likely add only a small increment to the overall (cumulative) noise levels in the GOM, locally it could represent the dominant noise in the environment, resulting in more moderate impacts on marine and coastal birds.

Climate Change and Storm Events. Populations of marine and coastal birds throughout the GOM may be adversely affected by climate change and, to a lesser extent, by storm events (including hurricanes). As discussed in Section 3.3, there is growing evidence that climate change is occurring, and potential effects in the GOM may include sea level rise and increases in water temperatures in the GOM. Over time these changes will result in a loss of wetlands in the GOM, important water bird habitat. Climate change could also affect the distribution, availability, and quality of feeding habitats and the abundance of food resources. It is not possible at this time to identify the likelihood, direction, or magnitude of any changes in the environment of the GOM due to changes in climate, so it is too speculative to identify the extent of effects on GOM populations of marine and coastal birds. It should be noted that such information is not essential to a reasoned choice among OCS program alternatives, even in a cumulative analysis, because the information missing here is missing across the board for all action alternatives.

Severe storm events such as hurricanes may result in direct or indirect mortality of marine and coastal birds and may impact important coastal habitats. Heightened wave action and intensity could alter nearshore channels, affecting the abundance and distribution of shallow-water habitats such as lagoons and bays, while sediments deposited into foraging habitats by storm waves may alter the thermal environment and affect aquatic vegetation in feeding habitats. Extreme wind conditions could damage or destroy historic rookery sites or disrupt nesting birds. Because storms (including hurricanes) are annual events that are an inherent component of the overall GOM ecosystem, it could be assumed that marine and coastal birds have experienced and largely tolerated extreme weather conditions in the past and may be expected to continue to do so in the foreseeable future. The occurrences and aftermaths of Hurricanes Katrina and Rita in 2004, however, have impacted avian habitats on a large scale throughout the GOM. Large areas of coastal wetlands have been converted to open-water habitat, potentially affecting avian species that utilized the wetlands for foraging, nesting, and as stopover points during migration (Congressional Research Service 2005). Impacts on these habitats have the potential to result in population-level impacts affecting both abundance and distribution of some species. For example, the coastal habitats that were significantly impacted in southeastern Louisiana and the Galveston Bay area of Texas support nesting by up to 15% of the world's brown pelicans and 30% of the world's sandwich terns (FWS 2006). Impacts on these habitats could reduce future nesting success and affect overall population levels of these species.

Hurricane impacts on bottomland forest habitat along the Louisiana and Mississippi coasts represent further loss of avian habitat affecting many different species; up to 70% of the cavity trees used by the endangered red-cockaded woodpecker at Big Branch Marsh National Wildlife Refuge were destroyed by Hurricane Katrina (FWS 2006). The long-term effects of avian habitat loss due to these hurricanes is not known, and agencies such as the USFWS and USGS are implementing numerous studies and monitoring programs to determine the extent and magnitude of impacts on affected avian populations. The occurrence of similar magnitude storms during the life of the 5-year OCS program could result in population-level impacts on some bird species.

Conclusion. Marine and coastal birds in the GOM could be adversely affected by activities associated with the proposed action as well as those associated with other OCS program and non-OCS program activities. Potential impacts include injury or mortality of birds from collisions with platforms associated with OCS and State oil and gas development and other onshore and offshore structures (e.g., radio, television, cell phone, or wind towers), non-energy mineral mines; onshore industrial, commercial, and residential development; exposure to discharges from permitted point sources or accidental releases; exposure to emissions from various onshore and offshore sources; ingestion of trash or debris; loss or degradation of habitat due to construction and operations activities; and behavioral disturbance due to the presence of, and noise generated by, equipment and human activity. Other trends such as sea level rise and increasing seawater temperature brought on by global climate change, as well as extreme wind conditions from storm events, are also expected to adversely affect marine and coastal birds over the next 40 to 50 yr. While the cumulative impact of all OCS and non-OCS activities in the GOM is expected to be moderate, the incremental impact due to the proposed action would be small (see Section 4.4.7.2.1).

Marine and coastal birds may also be adversely affected by exposure to oil (via direct contact or through the inhalation or ingestion of oil or tar deposits) that is accidentally released from OCS and non-OCS activities, especially near coastal areas and affecting feeding and nesting areas. The incremental impacts of accidental spills associated with the proposed action on marine and coastal birds would be small to large, depending on the location, timing, duration, and size of the spill; the proximity of the spill to feeding and nesting areas; the timing and nature of spill containment; and the status of the affected birds (see Section 4.4.7.2.1).

4.6.4.1.3 Fish. There are numerous fish species that inhabit different niches throughout the surface waters, water column, and benthic environments of the GOM. Routine activities will cumulatively have varied effects on these fish populations depending on their habitat and life history. Impacts on fish resulting from ongoing and future routine OCS program activities, including those of the proposed action, could result primarily from noise (vessel, seismic surveys, and construction), well drilling, pipeline placement (trenching, landfalls, and construction), platform placement (anchoring, mooring, and removal, except in deep waters) and routine discharges (drilling, production, platform, and vessel). Accidental oil spills are also counted among OCS program-related activities. Cumulative impacts could result from the combination of the proposed action and past present and reasonably foreseeable future OCS and non-OCS activities.

Routine OCS activities that temporarily disturb sediments and increase turbidity include installation of new pipelines and platforms and discharges of drill cuttings and associated fluids. This could cause soft-bottom fish such as Atlantic croaker, sand sea trout, Atlantic bumper, sea robins, and sand perch to temporarily move from or be attracted to the disturbed area. Fish species that are normally associated with reefs, such as snappers, groupers, grunts, and squirrelfishes, may also move from areas of increased turbidity. Sedimentation could smother eggs, larvae, and juvenile fishes as well as the benthic prey of some of these fish species. See Table 4.6.2-1 for a quantification of bottom disturbance and drilling and operational discharges expected during the life of the Program. The impacts of routine activities (exploration and site development, production and decommissioning) on fish communities are discussed in detail in Section 4.4.7.3.1. Overall, routine activities represent up to a minor disturbance, primarily affecting demersal fishes, with the severity of the impacts generally decreasing dramatically with distance from bottom-disturbing activities.

Up to 2,100 additional platforms would be constructed under ongoing and future OCS activities, including up to 450 from the proposed action. The addition of new platforms may act as fish attracting devices (FADs). Many reef species, as well as highly migratory species, use platforms as habitat. There has been some speculation that an increase in FADs could impact the migration patterns of highly migratory species. While many platforms may be allowed to remain as artificial reefs, removal of platforms will reduce available substrate and structures for these fish and some of their prey species. Some fish will be killed in the process of these platform removals, especially when explosives are used to accomplish the removals. A total of up to 1,250 platforms would be subject to explosive removal over the life of the Program, including up to 275 platforms under the proposed action. A detailed discussion of oil platforms as FADs can be found in Section 4.4.7.3.1.

Non-OCS actions may also negatively influence fish resources in various life stages and habitats. Non-OCS oil and gas exploration and production activities in GOM State waters occur primarily off Louisiana and Texas, and off Alabama in the vicinity of Mobile Bay. The States of Florida and Mississippi have had limited activities in State waters, with a moratorium on drilling activity now in effect in Florida waters. The increasing presence of offshore LNG facilities could lead to impacts associated with entrainment and impingement of eggs, larvae, and juvenile lifestages and discharges of water used in the vaporization process. In addition to the thermal discharge, biocides are also discharged from the facilities. Other non-OCS activities that could impact fish communities include non-OCS activities with a potential to impact marine benthic and pelagic habitats, such as sand mining, sediment dredging and disposal, anchoring, offshore marine transportation, and pollutant inputs from point and non-point sources. Many of these activities would affect bottom-dwelling fishes at various life stages as well as their food sources in a manner similar to OCS bottom-disturbing activities (Section 4.4.7.3.1).

Commercial fishing practices that are indiscriminate, such as some types of trawling and pots, are responsible for significant amounts of bycatch that can injure or kill juveniles of many fish species. These types of fishing practices could damage future year classes, reduce available prey species, and damage benthic habitat for many GOM fish resources. Sportfishing may also contribute significantly to cumulative effects on some fishery resources. As a consequence of the pressure fishing places on fishery resources, appropriate management is required to reduce the potential for depletion of stocks due to overharvesting. Even with management, the possibility of overfishing still exists.

The eutrophication that has contributed to the hypoxic zone in the GOM will continue to act as a source of lethal and sublethal stress to fish communities. In addition, natural events, including hurricanes and turbidity plumes, could also cause localized damage to important habitat areas and could affect individuals or populations. However, the GOM fish community as a whole should be adapted to such natural events.

Climate change could affect fish communities through direct physiological action, habitat loss, and by altering large-scale oceanographic and ecosystem processes (Section 3.8.4.1). At the level of individual behavior and physiology, increasing water temperature could increase the spread and virulence of new and existing pathogens, and alter reproductive rates by speeding growth and altering the timing of migrations (including reproductive movements). Fish in river-influenced systems such as the GOM would be particularly susceptible to changes in salinity, turbidity, and temperature linked to changes in the hydrology of the Mississippi River and Atchafalaya River. At larger scales, climate change could promote the range expansion of new species into the GOM, reduce or eliminate critical fish habitats including estuarine waters and coral reef due to sea level rise, and increase the size of the GOM "dead zone," reducing the amount of benthic habitat available to demersal fishes (Rabalais et al. 2010).

Oil spills resulting from both OCS and non-OCS activities could impact fish communities in the GOM. See Table 4.6.1-3 for anticipated oil spills over the life of the Program. Catastrophic spill assumptions are provided in Table 4.4.2-2. Crude oil may also enter the environment from naturally occurring seeps. Large spills may also occur from tankers carrying imported oil in the GOM. The potential effects of spills from non-OCS activities would be

similar to those described for OCS activities (Section 4.4.7.3.1). Most adult fish in marine environments are highly mobile and are capable of avoiding high concentrations of hydrocarbons, although they may be subject to sublethal exposures. However, eggs and larvae do not have the ability to avoid spills and may therefore suffer lethal or sublethal effects. Any oil spills reaching shallow seagrass, estuarine, or coastal marine habitats could affect fish species that use the affected areas as spawning or juvenile nursery habitat. Coastal pelagic fish and highly migratory species throughout the GOM could come into contact with surface oil, but would most likely move away from affected areas. Because of the wide dispersal of early life history stages of fishes in the GOM surface waters, it is anticipated that only a relatively small proportion of early life stages present at a given time would be impacted by a particular oil spill, which would limit the potential for population-level effects. However, the impact magnitude would also depend on the temporal and spatial scope of the oil spill. Since some species of fish spawn in a limited geographic area(s) during a small temporal window, a spill could have population-level impacts if the spill coincided in time and space with spawning activity. In addition, fish species such as tuna, swordfish, and billfish that currently have depressed populations and important spawning grounds in the GOM could experience population-level impacts if high numbers of early life stages were killed by a spill. The potential impacts of oil spills on fish communities are discussed in detail in Section 4.4.7.3.1.

Threatened or Endangered Species. Routine activities such as placement and removal of structures, discharges of operational wastes, and accidental spills of oil have the potential to physically harm or disturb individual Gulf sturgeon, smalltooth sawfish, or their respective habitats; cause sedimentation of areas that provide food; or elicit lethal or sublethal toxic effects. As described in Section 3.8.4.1.4, most routine activities would not take place in shallow nearshore habitat preferred by Gulf sturgeon. Gulf sturgeon are also not likely to be directly affected by routine operations that impact estuarine areas because the more vulnerable egg and larval stages are not present in estuarine areas and juveniles and adults will be able to avoid most disturbances. Consequently, it is anticipated that effects on Gulf sturgeon from routine OCS activities would be limited. Smalltooth sawfish are primarily found in peninsular Florida away from the Central and Western Planning Areas. Vulnerable early life stages of smalltooth sawfish exist only in shallow estuarine areas far removed from most routine OCS activities. Adults and larger juveniles do occupy coastal waters where OCS activities would occur. However, it is expected that, given their size, they will be able to avoid direct impacts from routine operations, although their habitat would be disturbed.

In addition to potential effects from OCS oil and gas activities identified above, Gulf sturgeon and smalltooth sawfish could be affected by non-OCS activities such as commercial fishing, water quality degradation, coastal and upland development, dredge and fill activities, and damming of major spawning rivers (Section 3.8.4.1.4). Even though it is illegal to fish for Gulf sturgeon or smallthooth sawfish, some individuals, particularly smalltooth sawfish, may be harmed or killed when captured as bycatch during trawling activities. Dredging and fill activities in estuaries may disturb smalltooth sawfish and Gulf sturgeon habitat. Increased barriers (e.g., locks or dams) to major spawning sites may result in Gulf sturgeon reproducing in less desirable locations. The eggs and fry of Gulf sturgeon are also susceptible to other fish and invertebrate predators as well as anthropogenic effects, such as artificially increased water

temperatures due to the release of cooling water from power plants and exposure to pesticides and heavy metals.

Other events, including hurricanes, turbidity plumes, and hypoxia, could also affect Gulf sturgeon, smalltooth sawfish, or their habitat. Regardless, a severe event could cause localized damage to important habitat areas and could result in the introduction of contaminants via surfacewater runoff. Therefore, such events could affect individual Gulf sturgeon or population levels for some period of time.

Oil is released in GOM waters by accidental oil spills (OCS and non-OCS) and natural seepage, primarily in deep water. Non-OCS oil and gas exploration and production activities in GOM State waters occur primarily off Louisiana and Texas, and off Alabama in the vicinity of Mobile Bay. The States of Florida and Mississippi have had limited activities in State waters, with a moratorium on drilling activity now in effect in Florida waters. Non-OCS spills in the GOM could have impacts similar to those for OCS spills. Smalltooth sawfish are primarily found in peninsular Florida and are uncommon in most of the Central and Western GOM Planning Areas. Therefore, oil spills in the GOM have the greatest potential to impact Gulf sturgeon populations. Most spills would be minor and are unlikely to reach estuarine and shelf habitat of adult sturgeon. Spills in shallow areas have the greatest potential to affect Gulf sturgeon. As identified in Section 3.8.4.1, eggs and larvae of Gulf sturgeon are typically located in freshwater areas, and oil from OCS-related spills are unlikely to come into contact with these life stages. Because adult sturgeons are benthic feeders, they are relatively unlikely to come into contact with surface oil in deeper waters.

Conclusion. Cumulative impacts on fish communities in the GOM Planning Areas could result from OCS and non-OCS activities. Overall, routine activities represent up to a minor disturbance, primarily affecting demersal fishes, with the severity of the impacts generally decreasing dramatically with distance from bottom-disturbing activities. In addition to routine OCS activities, non-OCS actions including oil and gas development in State waters, sand mining, sediment dredging and disposal, LGN facilities, hypoxia, anchoring, fishing/trawling, commercial shipping, and pollutant inputs from point and non-point sources could also adversely affect invertebrate populations. Many of these activities would affect bottom-dwelling fish at various life stages as well as their food sources in a manner similar to OCS bottom-disturbing activities. Fish could also be affected by the environmental changes predicted to result from climate change. The proposed action is expected to contribute only a small increment (impacts ranging from negligible to minor) to the potential for overall cumulative effects on fish resources because of existing regulations, the limited time frame over which most individual activities would occur, and the small proportion of available habitats that would be affected during a given period (see Section 4.4.7.3.1). Therefore, it is anticipated that the cumulative effects of OCS and non-OCS activities on fish species in the GOM Planning Areas would be similar to the effects of non-OCS activities alone.

The magnitude and severity of potential effects to fish resources from oil spills would be a function of the location, timing, duration, and size of spills; the proximity of spills to particular fish habitats; and the timing and nature of spill containment and cleanup activities. Small spills, whether from OCS or non-OCS sources, are unlikely to have overall population-level effects on

fish resources. However, oil from catastrophic spills that contacted shallow nearshore areas of these planning areas has the potential to be of greatest significance to fish communities. Such spills could result in long-term, population-level impacts on fish communities.

Although Gulf sturgeon may be affected by a variety of OCS and non-OCS activities, most OCS activities occur in deeper areas that are outside of the normal habitat areas used by Gulf sturgeon. Similarly, smalltooth sawfish are primarily found in peninsular Florida away from the Central and Western Planning Areas. Consequently, it is anticipated that the cumulative effects of OCS and non-OCS activities on Gulf sturgeon and smalltooth sawfish would be similar to the effects of non-OCS activities alone, and the proposed action is expected to contribute little to any overall incremental impacts on these species.

4.6.4.1.4 Reptiles. Section 4.4.7.4 discusses impacts on reptiles in the GOM coastal environment resulting from the proposed action. Cumulative impacts result from the incremental impacts of the proposed action when added to impacts from existing and reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities. Table 4.6.1-1 presents the exploration and development scenario for the GOM cumulative case (encompassing the proposed action and other OCS program activities). Non-OCS program activities contributing to adverse cumulative impacts on reptiles include activities associated with offshore construction (e.g., seismic surveys, dredging and marine disposal, extraction of nonenergy minerals, State oil and gas development, domestic transportation of oil and gas, and foreign crude oil imports), onshore construction (e.g., coastal and community development), the discharge of municipal and other waste effluents, and vessel traffic (e.g., commercial shipping, recreational boating, and military training and testing activities).

Ongoing and future routine OCS program activities include seismic surveys, onshore and offshore construction (including pipeline trenching and removal of offshore structures), the discharge of operational wastes (such as produced water and ship wastes), and vessel traffic. All these activities have the potential to adversely affect reptiles in the GOM via physical injury or death, lethal or sublethal toxic effects, or loss of reproductive, nursery, and feeding habitats (Section 4.4.7.4). Accidental oil spills are also counted among OCS program-related activities; assumptions for oil spills under the cumulative case scenario are provided in Table 4.6.1-3.

Anthropogenic mortality in sea turtles has been attributed to a number of sources (NRC 1990; NOAA 2003). Human activities responsible for mortality of sea turtle eggs and hatchlings include (in descending order of relative importance) beach development, beach lighting, beach use, entanglement in trash and debris, and beach replenishment. Each of these activities is associated, either exclusively or to a large degree, with coastal development. In addition, the contributions of exposure of eggs and hatchlings to toxins and of the ingestion of plastics and debris by hatchlings are unknown (NRC 1990; NOAA 2003). Human activities responsible for mortality of juvenile and adult turtles include shrimp trawling and other fisheries, beach lighting, beach use, vessel collisions, dredging, entanglement, power plant entrainment, and oil platform removal (NRC 1999; NOAA 2003). The role of exposure to toxins in overall

sea turtle mortality is unknown. However, this information is not necessary to make a reasoned choice among the alternatives.

Non-OCS offshore (deepwater and nearshore) construction activities in the GOM that could affect sea turtles include channel construction and maintenance activities (e.g., dredging) conducted by Federal, State, and local governments and the public; the offshore extraction of nonenergy minerals; State oil and gas development; and the transport of domestic and foreign oil and gas (requiring loading and offloading facilities). Potential impacts on sea turtles from these activities may include physical injury or death of individuals present in the immediate construction area. In addition, construction or removal of offshore OCS facilities may result in a relatively small incremental increase in the potential for adverse impacts on sea turtles within the GOM planning areas. However, the mitigation measures established by BOEMRE for construction and platform removal activities may be expected to reduce the contribution of these proposed activities to cumulative impacts to sea turtles from all offshore construction activities throughout the GOM planning areas (MMS 2003, 2004, 2005).

Onshore construction in coastal areas can impact sea turtle nesting habitat. Coastal development is an ongoing activity throughout the GOM and may be expected to continue or increase for the foreseeable future. Residential (i.e., housing developments) and commercial (i.e., casinos) development near nesting beaches may disrupt nesting adults and disorient emerging hatchlings, while increasing the potential for recreational human activities on nesting beaches. Compliance with regulatory requirements and the implementation of appropriate mitigation measures may be expected to reduce the potential for the siting, construction, and operation of onshore facilities.

There are a number of types of facilities or activities that discharge wastes to GOM waters and thus expose sea turtles to potentially toxic materials or solid debris that could entangle or be ingested by sea turtles. These facilities or activities include sewage treatment plants, industrial manufacturing or processing facilities, electric generating plants, cargo and tanker shipping, cruise ships, commercial fishing, pleasure craft, and vessel traffic associated with the Program. In addition, the Mississippi River (and to a lesser extent other rivers and streams that discharge to the northern GOM) annually discharges waters containing suspended sediments, agricultural fertilizers and herbicides, and urban runoff (Rabalais et al. 2001, 2002). The exposure of sea turtles to these discharges may result in physical injury or death, or a variety of lethal or sublethal toxic effects on adults, juveniles, and hatchlings. These discharges may also affect habitat quality in the vicinity of the discharges.

Operational discharges and wastes associated with OCS activities could adversely affect sea turtles, especially those in the immediate vicinity of discharging platforms and vessels (Section 4.4.7.4). However, discharges from OCS program-related vessels and platforms would be strongly regulated under the proposed action (as they are for current OCS program-related discharges). Thus, the potential for sea turtles to be exposed to discharges under the proposed action may be expected to be much less than the potential of exposure to many of the nonpoint and non-OCS related discharge sources. Similarly, because of existing USCG and USEPA regulations, the nature of the OCS discharges that could occur are expected to be less toxic or less likely to cause entanglement than discharges from non-OCS program sources.

The GOM is one of the world's most concentrated shipping areas, with extensive commercial traffic transporting a variety of materials ranging from agricultural products to domestic and foreign oil (USACE 2003a). For example, in 2003, the Port of New Orleans handled over 255,000 domestic and foreign container vessels, while the port at Gulfport, Mississippi, handled more than 161,000 foreign container vessels (USACE 2003b). The GOM also supports extensive commercial fisheries as well as recreational boating. For example, there were 2 million recreational watercraft between 4 and 20 m (12 and 64 ft) in length registered in the GOM States, many of which are used in GOM waters (USCG undated). The GOM also supports training by U.S. Navy vessels as well as routine USCG activities. Because of the very large number of vessels typically present in the GOM, the potential for sea turtles colliding with watercraft is high, and may be expected to continue and increase into the foreseeable future. In comparison with the overall level of vessel traffic in the GOM, the additional numbers of vessel trips that would occur to support OCS program activities is expected to result in a minor incremental increase to the overall potential for sea turtle–vessel collisions in the GOM planning areas.

The information on the extent to which sea turtles may be affected by noise is very limited (Section 4.4.7.4). However, this information is not necessary to make a reasoned choice among the alternatives Current noise generating activities in the GOM unrelated to OCS activities or the proposed action include the construction of offshore structures (such as those supporting State oil and gas development or nonenergy minerals extraction), dredging, commercial and recreational vessel traffic, and military training and testing activities. These may be expected to continue or increase in the foreseeable future.

Sea turtles could be exposed to OCS oil spills that could occur from platform, pipeline, and/or vessel accidents (see Section 4.4.7.4). Most spills associated with the proposed action would be relatively small (less than 50 bbl), and most would be expected to occur in water depths of 300 m (984 ft) or more (BOEMRE 2011).

Storms, operator error, and mechanical failures may result in accidental oil releases from a variety of non-OCS related activities, such as the domestic transportation of oil, the import of foreign crude oil, and State development of oil. Crude oil may also enter the environment of the northern GOM from naturally occurring seeps. At least 63 seeps have been identified in the northern GOM (mostly off the coast of Louisiana) (MacDonald et al. 1996), and more than 350 naturally occurring and constant oil seeps that produce perennial slicks of oil at consistent locations may be present in the GOM (MacDonald and Leifer [2002], as cited in Kvenvolden and Cooper [2003]). Seeps in the northern GOM have been estimated to discharge more than 1.2 million gal of crude oil annually to overlying GOM waters (MacDonald 1998). Using remotely sensed satellite data, Mitchell et al. (1999) identified approximately 1,000 km^2 (390 mi^2) of floating oil in the northern GOM, presumably from natural seeps.

Accidental oil releases from these activities and from naturally occurring seeps could impact reptiles by oiling (fouling) nesting beaches and nest sites and hatchlings, and through the inhalation or ingestion of oil or tar deposits. The magnitude and severity of potential effects on reptiles from such exposure will be a function of the location, timing, duration, and size of the

spill; the proximity of the spill to nesting beaches and feeding habitats; and the timing and nature of spill containment and cleanup activities. Depending on their location, as well as the location of spills from other sources and releases from natural seeps, accidental spills associated with the proposed action could contribute to the overall exposure of nest beaches, eggs, and hatchlings to oil, and subsequent lethal and sublethal effects, in the GOM planning areas. For example, American crocodiles in southern Florida might only be affected by natural seepage and accidental releases of oil in the Eastern Planning Area or from catastrophic spills in the Central and Western Planning Areas.

Reptile populations throughout the GOM may be adversely affected by climate change or hurricane events. As previously discussed (Section 4.4.7.4), there is growing evidence that climate change is occurring, and potential effects in the GOM may include a change (i.e., rise) in sea level or a change in water temperatures. Climate change could affect the availability or quality of nesting beaches, the location and duration of current convergence areas utilized by hatchlings in the open waters of the GOM, and the distribution, availability, and quality of feeding habitats. For reptiles that rely on temperature to determine the gender of offspring in incubating eggs (referred to as temperature-dependent sex determination), including sea turtles and crocodilians, subtle increases in atmospheric temperatures could skew sex ratios of hatchlings, which could have future population implications (Walther et al. 2002).

Severe storm events such as hurricanes have the potential to impact nesting beaches if they result in a change in beach topography or in the composition of beach materials. Heightened wave action and intensity could erode nesting beach sites, storm surges could flood beaches and drown eggs and hatchlings, and sediments deposited onto beach surfaces by storm waves may alter the thermal and structural environment of nest sites, potentially decreasing the availability and/or quality of the nesting areas (Milton et al. 1994; Hays et al. 2001; Holloman and Godfrey 2005). Hurricanes Katrina and Rita adversely affected sea turtle habitats in 2005. Approximately 50 Kemp's ridley sea turtle nesting sites were destroyed along the Alabama coast (Congressional Research Service 2005; FWS 2006). The loss of beaches through the affected coastal areas has probably affected other existing nests and nesting habitats of this species, as well as the loggerhead turtle. Similarly, impacts on seagrass beds may affect the local distribution and abundance of species that use these habitats, such as the green sea turtle and Kemp's ridley sea turtle. Although hurricanes are annual events that are an inherent component of the overall GOM ecosystem, including sea turtle nesting beaches, if hurricanes similar in magnitude to Katrina and Rita occur during the life of the Program, population-level impacts on reptiles could occur, particularly since the availability of nesting habitat (e.g. beaches) has become limited because of coastal residential and commercial development.

Conclusion. Impacts on reptiles may occur in the future as a result of normal activities related to the proposed action, as a result of activities related to ongoing and expected OCS leasing, and as a result of non-OCS program activities. The potential impacts associated with normal OCS operations represent a relatively small incremental increase in the impacts incurred by reptiles from non-OCS program activities in the GOM (see Section 4.4.7.4). Accidental oil spills under the proposed action would result in a comparatively small incremental increase in the overall impact of exposure to oil from other anthropogenic activities (such as spills from

foreign tankers). Additional impacts on reptiles may occur as a result of habitat loss or alteration due to climate change and hurricanes, and from exposure to oil from naturally occurring seeps.

4.6.4.1.5 Invertebrates and Lower Trophic Levels. Cumulative impacts could result from the combination of the proposed action and past present and reasonably foreseeable future OCS and non-OCS activities. Routine activities will cumulatively have varied effects on invertebrate populations in the sediment and water column depending on their habitat and life history. Impacts resulting from ongoing and future routine OCS program activities, including those of the proposed action, could result primarily from noise (vessel, seismic surveys, and construction), well drilling, pipeline placement (trenching, landfalls, and construction), platform placement (anchoring, mooring, and removal, except in deep waters) and routine discharges (drilling, production, platform, and vessel). Accidental oil spills are also counted among OCS program-related activities.

Routine activities that temporarily disturb sediments and increase turbidity include installation of new pipelines and platforms and discharges of drill cuttings and associated fluids. Under the cumulative scenario, as much as 55,450 ha (137,020 ac) of sea bottom would be disturbed by construction of platforms and pipelines over the period of the Program (Table 4.6.1-1). Bottom-disturbing impacts would most directly affect benthic and near bottom invertebrates. The impacts of routine activities (exploration and site development, production and decommissioning) on invertebrate communities are discussed in detail in Section 4.4.7.5.1. Overall, routine activities represent up to a moderate disturbance, with the severity of the impacts generally decreasing dramatically with distance from bottom-disturbing activities.

The addition of up to 2,100 new platforms over the life of the Program (up to 450 new platforms under the proposed action) would allow the colonization of invertebrates requiring hard substrate. While many platforms may be allowed to remain as artificial reefs, removal of platforms will reduce available substrate and structures for invertebrates and injure or kill them during removal.

Non-OCS actions may negatively influence invertebrate resources in various life stages and habitats. Non-OCS oil and gas exploration and production activities in GOM State waters occur primarily off Louisiana and Texas, and off Alabama in the vicinity of Mobile Bay. The States of Florida and Mississippi have had limited activities in State waters, with a moratorium on drilling activity now in effect in Florida waters. The increasing presence of offshore LNG facilities could lead to impacts associated with discharges of water used in the vaporization process. In addition to the thermal discharge, biocides are also discharged from the facilities. Other non-OCS activities that could impact invertebrate communities include non-OCS activities with a potential to impact marine benthic and pelagic habitats, such as sand mining, sediment dredging and disposal, anchoring, fishing/trawling, offshore marine transportation, and pollutant inputs from point and non-point sources. Many of these activities would affect bottom-dwelling invertebrates at various life stages as well as their food sources in a manner similar to OCS bottom-disturbing activities (Section 4.4.7.5.1).

The eutrophication that has contributed to the hypoxic zone in the GOM will continue to act as a source of lethal and sublethal stress to invertebrate communities. Natural events, including hurricanes and turbidity plumes, could also cause localized damage to important habitat areas and could affect individuals or populations, although the invertebrate community as a whole should be adapted to such natural events.

Commercial fishing practices that are indiscriminate, such as some types of trawling and pots, are responsible for significant amounts of bycatch that can injure or kill large numbers of invertebrates. Bottom trawling also degrades benthic habitats and temporarily increases the turbidity of the water, both of which represent chronic disturbances to invertebrates. Bottom trawling is particularly common in the GOM because of the importance of the shrimp fishery.

Several major classes of invertebrates could be affected by the environmental changes predicted to result from climate change. Climate change could affect invertebrate communities through direct physiological action, habitat loss, and by altering large-scale oceanographic and ecosystem processes (Section 3.8.5.1). A significant loss of habitat-forming invertebrates like corals could result from increased water temperature and ocean acidification. The impacts of climate change on habitat-forming invertebrates are discussed in detail in Section 3.7.2.1. Potential impacts on benthic and water column invertebrates resulting from climate change include:

- An increase in the range and temporal variability of a water column's oxygen, salinity, and temperature, which could significantly alter the existing invertebrate community structure, particularly in nearshore areas;
- A reduction in important estuarine habitats from sea level rise;
- A range expansion of new invertebrate species into the GOM;
- An increase in the extent and duration of the GOM hypoxic zone that could kill or displace existing invertebrate communities and reduce the amount of suitable habitat available; and
- Reduced oceanic pH, which could reduce the fitness of calcifying marine organisms like corals, echinoderms, foraminiferans, and mollusks.

Oil spills resulting from both OCS and non-OCS activities could impact invertebrate communities in the GOM. See Table 4.6.1-3 for anticipated oil spills over the life of the Program. Crude oil also enters the environment from naturally occurring seeps. Spills could occur from tankers carrying imported oil in the GOM. The potential effects of spills from non-OCS activities would be similar to those described for OCS activities (Section 4.4.7.5.1). In general, larger benthic and water column invertebrates that come into contact with oil would most likely move away from affected areas, while zooplankton and sessile or small infauna would not be able to avoid spills. Oil contacting invertebrates could have lethal or sublethal impacts. Any oil spills reaching shallow seagrass, estuarine, or coastal marine habitats could affect commercially important species such as shrimp, oysters, and blue crab that use these areas

as spawning or juvenile nursery habitat. If they were to occur, deepwater surface spills could also affect invertebrate eggs and larvae, neuston communities such as jellyfish species, and *Sargassum*, together with any associated vertebrate and its invertebrate organisms. Because of the wide dispersal of invertebrates in the GOM surface waters, it is anticipated that only a relatively small proportion of early life stages present at a given time would be impacted by a particular oil spill event, which would limit the potential for population-level effects. The potential impacts of oil spills on invertebrate communities are discussed in Section 4.4.7.5.1.

Conclusion. Cumulative impacts on invertebrate communities in the GOM Planning Areas could result from OCS and non-OCS activities. Overall, routine activities represent up to a moderate disturbance, with the severity of the impacts generally decreasing dramatically with distance from bottom-disturbing activities. In addition to routine OCS activities, non-OCS actions including offshore LNG facilities, sand mining, sediment dredging and disposal, hypoxia, anchoring, fishing/trawling, offshore marine transportation, and pollutant inputs from point and non-point sources could also adversely affect invertebrate populations. Many of these activities would affect bottom-dwelling invertebrates at various life stages as well as their food sources in a manner similar to OCS bottom-disturbing activities. Several major classes of invertebrates could also be affected by the environmental changes predicted to result from climate change. It is anticipated that the cumulative effects of OCS and non-OCS activities on invertebrates would be similar to the effects of non-OCS activities alone, and routine Program activities, with impacts ranging from negligible to minor, are expected to contribute only a small increment to the potential for overall cumulative effects on invertebrate resources.

The magnitude and severity of potential effects to invertebrate resources from oil spills would be a function of the location, timing, duration, and size of spills; the proximity of spills to particular habitats; and the timing and nature of spill containment and cleanup activities. Spills in deeper water, whether from OCS or non-OCS sources, are unlikely to have overall population-level effects on invertebrate resources because of the relatively small proportion of similar available habitats that would come in contact with released oil at concentrations great enough to elicit toxic effects. Oil from catastrophic spills that reaches shallower, nearshore areas of these planning areas has the potential to be of greatest significance to invertebrate communities. Impacts from such spills could result in long-term, population level impacts on invertebrate communities.

4.6.4.1.6 Areas of Special Concern. Section 4.4.8.1 identified potential effects of the proposed action on areas of special concern in the GOM. This section identifies activities that could affect such areas in the GOM, including non-OCS activities and current and planned OCS activities that would occur during the life of the Program, and the potential incremental effects of implementing the proposed action.

National Marine Sanctuaries. The FGBNMS is the only National Marine Sanctuary located in the Western and Central GOM Planning Areas. The Flower Gardens Bank sanctuary is protected from direct mechanical damage due to oil and gas exploration and development by an MMS Topographic Features Stipulation, which includes a No Activity Zone (Section 4.4.6.2). Additional OCS activities that could affect the marine sanctuaries include discharges of drilling

cuttings, drilling muds, and produced waters. However, as identified in Section 4.4.6.2, the Topographic Features Stipulation does not allow discharges from OCS activities to be released within the vicinity of the FGBNMS. Consequently, it is anticipated that the sanctuary would not be affected by discharges from OCS activities.

Non-OCS activities that could affect the marine sanctuaries include fishing, diving, offshore marine transportation, and tankering. Natural events such as hurricanes could also impact the sanctuaries. Fishing and diving impacts are controlled by sanctuary guidelines regulating these activities. The distance of the Flower Garden Banks from shore (over 160 km [99 mi]) serves to reduce the number of visitors to the sanctuary, further reducing the potential for impacts from fishing and diving activities. Sanctuary regulations also prohibit collecting activities and ban anchoring within the sanctuary in order to minimize structural damage to the reef system from commercial and recreational vessels.

Climate change has the potential to profoundly affect coral communities on topographic features in several ways, including:

- Increased frequency of bleaching as a stress response to warming water temperatures (Hoegh-Guldberg et al. 2007);
- Excessive algal growth on reefs and an increase in bacterial, fungal, and viral agents (Boesch et al. 2000; Twilley et al. 2001);
- Greater frequency of mechanical damage to corals from greater severity of tropical storms and hurricanes (Janetos et al. 2008);
- Decreases in the oceanic pH and carbonate concentration are expected to reduce the reef formation rate, weaken the existing reef structure, and alter the composition of coral communities (Janetos et al. 2008); and
- Invasive species may expand their range into the GOM due to climate change.

Impacts on the marine sanctuaries could occur due to surface hydrocarbon discharges from platform spills, OCS and non-OCS tankers, or other marine traffic passing in the vicinity of the sanctuary. Discharges in the vicinity of the FGBNMS should be greatly diluted before they could reach reef features because water depths within the sanctuary are greater than 20 m (66 ft). Consequently, it is anticipated that concentrations of contaminants within such discharges would be diluted to levels unlikely to have toxic effects on reef organisms. Oil spills could also impact the Flower Garden Banks communities. The No Activity Zone mandated in the Topographic Features Stipulation and adopted as a regulation for the Flower Garden Banks precludes placement of platforms or pipelines immediately adjacent to the marine sanctuary and reduces the likelihood that oil from a pipeline leak would reach bank communities. If oil from a series of subsurface spills were to reach one of these banks, sensitive biota could be affected. Potential impacts have been discussed in Section 4.4.6.2. It is anticipated that impacts of a large oil spill reaching coral reef or hard-bottom habitat may be long term.

National Parks, Reserves, and Refuges. As identified in Section 4.4.8.1, routine OCS activities potentially affecting parks, reserves, and refuges include placement of structures, pipeline landfalls, operational discharges and wastes, and vessel and aircraft traffic. It is assumed that pipeline landfalls, shore bases, and waste facilities would not be located in national parks, NWRs, or national estuarine research reserves because of the special status and protections afforded these areas. Consequently, there would be no direct impacts from these activities on any GOM national parks, reserves, or refuges.

It is possible that future pipeline landfalls, shore bases, and waste facilities could be located in one or more estuaries in the Western or Central GOM Planning Areas that are included in the National Estuary Program. This includes Corpus Christi Bay (Coastal Bend Bays and Estuaries), Galveston Bay, Barataria-Terrebonne Estuarine Complex, and Mobile Bay. Under the cumulative scenario, it is anticipated that less than 40 new pipeline landfalls could occur in the GOM, with less than 12 of these resulting from the proposed action (Table 4.4.1-1). In addition, gas-processing facilities could be built in the GOM area under the cumulative scenario. It is assumed that new onshore facilities and structures would be subject to additional evaluations under the NEPA and that they would be sited to avoid national parks, reserves, and refuges and to limit impacts on estuarine and coastal habitats.

Trash and debris are a recognized problem affecting enjoyment and maintenance of recreational beaches along the GOM coast. From extensive aerial surveys conducted by NMFS over large areas of the GOM, floating offshore trash and debris was characterized by Lecke-Mitchell and Mullin (1997) as a ubiquitous, Gulfwide problem. Not surprisingly, such trash and debris frequently washes up on beaches, including those associated with areas of special concern such as the Padre Island National Seashore. Trash and debris can detract from the aesthetic quality of beaches, can be hazardous to beach users and wildlife, and can increase the cost of maintenance programs.

Trash and debris in the GOM originates from various sources, including OCS operations, offshore and onshore oil and gas operations in State waters, naval operations; merchant vessels, commercial and recreational fishing activities, and onshore residences and businesses (Miller and Echols 1996). The discharge or disposal of solid debris from OCS structures and vessels is prohibited by the MMS (30 CFR 250.40) and by the USCG (MARPOL, Annex V, Public Law 100-220 [101 Statute 1458]). Assuming that operators of OCS facilities comply with regulations, most potential impacts would be avoided, although some accidental loss of materials is inevitable. Natural phenomena (such as storms, hurricanes, and river outflows) contribute to movement of trash and debris onto the beaches in the GOM.

Vessel wakes from a large number of vessel trips can, over time, erode shorelines along inlets, channels, and harbors. The GOM is one of the world's most concentrated shipping areas, and the Port of New Orleans supports extensive commercial shipping traffic. The GOM also supports extensive commercial fisheries as well as recreational boating. The GOM also supports training by U.S. Navy vessels as well as routine USCG activities (Section 4.3). The additional vessel activity that would occur under the proposed action will result in an increase in the overall potential for wakes to affect sensitive shorelines in the GOM OCS Planning Areas.

Overall, it is assumed that there could be 1,400–1,900 OCS-related vessel trips per week in the GOM under the cumulative scenario; 300 to 600 of these would occur as a result of OCS activities attributable to the proposed action (Table 4.4.1.1-1). The majority of such vessel trips would occur in offshore waters, thereby precluding effects on shorelines associated with national parks, reserves, and refuges. Existing regulations typically limit vessel speeds in the sensitive inland waterways of areas of special concern. With these measures in place, most impacts due to vessel traffic in such areas would be avoided.

Under the proposed action, national parks, NWRs, national estuarine research reserves, or national estuary program sites could be exposed to oil accidentally released from platforms, pipelines, and vessels (see Section 4.4.8.1). In addition to the potential for spills from OCS sources, storms, operator error, and mechanical failures could also result in accidental oil releases from a variety of non-OCS-related activities including domestic transportation of oil, importing foreign crude oil, and development of oil production under State programs. The potential exists for impacts to National Parks, Reserves, and Refuges that could result from both oiling of the shoreline and mechanical damage during the cleanup process. Most spills associated with the proposed action would be relatively small (less than 50 bbl), and most would be expected to occur in waters depths of 200 m (656 ft) or more (Table 4.4.2-1) where they are not likely to affect coastal areas. Because of the expected distribution of leasing activities, it is assumed that such spills would occur in either the Western or Central GOM Planning Areas.

Based on the expected distribution of activities and facilities associated with current or proposed activities under OCS leasing programs, it is assumed that any accidental oil spills from OCS-activities would occur in either the Western or Central GOM Planning Area. In contrast, non-OCS spills could occur anywhere in the GOM. Thus, while it is considered likely that only national seashores, NWRs, national estuarine research reserves, and National Estuary Program sites in the Western or Central GOM are at risk from spills due to ongoing or proposed OCS activities, any of these types of properties located along the GOM coast has a potential to be affected by non-OCS accidental spills. Regardless of the source, oil from a large or catastrophic spill that reached the shoreline of any of these sites could have adverse effects on resources or resource values.

Hurricanes and tropical storms occur regularly in the GOM area. The natural environments that parks and refuges preserve and maintain have developed in a setting of regular occurrences of severe storms. In 2004 and 2005, however, Hurricanes Katrina, Rita, and Ivan severely impacted numerous national parks, NWRs, and national estuaries. In 2004, Hurricane Ivan damaged 10 NWRs between the Florida panhandle and Louisiana. In 2005, Hurricane Katrina affected 16 refuges in the same area, temporarily closing all of them. Impacts included damage to beaches, dunes, vegetation and infrastructure. Breton NWR in Louisiana was reduced to about one-half its pre-Katrina size. Many impacted refuges remain impacted by huge quantities of debris and hazardous gases and liquids spread over large areas of wetlands within the sanctuaries. Should storms of similar strength and size occur during the life of the Program, long-term impacts on areas of special concern in the GOM could occur.

Conclusion. In addition to OCS activities, non-OCS activities that could affect National Sanctuaries, Parks, Reserves and Refuges include fishing, diving trash and debris, vessel wakes,

vessel traffic, tinkering, and oil and gas activities in State waters. Hurricanes and tropical storms also occur regularly in the GOM area potentially causing damage. Due to existing protections, it is anticipated that the FGBNMS would not be affected by OCS activities. Development of OCS onshore facilities within National Park lands is considered unlikely, making impacts from cumulative routine OCS operations unlikely in these areas. Offshore construction of pipelines and platforms could contribute to cumulative effects on wildlife and on scenic values for park visitors. Impacts could also include increases to the amount of trash or debris that currently washes up on shorelines, and increases in shoreline erosion due to increased vessel traffic in inshore waters. Overall, routine Program activities could result in minor incremental increases in effects on areas of special concern compared to existing non-OCS activities within the Gulf of Mexico (see Section 4.4.8.1).

The proposed action would be expected to result in a small incremental increase in the risk of impacts from oil spills to areas of special concern. The cumulative level of impacts from spills would depend on spill frequency, location, and size; the type of product spilled; weather conditions; effectiveness of cleanup operations; and other environmental conditions at the time of the spill. Large and catastrophic oil spills in areas adjacent to the National Parks, NWRs, or National Forests, whether from OCS or non-OCS sources, could negatively impact the FGBNMS and coastal habitats and fauna and could also affect subsistence uses, commercial or recreational fisheries, and tourism.

4.6.4.2 Alaska Region – Cook Inlet

4.6.4.2.1 Marine Mammals.

Marine Mammals. The cumulative analysis considers past, ongoing, and foreseeable future human and natural activities that may occur and adversely affect marine mammals in the same general area. These activities include effects of the OCS Program (proposed action and prior and future OCS sales), oil and gas activities in State waters, commercial and subsistence shipping, commercial fishing, recreational fishing and boating activities, military operations, scientific research, and natural phenomena. Specific types of impact-producing factors considered include noise from numerous sources, pollution, ingestion and entanglement in marine debris, vessel strikes, habitat degradation, subsistence harvests, military activities, industrial development, community development, climate change, and natural catastrophes. Section 4.4.7.1.2 provides the major impact-producing factors for the proposed action in Cook Inlet.

Routine Activities.

<u>OCS Activities.</u> Marine mammals and their habitats in the Cook Inlet Planning Area could be affected by a variety of exploration, development, and production activities as a result of the proposed and future OCS leasing actions (see Section 4.4.7.1.2). These activities include seismic exploration, offshore and onshore infrastructure construction, the discharge of operational wastes, and vessel and aircraft traffic. Impacts on marine mammals from these

activities may include physical injury or death; behavioral disturbances; lethal or sublethal toxic effects; and loss of reproductive, nursery, feeding, and resting habitats. The degree of impact at the population level depends greatly on the status of the population (reflected in its listing under the ESA) and the degree of disturbance or harm from OCS-related activities in areas important to species survival (i.e., feeding, breeding, molting, rookery, or haulout areas).

Potential impacts (primarily behavioral disturbance) on marine mammals from OCS-related seismic activity would be short term and temporary, and not expected to result in minor impacts on any affected species.

Impacts from OCS construction and operation activities could include the temporary disturbance and displacement of individuals or groups by construction equipment and long-term disturbance of some individuals from operational noise. No long-term, population-level effects would be expected because individuals most affected by these impacts would be those in the immediate vicinity of the construction site or operational platform and disturbance of individuals during construction would be largely temporary. In addition, appropriate mitigation measures could lessen the potential for impacts.

Operational and waste discharges (e.g., produced water, drilling muds, and drill cuttings) would be disposed of through downhole injection into NPDES-permitted disposal wells, and thus would not be expected to result in any incremental impacts on marine mammals. Liquid wastes (such as bilge water) may also be generated by OCS support vessels and on production platforms. While these wastes may be discharged (if permitted) into surface waters, they would be rapidly diluted and dispersed and would result in minor incremental impacts on marine mammals. Drilling and production wastes may contain materials such as metals and hydrocarbons, which can bioaccumulate through the food chain into the tissues of marine mammals. Although the bioaccumulation of anthropogenic chemicals has been reported for a variety of marine mammals, adverse impacts or population-level effects resulting from such bioaccumulation have not been demonstrated (Norstrom and Muir 1994; Muir et al. 1999).

Marine mammals could be temporarily disturbed by OCS vessel traffic (all species) or incur injury or death from collisions with support vessels (primarily larger, slower moving cetaceans). The low level of expected OCS vessel trips in the Cook Inlet Planning Area under the proposed action (one to three trips per week) would be a minor contribution to all vessel traffic occurring in the Cook Inlet. Noise from the one to three helicopter overflights expected each week would be transient in nature and be a minor component of all aircraft flights that occur within Cook Inlet. Overflights disturbing active rookery sites could result in decreased pup survival and in population-level impacts on some species, although overflight restrictions and flightline selection to avoid rookeries would greatly limit the potential for adversely affecting animals at these locations.

No platforms would be removed under the proposed action for the Cook Inlet Planning Area. It is possible that platforms would be removed from future lease sales or from platforms associated with oil and gas activities in State waters. There have been no documented losses of marine mammals resulting from explosive removals of offshore oil and gas structures, but there are sporadic incidents reported of marine mammals being killed by underwater detonations

(Continental Shelf Associates 2004; MMS 2007, 2008). Harassment of marine mammals as a result of a non-injurious physiological response to the explosion-generated shock wave, as well as to the acoustic signature of the detonation, is also possible. However, explosive platform removals would comply with appropriate BOEM or State guidelines and would not be expected to adversely affect marine mammals in Cook Inlet.

Non-OCS Activities. A number of non-OCS activities such as oil and gas exploration and development in State waters: commercial, subsistence, and recreational fishing; vessel traffic; and climate change could also affect marine mammals in the Cook Inlet Planning Area (or portions of the Gulf of Alaska that could be affected by activities in Cook Inlet). Many of the effects of these activities on marine mammals would be similar in nature to those resulting from OCS-related activities, namely, behavioral disturbance, habitat disturbance, injury or mortality, and exposure to toxic substances. Marine mammals may also be adversely affected by climate change.

Oil and Gas Exploration and Development in State Waters. The State of Alaska has made nearshore State lands available for leasing along the northern portion of Cook Inlet (above Homer). Exploration, construction, and operation activities associated with State leases would occur in nearshore and coastal areas, while OCS platforms and pipelines would be located away from coastal areas. Thus, State oil and gas leasing activities may be expected to have a greater potential for affecting marine mammals in coastal habitats than would the proposed OCS actions.

Commercial and Subsistence Fishing and Harvesting. Commercial and subsistence fishing has been identified as impacting many of the marine mammals in Alaskan waters (Allen and Angliss 2011). These fisheries employ a variety of methods, such as longlines, seines, trawls, and traps, and can result in the entanglement, injury, and death of individuals of marine mammal species. Fisheries also remove a portion of the prey base for some marine mammals. Subsistence harvest has targeted and continues to target some marine mammal species, especially some of the whale species.

The following are minimum reported estimated annual mortality rates incidental to commercial fisheries and subsistence harvests for marine mammals that occur in Cook Inlet and/or in the Gulf of Alaska that could be affected by the proposed action in Cook Inlet (Allen and Angliss 2011):

- The estimated minimum mortality rate for Western U.S. Stock of the Steller sea lion incidental to Alaska commercial fisheries is 26.2 animals per year. The best estimate of annual subsistence harvest of the Steller sea lion is 197 animals.

- The estimated minimum mortality rate for Eastern Pacific Stock of the northern fur sea lion incidental to Alaska commercial fisheries is 1.9 animals per year. The best estimate of annual subsistence harvest of the northern fur seal is 562 animals.

- The estimated minimum mortality rate for Gulf of Alaska Stock of the harbor seal incidental to Alaska commercial fisheries is 24 animals per year. The best estimate of annual subsistence harvest of the harbor seal is 807 animals.

- There are no reports of mortality incidental to commercial fisheries for the Cook Inlet Stock of the beluga whale. Annual subsistence harvest of Cook Inlet beluga whales ranged from 30 to over 100 between 1993 and 1999. Since 2000, subsistence harvests totaled only 11 whales, with no subsistence harvests allowed between 2008 and 2012 (Allen and Angliss 2011; NMFS 2008b).

- The estimated minimum mortality rate for the Alaska Resident Stock of the killer whale incidental to Alaska commercial fisheries is 1.2 animals per year. There are no reports of subsistence harvests of killer whales in Alaska.

- The estimated minimum mortality rate for the Gulf of Alaska, Aleutian Islands, and Bering Sea Transient Stock of the killer whale incidental to Alaska commercial fisheries is 0.4 animal per year. There are no reports of subsistence harvests of killer whales in Alaska.

- There are no reports of mortality incidental to commercial fisheries or subsidence harvest for the ATI Transient Stock of the killer whale.

- There were no serious injuries or mortalities observed or reported incidental to commercial fisheries between 2002 and 2006 for the North Pacific Stock of the Pacific white-sided dolphin. However, between 1978 and 1991, thousands of individuals died annually incidental to high seas fisheries (these fisheries have not operated in the central North Pacific since 1991). There are no reports of subsistence harvests of Pacific white-sided dolphins.

- The estimated minimum mortality rate for the Gulf of Alaska Stock of the harbor porpoise incidental to commercial fisheries is 71.4 animals per year. There are no reports of subsistence harvests of the harbor porpoise. Two harbor porpoises were taken incidentally in subsistence gillnets in 1995.

- The estimated minimum mortality rate for the Alaska Stock of the Dall's porpoise incidental to commercial fisheries is 29.6 animals per year. There are no reports of subsistence harvests of the Dall's porpoise.

- The estimated minimum mortality rate for the North Pacific Stock of the sperm whale incidental to commercial fisheries in the Gulf of Alaska is 2.01 animals per year. There are no reports of subsistence harvests of the sperm whale. The sperm whale was the dominant species killed by the commercial whaling industry in the North pacific in the years following the Second World War.

- The estimated annual mortality rate for the Alaska Stock of Cuvier's beaked whale incidental to commercial fisheries is zero. There are no reports of subsistence harvests of the Cuvier's beaked whale.

- Serious injuries to or mortalities of Eastern North Pacific Stock of the gray whale occur throughout their range incidental to commercial fisheries and from strandings due to various causes. The annual mortality rate incidental to U.S. commercial fisheries is 3.3 whales. Annual subsistence take averaged 121 whales between 2003 to 2007. Russian Chukotka people take most of the gray whales. The U.S. Makah Indian Tribe has a yearly average quota of only 4 whales. In 2005, an unlawful subsistence hunt and kill of a gray whale occurred in Alaska.

- The Western North Pacific Stock of the humpback whale's feeding area includes the Gulf of Alaska. The estimated annual mortality incidental to U.S. commercial fisheries is 0.2 humpback whales per year based on one mortality observed in the Bering Sea sablefish pot fishery from 2002 through 2006. Bycatch in Japan and Korea average 1.1 to 2.4 humpback whales per year. The annual mortality rate for subsistence takes for the 2003 to 2007 period was 0.2 whales. The species received full protection in 1965; however, the Union of Soviet Socialist Republics (USSR) continued illegal catches until 1972. From 1961 through 1971, 6,793 humpback whales were illegally killed. Many of these were taken from the Gulf of Alaska and the Bering Sea.

- The Central North Pacific Stock of the humpback whale feeding area includes the Gulf of Alaska area that encompasses Cook Inlet. Based on observations from 2003 through 2007, the estimated annual mortality in Alaska is 3.4 animals per year from commercial fishery, 0.2 animals per year from recreational fishery, and 1.6 animals per year from vessel collisions. Subsistence harvesting is not allowed for humpback whales from the Central North Pacific Stock.

- There was one observed incidental mortality of a fin whale from the Northeast Pacific Stock in the Bering Sea/Aleutian Island pollock trawl fishery. No current or historical subsistence takes of this stock are reported from Alaska or Russia. Between 1925 and 1975, commercial whaling throughout the North Pacific killed 47,645 fin whales.

- For the Alaska Stock of the minke whale, the total estimated mortality and serious injury incidental to U.S. commercial fisheries for 2002 through 2006 was zero. Prior to that time, whale mortalities were very rare. Subsistence take by Alaska Natives is rare (e.g., only nine between 1930 and 1995).

- There are no records of North Pacific right whale mortalities incidental to U.S. commercial fisheries. There are no reported subsistence takes of the species in Alaska or Russia. Up to 37,000 North Pacific right whales were

killed by whaling from 1839 to 1909; while 742 were killed by whaling from 1900 to 1999, in addition to 372 killed illegally, taken by the U.S.S.R., from 1963 through 1967, primarily in the Gulf of Alaska and Bering Sea, that left the population at an estimated 50 individuals (Allen and Angiss 2011; Encyclopedia of Life 2011).

- Based on commercial fisheries observer program results, fishing mortality and serious injury for the south central Alaska Stock of the northern sea otter is insignificant (i.e., approaches zero mortalities and serious injuries). The mean annual report of subsistence take for the stock from 2002 through 2006 was 346 animals.

- The total fishery mortality and serious injury rate for the Southwest Alaska stock of the northern sea otter is less than 10 animals per year. The mean annual report of subsistence take for the stock from 2002 through 2006 was 91 animals.

In addition to the above, no serious injuries or mortalities due to fisheries or subsistence have been reported for blue whales in Alaska (Carretta et al. 2011).

Climate Change. A concern regarding marine mammals in polar regions is the potential for climate change and associated changes in the extent of sea ice in some arctic and subarctic waters. It is not possible at this time to identify the likelihood, direction, or magnitude of any changes in the environment of Cook Inlet waters due to changes in the climate, or how climate change could impact marine mammals in these waters. The current state of climate change and its impacts on marine mammals would also be further considered in any subsequent environmental reviews for lease sales or other OCS-related activities; therefore, this information is not essential to a reasoned choice among the alternatives presented in this PEIS.

Other Impacting Factors. Marine mammals in the Cook Inlet area may also be impacted by other factors such as UMEs and invasive species. A UME is an unexpected stranding that involves a significant die-off of any marine mammal population, and demands immediate response (NMFS 2011b). Since establishment of the UM program in 1991, there have been 53 formally recognized UMEs in the U.S.; only one UME occurred in Alaska and involved sea otters (NMFS 2011b). Causes have been determined for 25 of the UMEs, and include infections, biotoxins (particularly domoic acid and brevetoxin), human interactions, and malnutrition. The cause of the UME in Alaska is undetermined (NMFS 2011b). Invasive species could affect some marine mammals by disrupting local ecosystems and fisheries of the area of Cook Inlet. For example, introduced northern pike (*Esox lucius*) consume salmon, trout, and whitefish, affecting total populations of these prey species where pike become established. The potential introductions of other invasive species of concern, such as the Chinese mitten crab (*Eriocheir sinensis*), which could eat and/or out compete native invertebrate species, could adversely affect natural communities (McClory and Gotthardt 2008). These and other invasive species could affect the prey base for some marine mammals. As climate change continues to warm Alaskan waters, Alaska may become more susceptible to invasive species (McClory and Gotthardt 2008).

Accidents. Marine mammals could be exposed to oil accidentally released from platforms, pipelines, and vessels in each of the areas offshore Alaska included in the proposed Program (Table 4.4.2-1). Non-OCS sources of oil in Cook Inlet may include the domestic transportation of oil, State oil and gas development, and natural sources such as seeps. Accidental oil releases from OCS activities and other sources could expose marine mammals to oil by body contact or through the inhalation or ingestion of oil or tar deposits. Indirect effects may occur as a result of loss or displacement of prey resources or habitat loss resulting from oil. The magnitude and duration of exposure will be a function of the location, timing, duration, and size of the spill; the proximity of the spill to feeding and other important habitats; the timing and nature of spill containment; and the status of the affected animals.

It is anticipated that most of the small to medium spills would have limited effects on marine mammals due to the relatively small areas likely to incur high concentrations of hydrocarbons and the short period of time during which potentially toxic concentrations would be present. The magnitude of impact would be expected to increase should a spill occur in habitats important to marine mammals or affect a number of individuals from a population listed under the ESA, and, as such, a significant spill would have a high probability of producing significant, population-level cumulative impacts on Cook Inlet beluga whales.

Conclusion. Cumulative impacts on marine mammals in the Cook Inlet Planning Area as a result of future OCS program and ongoing and future non-OCS program activities could be minor to moderate over the next 40 to 50 yr. Non-OCS program activities or phenomena include climate change, natural catastrophes, contaminant releases, vessel traffic, commercial fishing, subsistence harvests, and invasive species. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.7.1.2).

Marine mammals may also be adversely affected by exposure to oil that is accidentally released from OCS and non-OCS activities as well as naturally occurring seeps. The cumulative impacts of past, present, and future oil spills on marine mammals would be minor to moderate. The incremental impacts of accidental spills associated with the proposed action on marine mammals would be small to large, depending on the location, timing, duration, and size of the spill; the proximity of the spill to feeding and other important habitats; the timing and nature of spill containment; and the status of the affected animals (see Section 4.4.7.1.2).

Terrestrial Mammals. Terrestrial mammals and their habitats could be affected by a variety of activities associated with the proposed OCS actions (Section 4.4.7.1.2). These activities include the construction and operation of onshore pipelines and aircraft traffic. Impacts on terrestrial mammals may include physical injury or death; behavioral disturbances; lethal or sublethal toxic effects; and loss of reproductive, nursery, feeding, and resting habitats. There are currently no ongoing OCS activities in the Cook Inlet; thus all OCS development and any associated impacts on terrestrial wildlife in the Cook Inlet Planning Area would result from the proposed action and future actions.

Impacts from OCS pipeline construction and operation could include the injury or death of smaller mammals (such as mice and voles) and the disturbance and displacement of individuals or groups of larger species (such as deer and bear). Individuals most affected by

these impacts would be those in the immediate vicinity of the pipeline. Because of the limited areal extent of new facilities under the proposed action, disturbance (primarily behavioral in nature) of most of these species during construction would be largely temporary, and no long-term population-level effects would be expected. However, careful siting of pipelines to avoid important habitats could minimize the potential impacts.

Under the proposed action, vehicle traffic associated with normal construction, operation, and maintenance of the onshore pipelines could disturb wildlife. Vehicle traffic could disturb wildlife foraging along pipelines or access roads, causing affected wildlife to temporarily stop normal activities (e.g., foraging, resting) or leave the area, while collision with vehicles could injure or kill some individuals. Because vehicle traffic would be infrequent, vehicle-related impacts associated with the proposed action would be minimal. In the Cook Inlet, vehicle traffic along any new access roads would be very light and infrequent and, thus, not expected to affect more than a few individuals or result in population-level impacts on wildlife.

In the Cook Inlet area, terrestrial mammals are mostly habituated to aircraft due to year-round military and civilian aircraft operations. Only up to three weekly helicopter trips are projected in the Cook Inlet Planning Area under the proposed action. Impacts on terrestrial mammals from helicopter overflights would be behavioral in nature, primarily resulting in short-term disturbance in normal activities, and would not result in population-level effects.

Terrestrial mammals could also be affected by a number of non-OCS activities, including oil and gas exploration and development in State waters, and coastal and community development. Many of the effects of these activities on terrestrial mammals would be similar in nature to those resulting from OCS-related activities, namely behavioral disturbance, habitat disturbance, and injury or mortality. The State of Alaska has made leases of State waters available along the northern portion of Cook Inlet (above Homer) since the 1950s. Impacts on terrestrial mammals that could result with oil and gas lease sales in State waters may exceed potential impacts that could occur under the OCS proposed action because of the greater extent of offshore and onshore development. In addition, much of the infrastructure is over 40 yr old, and many of the pipes are aging and corroded (NMFS 2008c). Terrestrial mammals may be affected as a result of coastal and community development. Such development may result in the loss of habitat and the permanent displacement of some species from the developing areas. Implementation of the proposed action could increase coastal and community development, indirectly adding to impacts on terrestrial mammals and their habitats.

Terrestrial wildlife could be adversely affected by the accidental release of oil from an onshore pipeline, or by offshore spills contacting beaches and shorelines utilized by terrestrial mammals (such as Sitka black-tailed deer or brown bear). Impacts on terrestrial mammals from an oil spill would depend on such factors as the time of year, volume of the spill, type and extent of habitat affected, food resources used by the species, and home range or density of the wildlife species. Spills contacting high-use areas could locally affect a relatively large number of animals. It is anticipated that most of the spills would have limited effects on terrestrial mammals, due to the relatively small, mostly offshore, areas likely to be directly exposed to the spills and due to the small number and size of spills projected for the proposed action and for any future OCS oil and gas developments.

State oil and gas development poses a major potential for accidental oil releases in the Cook Inlet Planning Area. Because of the much greater level of oil and gas development in State waters and the aging infrastructure associated with many of these developments, accidental spills associated with the proposed OCS action could contribute relatively little to the overall potential exposure of terrestrial mammals to accidental oil releases in Cook Inlet.

Conclusion. Cumulative impacts on terrestrial mammals in the Cook Inlet Planning Area as a result of future OCS program and ongoing and future non-OCS activities could be minor to moderate over the next 40 to 50 yr. Non-OCS activities or phenomena that may affect populations of terrestrial mammals include climate change, natural catastrophes, contaminant releases, and vehicle traffic. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.7.1.2).

Terrestrial mammals may also be adversely affected by exposure to oil that is accidentally released from OCS and non-OCS operations. The cumulative impacts of past, present, and future oil spills on terrestrial mammals would be minor to moderate. The incremental impacts of accidental spills associated with the proposed action on terrestrial mammals would be small to large, depending on the location, timing, duration, and size of the spill; the proximity of the spill to feeding and other important habitats; the timing and nature of spill containment; and the status of the affected animals (see Section 4.4.7.1.2).

4.6.4.2.2 Marine and Coastal Birds. Section 4.4.7.2.2 discusses impacts on marine and coastal birds in Cook Inlet resulting from the proposed action (OCS program activities from 2012 to 2017). Cumulative impacts on marine and coastal birds result from the incremental impacts of the proposed action when added to impacts from existing and reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities. Table 4.6.1-2 presents the exploration and development scenario for the Cook Inlet cumulative case (encompassing the proposed action and other OCS program activities) over the next 40 yr. A number of OCS program activities could affect Cook Inlet marine or terrestrial birds or their habitats; these include offshore exploration, construction of offshore platforms and pipelines, construction of onshore pipeline landfalls and pipelines, operations of offshore and onshore facilities, and OCS-related marine vessel and aircraft traffic. Potential impacts on marine and coastal birds from OCS program activities include injury or mortality from collisions with platforms, vessels, and aircraft; lethal and sublethal exposure to operational discharges; injury or mortality from the ingestion of trash or debris from OCS vessels and platforms; loss or degradation of habitat due to construction; and behavioral disturbance due to the presence of, and noise generated by, equipment and human activity.

Non-OCS program activities affecting marine and coastal birds in Cook Inlet (both inside and outside of the Planning Area proper) include dredging and marine disposal; coastal and community development; onshore and offshore construction and operations of facilities associated with State oil and gas development and other industrial complexes (e.g., at Nikiski); commercial and recreational boating; and small aircraft traffic. Potential impacts on marine and coastal birds from these activities are similar to those under the OCS program and include injury or mortality of birds from collisions with platforms associated with State oil and gas

development and other onshore and offshore structures (e.g., radio, television, or cell phone towers), onshore industrial, commercial, and residential development; exposure to discharges from permitted point sources such as sewage treatment discharges and nonpoint sources such as urban runoff, or accidental releases (e.g., oil spills), as described in Section 4.6.2.1.2 and Table 4.6.2-3; exposure to emissions from various onshore and offshore sources (e.g., power generating stations, refineries, and marine vessels), as described in Section 4.6.2.1.2; ingestion of trash or debris; loss or degradation of habitat due to construction and operations activities; and behavioral disturbance due to the presence of, and noise generated by, equipment and human activity. Other trends such as extensive melting of glaciers (and increasing river discharges) and increased precipitation brought on by global climate change are also expected to adversely affect marine and coastal birds over the next 40 yr.

Injury or Mortality from Collisions. Under the cumulative scenario, annual collision injury or mortality in Cook Inlet could increase in the near term as platforms are built under the proposed action. Such impacts would be minor relative to those that currently involve non-OCS structures. Over time, the injury or mortality impacts from collisions could decrease as oil and gas production in the inlet declines.

Exposure to Wastewater Discharges and Air Emissions. The discharge of operational wastes and air emissions from current non-OCS related vessel traffic and platform operations in Cook Inlet is strongly regulated and would continue to be so regulated over the next 40 yr. However, such wastes and emissions would still expose marine and coastal birds to potentially toxic materials or to solid debris that could be ingested or result in entanglement. These facilities and activities include sewage treatment plants, industrial manufacturing or processing facilities, electric generating plants, dredging and marine disposal, and vessel traffic (e.g., cargo and tanker ships, cruise ships, commercial fishing vessels, and recreational vessels). Operational wastewater discharges and air emissions associated with the proposed action would contribute to the overall cumulative risk of toxic exposure and debris ingestion or entanglement of existing non-OCS wastewater discharges and air emissions in the inlet, but the incremental increase in impact is expected to be small relative to these other activities.

Under the proposed action, marine and coastal birds could be exposed to oil accidentally released from platforms, pipelines, and vessels, and would be most susceptible to adverse impacts from spills occurring in coastal areas and affecting feeding and nesting areas. Most of the oil released to Cook Inlet is from commercial and recreational vessels (Section 4.6.2.2.1). Oil releases from all sources may expose marine and coastal birds via direct contact or through the inhalation or ingestion of oil or tar deposits (see Section 4.4.7.2.1).

Marine and coastal birds may become entangled in, or ingest, floating, submerged, and beached debris (Heneman and the Center for Environmental Education 1988; Ryan 1987, 1990). Entanglement may result in strangulation, injury or loss of limbs, entrapment, or the prevention or hindrance of the ability to fly or swim; all of these effects may be considered lethal. Ingestion of debris may irritate, block, or perforate the digestive tract, suppress appetite, impair digestion of food, reduce growth, or release toxic chemicals (Fry et al. 1985; Dickerman and Goelet 1987; Ryan 1988; Derraik 2002). Because the discharge or disposal of solid debris into offshore waters from OCS structures and vessels is prohibited by BOEM (30 CFR 250.40) and the USCG

(MARPOL, Annex V, Public Law 100 220 [101 Statute 1458]), entanglement in or ingestion of OCS-related trash and debris by marine and coastal birds would not be expected under normal operations.

Oil Spills and Cleanup Activities. Oil spills under the cumulative scenario are shown in Table 4.6.1-3. No more than one large spill (between 1,000 and 5,300 bbl from either a platform or a pipeline) and 18 small spills (less than 1,000 bbl) would be expected as a result of the Cook Inlet Planning Area OCS program over the next 40 yr. Previous modeling of similar-sized oil spills in Cook Inlet indicates that land segments with the highest chance of contact with an offshore platform or pipeline spill are generally along the western shore of lower Cook Inlet in Kamishak Bay and Shelikof Strait (MMS 2002b). A large number of seabird colonies occur in these areas (USGS undated) and could be affected by oil spills reaching these areas.

Nesting and brood-rearing seabirds, waterfowl, and a few shorebirds, as well as the many species of waterfowl/loons, seabirds, and shorebirds that molt, stage, migrate through, or overwinter in large numbers in south central Alaska would be vulnerable to the potential disturbance resulting from elevated vessel and aircraft activity associated with cleanup of an oil spill. For all species, the degree of impact depends heavily on the location of the spill and cleanup response and its timing with critical natural behaviors (e.g., breeding, molting, feeding). Survival and fitness of individuals may be affected, but this infrequent disturbance is not expected to result in significant population losses.

As a result of response to the *EVOS* of 1989, and subsequent study of its effect on regional bird populations, there exists an extensive literature concerning the effects of a large oil spill in the South Alaska region (e.g., Agler and Kendall 1997; Boersma et al. 1995; Day et al. 1997a,b; *EVOS* Trustee Council 2004; Irons et al. 2000; Klowsiewski and Laing 1994; Lanctot et al. 1999; Murphy et al. 1997; Piatt and Ford 1996; Piatt et al. 1990; Rosenberg and Petrula 1998; van Vliet and McAllister 1994; Wiens et al. 2001). An estimated 100,000 to 300,000 marine birds died as a result of this spill (Piatt and Ford 1996), which occurred in March, when substantial numbers of overwintering birds were present in Prince William Sound and downstream to the west, and large numbers of seabirds were aggregating near colonies from Prince William Sound to the western Gulf of Alaska, prior to the breeding season. Although surveys and other studies carried out every year since the spill occurred indicate that populations of some marine bird species have recovered from their initial losses (e.g., common murre, black oystercatcher [*EVOS* Trustee Council 2004]), or are recovering (e.g., marbled murrelet), several species have shown little or no recovery (e.g., common loon, three cormorant species, harlequin duck, pigeon guillemot) or the recovery status is unknown (Kittlitz's murrelet). Although the effect on a bird population that is observed immediately following a spill to have suffered a large mortality is quite obvious, without frequent monitoring of each species following a spill it usually is difficult to be certain whether changes in measured population parameters are the result of lingering spill effects or natural variations that generally occur in all populations over time (Wiens and Parker 1995; Wiens 1996; Wiens et al. 2001). For example, forage fish populations utilized by many marine bird species may have experienced lingering spill effects of severe mortality or interruption of the annual cycle, in turn affecting food availability following the spill and thus influencing the effect of the spill on these bird populations or their recovery from it.

In addition to the birds occupying the open water of bays and inlets, shorebirds numbering in the tens to hundreds of thousands are at risk of oiling where they occupy various shore habitats during their spring passage to northern breeding areas (Gill and Tibbitts 1999). Particularly large numbers would be at risk on the southern Redoubt Bay, Fox River Delta, northern Montague Island, Kachemak Bay, and Copper River Delta, but substantial numbers may be at risk along most shorelines of the region during this season (Gill et al. 1994; Gill and Senner 1996; Gill and Tibbitts 1999; Alaska Shorebird Working Group 2000). Based on the experience of the *Exxon Valdez* oil spill, where studies extending 15 yr after the event continue to find oil or effects on organisms from exposure to oil, it is highly probable that not all oil spilled would be removed from the environment. Because substantial numbers of birds are present year round in the marine environment of south central Alaska, major effects are expected to result from a spill at any time of year.

Loss or Degradation of Habitat. Marine and coastal birds could be affected by platform construction and removal activities, and pipeline trenching, which could disrupt behaviors of nearby birds. Platforms constructed under the proposed action would increase the number of offshore platforms present in the inlet by three, and up to 241 km (150 mi) of new offshore pipeline could be constructed. Platform emplacement could disturb birds temporarily; pipeline trenching may also affect birds in nearshore coastal habitats if it occurs in or near foraging, overwintering, or staging areas, or near seabird colonies. About 169 km (105 mi) of new pipeline and one pipeline landfall may be constructed under the proposed action. The pipelines would likely result in the short- and/or long-term disturbance of a small amount of habitat along the pipeline routes.

While habitat impacts from the construction and operations of onshore facilities could be long term in nature, the areas disturbed would be largely limited to the immediate vicinity of the pipelines and represent a very small portion of habitat available in the Cook Inlet Planning Area. Siting new pipelines and facilities away from coastal areas would reduce the amount of marine or coastal bird habitat that could be affected. Potential habitat impacts could be further reduced by locating the new pipelines within existing utility or transportation rights-of-way, and by locating the new pipeline landfalls away from active colony sites or coastal staging areas of migratory birds. Because there are relatively few nesting colonies in Cook Inlet of Anchor Point (USGS undated), only a few seabird colonies could be affected by onshore construction activities in this area. The disturbance of birds in these colonies could be reduced or avoided by siting new pipelines and facilities away from colony sites, and by scheduling construction activities to avoid nesting periods. Overall, onshore construction activities are expected to affect only a relatively small number of birds and not result in population-level effects.

Only small numbers of nesting birds are likely to be displaced away from the vicinity of onshore pipeline corridors (a few hundred meters) by construction activity and support vessel traffic in the Cook Inlet Planning Area. Onshore habitat alteration is likely to be relatively minor in most of the development support centers. Offshore, disturbance of bottom habitats by platform placement may disrupt small areas of potential diving duck and seabird foraging habitat, but these small removals would be inconsequential.

Construction of landfalls, onshore pads, and roads is not expected to affect the relatively low numbers of loons, waterfowl, and shorebirds nesting in south central Alaska adjacent to likely oil development areas, particularly because construction may take place mainly during the winter season. Like loons and waterfowl that do not migrate out of State, seabirds disperse into nearshore or offshore waters in winter, away from likely development activity.

Disturbance Due to Noise. Noise and human activities (such as normal maintenance) could disturb birds arriving in the area during spring migration and later in the year during nesting, fall molting, and staging periods, causing them to avoid the area and nearby habitats. Because of the small number of new platforms (no more than three), the disturbance of birds in offshore waters by operational noise and human activity would likely be limited to the individuals that might be present around a platform. Potential impacts on colonies could be avoided or mitigated by siting platforms and onshore facilities away from colony sites. Noise from air guns and disturbance from survey vessel traffic could displace foraging seabirds in offshore waters, especially if exploration occurs in high seabird density areas such as the open waters adjacent to the Stevenson and Kennedy Entrances to Cook Inlet and off of the northwestern coast of Kodiak Island (MMS 2003b).

Nesting, staging, migrant, or overwintering loons, waterfowl, and seabirds occurring in areas closer to primary Cook Inlet support facilities on the Kenai Peninsula and vicinity, for example, are more likely to be overflown by aircraft than those in more distant lease areas. This is due to the convergence of routes from offshore sites to the support area, and is expected to be the case in the Gulf of Alaska, Kodiak Island, and Alaska Peninsula areas, where there are few communities capable of adequate support activity. Effects from noise disturbance would be greater in areas where higher concentrations of birds occurred and less where birds were more dispersed and in fewer numbers. The degree of effect is also dependent on whether birds are engaged in critical aspects of their seasonal activity, as well as the intensity and type of disturbance (aircraft overflights, seismic surveys, vessel traffic). In addition, several open-water areas in the vicinity of Kachemak and Kamishak Bays represent important wintering areas (December–April) for the threatened Steller eider (USFWS unpublished data), and disturbance during the winter in these areas has a greater potential to affect this listed species.

Effects on ESA-Listed Species in South Central Alaska. The cumulative effects of OCS and non-OCS program activities on the endangered short-tailed albatross, threatened Steller's eider, formerly threatened Aleutian Canada goose, and proposed Kittlitz's murrelet are expected to be similar to those noted for nonlisted species over the next 40 yr. Continued compliance with ESA regulations and coordination with the USFWS would ensure that lease-specific OCS operations would be conducted in a manner likely to avoid or greatly minimize the potential for affecting these species.

Short-tailed albatrosses occur in waters of south central Alaska, and particularly in continental shelf waters, which places them at considerable oil-spill risk. Although their small population is spread throughout the North Pacific Ocean and few would be expected to be present during any given oil-spill event, the species has a high oil vulnerability index (King and Sanger 1979), and the loss of a few individuals could be detrimental to their small population size (MM 2003b). Because Aleutian Canada geese are not known to occupy marine waters

during migration to any great extent, their risk of oil-spill contact in that habitat is considered low. It is unlikely that infrastructure development would occur near the two nesting areas, thus avoiding disturbance and onshore spills that could contact the species.

Factors such as disturbance due to increased boat traffic related to wildlife cruises and offshore oil and gas development, impacts related to oil spills, and a high oil vulnerability index (King and Sanger 1979) make the Kittlitz's murrelet particularly vulnerable to population declines. Although impacts of oil spills have been documented (van Vliet and McAllister 1994; Carter and Kuletz 1995), little is known about potential impacts of disturbance on courtship behavior, foraging ecology and feeding, or energetics (Day et al. 1999). The relatively small population size, limited distribution, apparent periodic breeding failures and low reproductive potential (Beissinger 1995), in conjunction with the above factors, has led to Kittlitz's status as a candidate species (priority 5; 50 CFR 17) under the ESA.

Steller's eiders occupying nearshore areas of the eastern Aleutian Islands to Cook Inlet from late fall to early spring could be exposed to the disturbance of air and vessel traffic, seismic surveys, oil-spill cleanup, and pipeline construction. Such activities would be scattered in occurrence, as are the flocks of eiders, or confined to specific corridors in the case of aircraft and vessels, which the flocks are likely to avoid. In general, interactions are expected to result in short-term and localized displacement. Pipeline construction is expected to result in the loss of a small amount of eider nearshore bottom-feeding habitat. Steller's eiders could be killed or injured as a result of collisions with platforms. This is most likely during migration; when visual conditions are reduced, such as in foggy weather; and during movement among habitats on wintering grounds. Because they typically are present throughout the winter, they are at risk of oil-spill contact, particularly in the northern portion of the region including Cook Inlet, where development may first occur, and potentially in the Kodiak Archipelago. However, mortality from a spill is difficult to estimate because of the substantial variation in between-year, seasonal, or even weekly presence and distribution of eiders and uncertainties of where an oil spill might occur. Based on USFWS assumptions, there is greater potential for the majority of individuals affected by factors discussed above to be from the Russian breeding population rather than the ESA-listed Alaska breeding population.

Kittlitz's murrelets typically show a very patchy distribution and are generally found in the vicinity of glaciated fjords of Cook Inlet, Prince William Sound, and southeast Alaska (Kendall and Agler 1998; Dat et al. 1999; Kuletz et al. 2003a). Exploration and development activities are expected to be separated in time, so exposure to disturbing factors such as aircraft and vessel traffic, seismic surveys, and pipeline construction could be infrequent and localized in areas where this species concentrates. There is a greater potential for effects if disturbance occurs in areas where murrelets concentrate and displacement becomes a possibility. In addition, the potential impacts from oil spills vary depending on the timing and location of the spill. For example, oil spills in College or Harrison Fjords during peak breeding or post-breeding would have larger impacts and could cause population-level effects, especially if birds come in contact with spilled oil or larger numbers of breeding age females are impacted. A large spill is likely to spread over a sufficiently large area to contact one or more bays where they may be concentrated during the summer breeding season, or offshore areas where they may be wintering in the Gulf of Alaska. For example, the *EVOS* spill resulted in the loss of an estimated 500 to

1,000 individuals, probably a substantial proportion of the world population, and certainly a major effect on this species.

Conclusion. Marine and coastal birds in Cook Inlet, including those that are ESA-listed, could be adversely affected by activities associated with the proposed action, as well as those associated with future OCS and non-OCS program activities. Potential impacts include injury or mortality of birds from collisions with platforms associated with OCS and State oil and gas development and other onshore and offshore structures (e.g., radio, television, or cell phone towers), onshore industrial, commercial, and residential development; exposure to discharges from permitted point sources such as sewage treatment discharges and nonpoint sources such as urban runoff, or accidental releases (e.g., oil spills); exposure to emissions from various onshore and offshore sources; ingestion of trash or debris; loss or degradation of habitat due to construction and operations activities; and behavioral disturbance due to the presence of, and noise generated by, equipment and human activity. Other trends such as extensive melting of glaciers (and increasing river discharges) and increased precipitation brought on by global climate change are also expected to adversely affect marine and coastal birds over the next 40 to 50 yr. While the cumulative impact of all OCS and non-OCS activities in Cook Inlet could be minor to moderate, the incremental impact due to routine Program activities would be small (see Section 4.4.7.2.2). Compliance with ESA regulations and coordination with the USFWS would ensure that lease-specific OCS operations would be conducted in a manner that is likely to avoid or to greatly minimize the potential for affecting these species.

Marine and coastal birds may also be adversely affected by exposure to oil (via direct contact or through the inhalation or ingestion of oil or tar deposits) that is accidentally released from OCS and non-OCS activities, especially near coastal areas and affecting feeding and nesting areas. The incremental impacts of accidental spills associated with the proposed action on marine and coastal birds would be small to large, depending on the location, timing, duration, and size of the spill; the proximity of the spill to feeding and nesting areas; the timing and nature of spill containment; and the status of the affected birds (see Section 4.4.7.2.2).

Whether net cumulative impacts are minor or moderate depends on the nature and duration of activities that reduce bird survival and productivity. Losses would be limited in areas occupied by scattered flocks during relatively brief staging and migration periods or scattered nest sites during the brief nesting season; however, in cases for which exposure to localized disturbance is greater, impacts have the potential to rise to the population level.

4.6.4.2.3 Fish. This section evaluates the cumulative effects of the proposed action, future OCS activities, and non-OCS activities on populations of fishes in Cook Inlet that could occur during the life of the Program. The primary routine OCS activities in the Cook Inlet Planning Area that could result in impacts on fish include seismic surveys, drilling, platform and pipeline placement; releases of permitted discharges from wells; and removal of existing structures. Potential environmental impacts associated with the building and operation of OCS facilities such as platforms and pipelines would increase in conjunction with the increased number of wells. The impacts of routine activities (exploration and site development, production, and decommissioning) on fish communities are discussed in detail in

Section 4.4.7.3.2. Overall, routine activities represent up to a minor disturbance, primarily affecting demersal fishes, with the severity of the impacts generally decreasing dramatically with distance from bottom-disturbing activities.

In the Cook Inlet Planning Area, up to three platforms would be constructed, all of which would result from the proposed action. The addition of new platforms may act as FADs that would attract rockfish and cod-like fishes in Cook Inlet. While some platforms may be allowed to remain as artificial reefs, removal of platforms would reduce available substrate and structures for these fish and some of their prey species. Some fish would be killed in the process of these platform removals although the chance of mortality would be greatly reduced by the fact that explosives would not be used in removal.

Oil and gas exploration and development in State waters could also contribute to cumulative effects on fishery resources in the Cook Inlet. Drilling of wells in State waters could also require construction of platforms and pipelines in waters of Alaska. The effects on fish would be similar to those described above for OCS oil and gas programs (Section 4.4.7.3.2). Other non-OCS activities that could impact fish communities include land use practices, point and non-point source pollution, logging, dredging and disposal of dredging spoils in OCS waters, anchoring, and commercial or sportfishing activities, and commercial shipping (including imported oil). Many of these activities would result in bottom disturbance that would affect bottom-dwelling fishes as well as their food sources in a manner similar to those described for OCS activities (Section 4.4.7.3.2).

Logging could also degrade riverine habitats that are important reproductive and juvenile habitat for migratory fish species. Erosion from areas undergoing commercial logging could increase the silt load in streams and rivers, which could reduce levels of invertebrate prey species and adversely affect spawning success and egg survival. The introduction of fine sediments into spawning gravels may render these habitats unsuitable for salmon spawning. Logging could also remove riparian canopies along some streams, which could increase solar heating of freshwater habitats. Downed timber could physically block salmon migrations. Because of past damage inflicted by commercial logging, improved forestry practices have been initiated, and timber harvests have been curtailed. Continued implementation of effective forest management techniques should help mitigate the adverse effects of logging in the future. Cumulative impacts on migratory species could also occur as a result of activities that obstruct fish movement in marine environments during migration periods.

Commercial fishing practices that are indiscriminate, such as trawling and pots, are responsible for significant amounts of bycatch that can injure or kill juveniles of many fish species (Cooke and Cowx 2006). These types of fishing practices could damage future year classes, reduce available prey species, and damage benthic habitat for many Cook Inlet fish resources. A wide variety of methods are used to target numerous species of fishes and shellfishes, including longlines, seines, setnets, trawls, and traps. Some fisheries target particular fish species returning to their natal stream or river, while other fisheries take place in pelagic waters and target mixed stocks of fishes or shellfishes.

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As a consequence of the pressure commercial fishing places on fishery resources, appropriate management is required to reduce the potential for depletion of stocks due to overharvesting. Fisheries in the Cook Inlet Planning Area are managed by State (Alaska Department of Fish and Game) and Federal (North Pacific Fishery Management Council of the National Marine Fisheries Service) agencies. Even with management, the possibility of overfishing still exists. Occasionally fisheries are closed when stocks are considered insufficient to support harvesting, and will sometimes remain closed for multiple seasons before stocks are deemed sufficient.

Although the magnitude of harvests is considerably smaller than for commercial fisheries (Fall et al. 2009), sportfishing also contributes to cumulative effects on the abundance of some fishery resources. Recreational fisheries have a potential to result in overharvest of managed species over the life of the Program. Recreational fishing is subject to harvest limits that reduce the potential for overfishing and recreational fishing methods are less destructive of EFH compared to commercial fisheries.

Subsistence fishing may also contribute to the cumulative effects on the abundance of some fishery resources. Alaska State law defines subsistence as the "noncommercial customary and traditional uses" of fish and wildlife. Subsistence fishing is subject to harvest limits that reduce the potential for overfishing. Also, much of Cook Inlet is defined as a nonsubsistence area and subsistence fishing is therefore not authorized. Consequently, subsistence fishing makes a relatively minor contribution to the reduction in fish stocks compared to commercial fishing (Fall et al. 2009).

Another source of cumulative impacts to fishery resources is the "personal use" fishery which is a legally defined as "the taking, fishing for, or possession of finfish, shellfish, or other fishery resources, by Alaska residents for personal use and not for sale or barter, with gill or dip net, seine, fish wheel, long line, or other means defined by the Board of Fisheries." In the Cook Inlet Planning Area, there are personal use fisheries for salmon, herring, and eulachon. Personal use fisheries are subject to harvest limits that reduce the potential for overfishing. Like subsistence fishing, the personal use fishery is a relatively minor contributor to the reduction in fish stocks compared to commercial fishing.

Climate change may affect fish communities in the Cook Inlet Planning Area. Climate would only be one of several factors that regulate fish abundance and distribution. Many fish populations are already subject to stresses, and global climate change may aggravate the impacts of ongoing and future commercial fishing and human use of the coastal zone. Fish respond

directly to climate fluctuations, as well as to changes in their biological environment including predators, prey, species interactions, disease, and fishing pressure. Projected changes in hydrology and water temperatures, salinity, and currents could affect the growth, survival, reproduction, and spatial distribution of marine fish species and of the prey, competitors, and predators that influence the dynamics of these species (Watson et al. 1998). Changes in primary production levels in the ocean because of climate change may affect fish stock productivity.

Climate change could potentially affect large-scale ecological processes. Important coastal habitats could be reduced or eliminated by rising sea levels and increased storm damage. For species spawning in low-lying areas or the intertidal zone, or species using coastal estuaries as nursery grounds, rising sea levels could eliminate spawning or juvenile habitat. Anadromous fish and species using nearshore marshes are likely to be most affected. In addition, the current trend of steadily increasing sea surface temperature may favor higher trophic-level fish by increasing their local productivity or by promoting the expansion of large temperate predators into Alaskan waters (Litzow 2006). The establishment of temperate species and non-native fish introduced by human activities could come at the expense of native species, particularly forage fish like herring and capelin. However, given the complexity and compensatory mechanisms of the ecosystem, predictions about the indirect effects of climate change on specific fish species are subject to great uncertainty.

Oil spills could result from OCS and non-OCS activities. The total number of oil spills and the extent of affected areas would likely increase under the proposed action in conjunction with increased levels of petroleum exploration and production (Table 4.6.2-3). Non-OCS activities, such as oil and gas development in State waters, domestic transportation of oil or refined petroleum products, and commercial shipping, may also result in accidental spills that could potentially impact fish resources within the Cook Inlet Planning Area. While effects on fishery resources would depend on the timing, location, and magnitude of specific oil spills, it is anticipated that most small to medium spills that occur in OCS waters would have limited effects on fishery resources due to the relatively small areas likely to be exposed to high concentrations of hydrocarbons and the short period of time during which potentially toxic concentrations would be present. Most adult fish in marine environments are highly mobile and may avoid high concentrations of hydrocarbons, although they may be subject to sublethal exposures. However, eggs and larvae as well as small obligate benthic species do not have the ability to avoid spills and may therefore suffer lethal or sublethal effects. Oil from a catastrophic spill that reaches shallower, nearshore areas of these planning areas has the potential to be of greatest significance to fish communities. Impacts from such spills could result in long-term, population level impacts on fish communities. The potential impacts of OCS oil spills on fish communities in Cook Inlet are discussed in detail in Section 4.4.7.3.2.

Oil reaching salmon spawning areas, nursery areas, or migration routes has the greatest potential to reduce salmon stocks. However, because of the limited area affected by oil spills relative to the wide pelagic distribution and highly mobile migratory patterns of salmonids, it is anticipated that most impacts would be limited to small fractions of exposed salmon populations. Oil spills occurring at constrictions in migration routes would have an increased potential for adversely affecting salmon. However, the weathering and dispersal of the spilled oil would limit the length of time that an area would be affected. Pacific salmon are also able to detect and

avoid oil spills in marine waters (Weber et al. 1981), which would help to reduce the potential for contact. Aggregations of salmon in marine waters typically consist of mixed stocks, so even in the unlikely event of contact with an oil spill, it is anticipated that only a small fraction of any unique spawning population would be adversely affected.

Adverse effects of oil spills on groundfishes of southern Alaska would also be a function of spill magnitude, location, and timing. Adult groundfishes are primarily demersal and would generally be subjected only to the insoluble oil and water-soluble fractions of oil that reach deeper strata. Insoluble oil fractions would sink to the bottom and be distributed diffusely as tar balls over a wide area, and would be unlikely to produce noticeable reductions in the overall numbers of adult fishes. Egg and larval stages would be at a greater risk of exposure to oil spills because spawning aggregations of many groundfish species (e.g., walleye pollock) produce pelagic eggs that could come into contact with surface oil slicks. Herring are also potentially susceptible to oil spills because they spawn in nearshore waters for protracted periods of time.

Conclusion. Cumulative impacts on fish communities in the Cook Inlet Planning Area could result from OCS and non-OCS activities. Overall, routine OCS activities represent up to a minor disturbance, with the severity of the impacts generally decreasing dramatically with distance from bottom-disturbing activities. In addition to routine OCS activities, non-OCS actions including oil and gas development in State waters, sediment dredging and disposal, logging, anchoring, fishing/trawling, commercial shipping, and pollutant inputs from point and non-point sources could also adversely affect fish populations. Many of these activities would affect fish at various life stages as well as their food sources in a manner similar to OCS activities. Fish could also be affected by the environmental changes predicted to result from climate change. The proposed action is expected to contribute only a small increment to the potential for overall cumulative effects on fish resources because of existing regulations, the limited timeframe over which most individual activities would occur, and the small proportion of available habitats that would be affected during a given period (see Section 4.4.7.3.2). Therefore, it is anticipated that the cumulative effects of OCS and non-OCS activities on fish species in the Cook Inlet Planning Areas would be similar to the effects of non-OCS activities alone.

The magnitude and severity of potential effects to fish resources from oil spills would be a function of the location, timing, duration, and size of spills; the proximity of spills to particular fish habitats; and the timing and nature of spill containment and cleanup activities. Small spills, whether from OCS or non-OCS sources, are unlikely to have overall population-level effects on fish resources. However, oil from catastrophic spills that contacted shallow nearshore areas of these planning areas has the potential to be of greatest significance to fish communities. Such spills could result in long-term, population-level impacts on fish communities (see Section 4.4.7.3.2).

4.6.4.2.4 Invertebrates and Lower Trophic Levels. This section evaluates the cumulative effects of the proposed action, and any past, present, and reasonably foreseeable future actions from OCS activities, and non-OCS activities on invertebrates in the Cook Inlet Planning Area that could occur during the life of the Program. The primary routine OCS

activities that could result in impacts on invertebrates include seismic surveys, drilling, platform and pipeline placement; releases of permitted discharges from wells; and removal of existing structures. Potential environmental impacts associated with the building and operation of OCS facilities such as platforms and pipelines would increase in conjunction with the increased number of wells. The impacts of routine activities (exploration and site development, production and decommissioning) on invertebrate communities are discussed in detail in Section 4.4.7.5.2. Overall, routine activities represent up to a moderate disturbance, primarily affecting benthic infaunal invertebrates, with the severity of the impacts generally decreasing dramatically with distance from bottom-disturbing activities.

Up to three platforms could be constructed over the life of the Program, all of which would result from the proposed action, would allow the colonization of invertebrates requiring hard substrate. While some platforms may be allowed to remain as artificial reefs, removal of platforms will reduce available substrate and structures for invertebrates and injure or kill them during removal.

Oil and gas exploration and development in State waters could also contribute to cumulative effects on invertebrates in the Cook Inlet Planning Area. Drilling of wells in State waters could also require construction of platforms and pipelines in waters of Alaska. The effects on invertebrates would be similar to those described above for OCS oil and gas programs (Section 4.4.7.5.2). Other non-OCS activities that could impact invertebrate communities include land use practices, point and non-point source pollution, logging, dredging and disposal of dredging spoils in OCS waters, anchoring, commercial or sportfishing activities, and commercial shipping (including shipping of imported oil). Many of these activities would affect bottom-dwelling invertebrates at various life stages as well as their food sources in a manner similar to OCS bottom-disturbing activities (Section 4.4.7.5.2). Other non-OCS activities generating pollution and noise may contribute to general habitat degradation (Section 4.6.3.2.2).

Commercial fishing practices that are indiscriminate, such as trawling and pots, are responsible for significant amounts of bycatch that can injure or kill juveniles of many invertebrate species. These types of fishing practices could also damage benthic habitat for many Cook Inlet invertebrate resources.

Physical and chemical changes to invertebrate habitat resulting from climate change could alter the existing distribution, composition, and abundance of invertebrates in Cook Inlet, since physical and chemical parameters are the primary influence on invertebrate communities. For example, the increase in seawater temperature may facilitate a northward expansion of subarctic and temperate invertebrate species. Rising seawater temperatures are also expected to decrease winter ice extent and duration. Currently, ice formation primarily occurs on the western side of Cook Inlet, and changes in benthic invertebrate community structure could result from the reduction in ice scour. In addition, in heavily river influenced systems like Cook Inlet, the predicted hydrologic alterations associated with climate change can rapidly alter existing invertebrate communities in the water column and benthos if the new chemical conditions are not within the physiological tolerance of the existing communities. Another significant source of physiological stress is the expected increase in ocean acidification. Crustaceans, echinoderms,

foraminiferans, and mollusks could have greater difficulty in forming shells, which could result in a reduction in their fitness, abundance, and distribution (Fabry et al. 2008).

Oil spills could result from OCS and non-OCS activities. The total number of oil spills and the extent of affected areas would likely increase under the proposed action in conjunction with increased levels of petroleum exploration and production (Table 4.6.1-3). Non-OCS activities, such as oil and gas development in State waters, domestic transportation of oil or refined petroleum products, and commercial shipping, may also result in accidental spills that could potentially impact invertebrate resources within the Cook Inlet Planning Area. While effects on invertebrate resources would depend on the timing, location, and magnitude of specific oil spills, it is anticipated that most small to medium spills that occur in OCS waters would have limited effects due to the relatively small areas likely to be exposed to high concentrations of hydrocarbons and the short period of time during which potentially toxic concentrations would be present. Large water column and benthic invertebrates are mobile and therefore have the potential to avoid high concentrations of hydrocarbons although they may be subject to sublethal exposures. However, zooplankton and infauna do not typically have the ability to avoid spills and may therefore suffer lethal or sublethal effects. Oil from catastrophic spills that reaches shallower, nearshore areas of the Cook Inlet Planning Area has the potential to be of greatest significance to invertebrate communities. Impacts from such spills could result in long-term, population-level impacts on intertidal invertebrate communities. The potential impacts of OCS oil spills on invertebrate communities in Cook Inlet are discussed in detail in Section 4.4.7.5.2.

Commercial shellfish stocks (such as tanner, snow, and red king crab) are unlikely to be exposed to surface oil. Although soluble and insoluble hydrocarbon fractions could reach deeper strata, these fractions would be distributed diffusely over wide areas and would likely not constitute a threat to shellfish stocks. Pelagic crab larvae could be affected if a large surface oil spill occurred during the spring spawning season. However, because the area affected by most spills would be expected to be small relative to overall distributions of crab larvae, overall population levels are unlikely to be noticeably affected.

Conclusion. Cumulative impacts on invertebrate communities in the Cook Inlet Planning Area could result from OCS and non-OCS activities. Overall, routine activities represent up to a moderate disturbance, primarily to benthic and near bottom invertebrates, with the severity of the impacts generally decreasing dramatically with distance from bottom-disturbing activities. Non-OCS actions including oil and gas development in State waters, sediment dredging and disposal, logging, anchoring, fishing/trawling, commercial shipping, and pollutant inputs from point and non-point sources could also adversely affect invertebrate populations. Several major classes of invertebrates could also be affected by the environmental changes predicted to result from climate change. The proposed action is expected to contribute only a small increment to the potential for overall cumulative effects on invertebrate resources because of existing regulations, the limited timeframe over which most individual activities would occur, and the small proportion of available habitats that would be affected during a given period (see Section 4.4.7.5.2). Therefore, it is anticipated that the cumulative effects of OCS and non-OCS activities on invertebrates in the Cook Inlet Planning Areas would be similar to the effects of non-OCS activities alone.

4.6.4.2.5 Areas of Special Concern. Section 4.4.8.2 identifies potential impacts that could result from routine activities or accidents related to the proposed leasing program on areas of special concern adjacent to and in the Cook Inlet Planning Area. In considering the potential cumulative effects of OCS activities on these areas, the level of routine activities and the potential for accidental spills under the proposed action must be considered with other past, present, and reasonably foreseeable future actions that would occur during the 40-yr life of the proposed program. Overall cumulative impacts on these areas of special concern in Cook Inlet consider impacts from both OCS and non-OCS activities.

National Park Service Lands. As identified in Section 4.4.8.2, NPS lands are potentially susceptible to cumulative impacts from activities related to OCS oil and gas development as a consequence of the proposed 5-yr leasing program in Cook Inlet. The potentially affected lands include the Lake Clark National Park and Preserve and the Katmai National Park and Preserve and Aniachak National Monument. Kenai Fjords National Park is east of Cook Inlet on the GOA, but it could be affected by an oil spill associated with OCS activities in Cook Inlet.

Impacts from routine OCS operations could come from facilities developed to support oil drilling and production, and could include effects from pipeline landfalls, dredging, air pollution, and the construction of roads and new facilities. Onshore oil facilities are permissible only on private acreage within each national park. All of these national parks, monuments, and preserves contain privately held acreage, and development of onshore oil support facilities is possible in these areas. Because of the more confined nature of Cook Inlet, OCS construction of facilities within the Cook Inlet Planning Area could have some negative effects on scenic values for some users if the facilities were visible from shore or air during flightseeing. It is assumed that pipeline landfalls, shore bases, and waste facilities would not be located in national parks, because of the special status and protections afforded these areas.

Increased traffic (i.e., land, sea, and air) and development within the vicinity of NPS lands could also contribute to cumulative impacts on these areas. Because the amount of traffic is restricted and activities within the parks regulated, traffic would likely create a minor addition to cumulative impacts on the NPS lands. It is anticipated that noise generated by OCS offshore construction activities would be at low levels and intermittent, and would not persist for more than a few months at any one time. It is considered unlikely that these additional activities would noticeably affect wildlife or park user values compared to current (non-OCS) activities within the considered planning areas. Increased traffic may also affect air quality (see Section 4.4.4.2 and Section 4.6.2.1.2). Air quality in Alaska is expected to remain good, with pollutant concentrations associated with offshore and onshore emission sources well within applicable State and Federal standards. The contribution of OCS program activities to cumulative air quality impacts would be small. Air quality impacts from oil spills and fires would be localized and short in duration.

Impacts on these areas could occur due to accidental releases of oil spilled from onshore facilities and offshore drilling rigs (Table 4.6.1-3). Non-OCS activities, such as oil and gas development in State waters, the domestic transportation of oil or refined petroleum products including LNG from Cook Inlet and the Alaska Peninsula, the production and storage of

petroleum products and LNG, and commercial shipping, could also result in accidental spills that could affect park lands. In addition to affecting the National Parks mentioned above, oil spills from tankering to and from Valdez could also affect Kenai Fjords NP and Wrangell St Elias NPP. Naturally occurring seeps may also be a source of crude oil introduced into nearshore waters (Kvenvolden and Cooper 2003). An oil spill would have the greatest effect if it came into contact with shoreline habitats. Impacts would depend primarily on the spill location, size, and time of year. In general, directly affected coastal fauna could include invertebrates; marine mammals; fishes that reproduce in, inhabit, or migrate through coastal areas; terrestrial mammals that feed on these fishes; and marsh birds and seabirds. Spilled oil could also affect subsistence harvests in those parks in which subsistence hunting and fishing are allowed (see Section 4.6.5.2) and could affect the number of park visitors.

National Wildlife Refuges. NWRs in the vicinity of Cook Inlet are identified in Section 3.9.2.2. NWRs potentially affected by OCS activities in the Cook Inlet Planning Areas include the Alaska Peninsula NWR, Becharof NWR, Kodiak NWR, Kenai NWR, and Izembek NWR. These refuges could be contaminated by oil spilled from offshore projects or could be subject to negative effects from routine operations associated with the development of onshore oil and gas support facilities. They could also be affected by non-OCS activities within or adjacent to refuges, including oil and gas development in State waters, the domestic transportation of oil or refined petroleum products including LNG from Cook Inlet and the Alaska Peninsula, the production and storage of petroleum products and LNG, and commercial shipping. Numerous refuge lands have been conveyed to private owners and Native corporations. Section 22(g) of ANCSA requires that new development on these lands must be in accordance with the purpose for which the refuge was formed. Thus, while development of onshore oil and gas support facilities is technically possible, such development would be subject to intensive review (as would any other development).

The potential cumulative effects of routine operations and accidental events on these NWRs are essentially the same as those discussed above for the NPS lands. In addition, subsistence hunting and fishing are permitted on all refuges in Alaska and could, therefore, be affected by accidents and routine operations in the immediate vicinity of refuge properties.

National Forests. The only national forest within the vicinity of the Cook Inlet Planning Area is the Chugach National Forest, which is located mainly on the eastern side of the Kenai Peninsula (Figure 3.9.2-1). Because there would be no OCS-related development, such as pipelines or other onshore facilities, within the Chugach National Forest, it would not be affected by routine OCS activities associated with lease sales in the Cook Inlet Planning Area. Because of the forest location, oil spills from OCS platforms or pipelines within the Cook Inlet Planning Area would not be expected to affect shoreline areas or other resources within Chugach National Forest.

The Chugach National Forest is adjacent to the Gulf of Alaska. It also borders Prince William Sound and is close to Valdez. The Chugach National Forest is, therefore, potentially susceptible to cumulative effects of routine oil-related operations from transport and tanker loading of oil produced (OCS and non-OCS) in other regions (e.g., the Beaufort Sea Planning

Area) and transported by pipeline to the Port of Valdez. Potential effects include increased noise and air pollution from tanker traffic.

Additional, non-OCS-related cumulative impacts in the national forest could result from mining operations (e.g., for gold or gravel/stone), hunting, flightseeing, ski resorts, trains, and tourism. However, the impacts of these activities are regulated through a permitting process following an approved resource use plan.

The Chugach National Forest would be potentially susceptible to oil (mostly non-OCS) spilled from tankers that utilize the loading facilities at the Port of Valdez. Oil spills that reached the coastline could affect coastal fauna; subsistence, recreational, and commercial fishing; and tourism. Impacts would depend on the size and timing of a spill and would be expected to be minor to moderate.

Other Areas of Special Concern. There are multiple State parks and State recreation areas near the Cook Inlet Planning Area, many of which border Cook Inlet or are located in areas that could be contacted by accidental oil spills. Such areas include Captain Cook State Recreation Area, Clam Gulch State Recreation Area, Chugach State Park, Kachemak Bay State Park and State Wilderness Park, and Ninilchik State Recreation Area. In addition, the Kachemak Bay National Estuarine Research Reserve is located in Cook Inlet on the southern end of the Kenai Peninsula. Cumulative impacts from offshore activities would be similar to those described above for National Parks and Refuges. Existing protections and restrictions on uses should limit the direct terrestrial cumulative impacts from OCS and non OCS activities on these areas. There is existing oil and gas infrastructure in State waters of Cook Inlet and the addition of OCS infrastructure and activities could have negative effects on scenic values for some users if the facilities were visible from shore or the air during flightseeing. It is assumed that pipeline landfalls, shore bases, and waste facilities would not be located in the State parks and recreation areas. Increased traffic (i.e., land, sea, and air) and development within the vicinity of State parks lands could also contribute to cumulative impacts on these areas. It is anticipated that noise generated by OCS offshore construction activities would be at low levels, intermittent, and would not persist for more than a few months at any one time. It is considered unlikely that these additional activities would noticeably affect wildlife or park user values compared to current (non-OCS) activities within the considered planning areas.

As described above, impacts on State parks and recreational areas could occur due to accidental releases of oil spilled from onshore facilities and offshore drilling rigs. An oil spill contacting shoreline habitats could affect subsistence harvests in those parks in which recreation and subsistence hunting and fishing are allowed and could affect the number of park visitors. Impacts would depend primarily on the spill location, size, and time of year.

Conclusion. Overall, routine OCS operations could result in minor incremental increases in effects on national sanctuaries, parks, refuges, and estuarine research reserves compared to existing non-OCS activities (see Section 4.4.8.2). Development of onshore facilities within national park lands in the vicinity of the areas included in the Program is considered unlikely, thereby making impacts from cumulative routine OCS operations unlikely in these areas. Offshore construction of pipelines and platforms could contribute to cumulative effects on

wildlife and on scenic values for park visitors due to noise and activity levels, particularly in the vicinity of Cook Inlet. However, such effects would be localized, intermittent, and temporary.

Compared to the existing potential for oil spills to affect such areas, the activities under the proposed action would be expected to result in a small incremental increase in the risk of impacts from oil spills to areas of special concern. The cumulative level of impacts from spills would depend on spill frequency, location, and size; the type of product spilled; weather conditions; effectiveness of cleanup operations; and other environmental conditions at the time of the spill. Large and catastrophic oil spills in areas adjacent to the national parks, NWRs, or national forests, whether from OCS or non-OCS sources, could negatively impact coastal habitats and fauna and could also affect subsistence uses, commercial or recreational fisheries, and tourism.

4.6.4.3 Alaska Region – Arctic

4.6.4.3.1 Marine Mammals.

Marine Mammals. The cumulative analysis considers past, ongoing, and foreseeable future human and natural activities that may occur and adversely affect marine mammals in the Arctic Planning Areas. These activities include effects of the OCS Program (proposed actions and prior and future OCS sales), oil and gas activities in State waters, vessels, subsistence harvests, recreational fishing and boating activities, military operations, scientific research, and natural phenomena. Specific types of impact-producing factors considered include noise from numerous sources, pollution, ingestion and entanglement in marine debris, vessel strikes, habitat degradation, subsistence harvests, military activities, industrial development, community development, climate change, and natural catastrophes. Section 4.4.7.1.3 provides the major impact-producing factors related to the proposed action in Cook Inlet.

Routine Activities.

<u>OCS Activities.</u> Marine mammals and their habitats in the Arctic Planning Areas could be affected by a variety of exploration, development and production activities as a result of the proposed and future OCS leasing actions (see Section 4.4.7.1.3). These activities include seismic exploration, offshore and onshore infrastructure construction, the discharge of operational wastes, and vessel and aircraft traffic. Impacts to marine mammals from these activities may include physical injury or death; behavioral disturbances; lethal or sublethal toxic effects; and loss of reproductive, nursery, feeding, and resting habitats. The degree of impact at the population level depends greatly on the status of the population (reflected in its listing under the ESA) and the degree of disturbance or harm from OCS-related activities in areas important to species survival (i.e., feeding, breeding, molting, rookery or haulout areas).

Potential impacts (primarily behavioral disturbance) to marine mammals from OCS-related seismic activity would be short-term and temporary, and not expected to result in

population level impacts for any affected species if appropriate mitigation measures are implemented.

Impacts from OCS construction and operation activities could include the temporary disturbance and displacement of individuals or groups by construction equipment and long-term disturbance of some individuals from operational noise. No long-term, population-level effects would be expected because individuals most affected by these impacts would be only those in the immediate vicinity of the construction site or operational platform and disturbance of individuals during construction would be largely temporary. In addition, appropriate mitigation measures could lessen the potential for impacts.

Operational and waste discharges (e.g., produced water, drilling muds, and drill cuttings) would be disposed of through downhole injection into NPDES-permitted disposal wells, and thus would not be expected to result in any incremental impacts to marine mammals. Liquid wastes (such as bilge water) may also be generated by OCS support vessels and on production platforms. While these wastes may be discharged (if permitted) into surface waters, they would be rapidly diluted and dispersed, and would not be expected to result in any incremental impacts to marine mammals from exposure to these wastes. Drilling and production wastes may contain materials such as metals and hydrocarbons, which can bioaccumulate through the food chain into the tissues of marine mammals. Although the bioaccumulation of anthropogenic chemicals has been reported for a variety of marine mammals, adverse impacts or population-level effects resulting from such bioaccumulation have not been demonstrated (Norstrom and Muir 1994; Muir et al. 1999).

Marine mammals could be temporarily disturbed by OCS vessel traffic (all species) or incur injury or death from collisions with support vessels (primarily larger, slower moving cetaceans). The low level of OCS vessel trips in the Arctic Planning Areas under the proposed actions would likely limit potential cumulative impacts to a few individuals, be largely short-term in nature, and not result in population-level effects. Noise from helicopter overflights would be transient in nature. Impacts to marine mammals would be behavioral in nature, primarily resulting in short-term disturbance in normal activities, and would not be expected to result in population-level effects. Overflights and vessels could disturb pinnipeds on rookeries and haul-outs. In particular, disturbance of walruses can cause stampedes, where younger animals and calves can be killed, possibly causing population-level impacts to some species. Appropriate mitigation measures such as overflight restrictions and flightline selection to avoid rookeries and haul-outs would limit the potential for adversely affecting animals at these locations.

No platforms would be removed under the proposed action for the Arctic Planning Areas.

Non-OCS Activities. A number of non-OCS activities such as oil and gas exploration and development in State waters, subsistence harvests, vessel traffic, and climate change could also affect marine mammals in the Arctic Planning Areas. Many of the effects of these activities on marine mammals would be similar in nature to those resulting from OCS-related activities, namely, behavioral disturbance, habitat disturbance, injury, or mortality, and exposure to toxic substances. Marine mammals may also be adversely affected by climate change.

Oil and Gas Exploration and Development in State Waters. The State of Alaska has made nearshore State lands available for leasing along the Beaufort Sea coast. The exploration activities (and associated impacts to marine mammals) that could result with State oil and gas lease sales may greatly outnumber exploration activities (and potential impacts to marine mammals) that could occur under the OCS proposed action.

Exploration, construction, and operation activities associated with State leases would occur in nearshore and coastal areas, while OCS platforms and pipelines would be located away from coastal areas (with the exception of relatively few pipeline landfalls and onshore bases and processing facilities). Thus, State oil and gas leasing activities may be expected to have a greater potential for affecting marine mammals in coastal habitats than would the proposed OCS actions.

Subsistence Harvesting. Subsistence harvesting has been identified as impacting marine mammals in Alaskan waters (Allen and Angliss 2011). However, annual mortality from subsistence harvests is considered to have little adverse effect on most marine mammal populations or stocks. The following are the reported estimated annual Alaska-wide subsistence harvests for marine mammals that occur in the Beaufort and/or Chukchi Seas (Allen and Angliss 2011):

- The best estimate of annual subsistence harvest of spotted seals is 5,265 animals.
- The best estimate of annual subsistence harvest of bearded seals is 6,788 animals.
- The best estimate of annual subsistence harvest of ringed seals is 9,567 animals.
- The best estimate of annual subsistence harvest of ribbon seals is 193 animals.
- The best estimate of annual subsistence harvest for the Beaufort Sea whale stock is 139 animals, which includes 25 individuals in Alaska and 114 individuals in Canada.
- The best estimate of annual subsistence harvest for the Eastern Chukchi Sea beluga whale stock is 59 animals.
- There are known subsistence harvests of narwhals by Alaska Natives.
- There are no known subsistence harvests of the Bering Sea stock of harbor porpoises by Alaska Natives. However, Suydam and George (1992) noted that individuals from this stock have been entangled in subsistence nets.
- Annual subsistence take of grey whales averaged 121 individuals between 2003 to 2007. Russian Chukotka people take most of the gray whales. The

U.S. Makah Indian Tribe has a yearly average quota of 4 whales. In 2005, an unlawful subsistence hunt and kill of a gray whale occurred in Alaska.

- No subsistence takes of the Northeast Pacific stock of fin whales are reported from Alaska or Russia.

- Subsistence take of minke whales by Alaska Natives is rare (e.g., only nine between 1930 and 1995).

- Alaska Native subsistence hunters take 14 to 72 bowhead whales per year (0.1 to 0.5% of the population). Russian and Canadian subsistence hunters also take a few bowhead whales. The annual subsistence take from 2004 to 2008 for Alaska, Russian, and Canadian Natives averaged 41.2 bowhead whales. Several cases of fishing rope or net entanglement have been reported from whales taken in subsistence hunts.

- The 1925 to 1953 estimated annual Alaska harvests of polar bears for subsistence, handicrafts, and recreation was 120 animals. Recreational harvests by non-Native sports hunters using aircraft averaged 150 annually from 1951 to 1960 and 260 annually from 1960 to 1972. A prohibition on non-Native hunting became effective in 1973. The annual subsistence harvests for the Chukchi/Bering Seas stock was 92/year in the 1980s, 49/year in the 1990s, and 43/year in the 2000s.

- The annual harvests for the Southern Beaufort Sea polar bear stock was 39/year in the 1980s, 33/year in the 1990s, and 32/year in the 2000s.

- The estimated annual subsistence harvests for the Pacific walrus from 2003 to 2007 were at 4,960 to 5,457 animals/year and included those harvested in the U.S. and Russia.

Climate Change. A concern regarding marine mammals in polar regions is the potential for climate change and associated loss in the extent of sea ice in some Arctic and subarctic waters. Some species, such as the bearded seal and polar bear, are dependent on sea ice for at least part of their life history, and may be more sensitive to changes in arctic weather, sea-surface temperatures, or extent of ice cover (Allen and Angliss 2011). Ice edges are biologically productive systems where ice algae form the base of the food chain. The ice algae are crucial to arctic cod, which is a pivotal species in the arctic food web. As ice melts, there is concern that there will be loss of prey species of marine mammals, such as arctic cod and amphipods, that are associated with ice edges (MMS 2004a). Changes in the extent, concentration, and thickness of the sea ice in the Arctic may alter the distribution, geographic ranges, migration patterns, nutritional status, reproductive success, and, ultimately, the abundance of ringed seals and other ice-dependent pinnipeds that rely on the ice platform for pupping, resting, and molting (MMS 2004a). Reductions in sea ice coverage would adversely affect the availability of pinnipeds as prey for polar bears. More polar bears may stay onshore during the summer (MMS 2004a). If the arctic climate continues to warm and early spring rains become more

widespread, ringed seal lairs might collapse prematurely, exposing ringed seal pups to increased predation by polar bears and Arctic foxes, negatively impacting the ringed seal population and, therefore, eventually the polar bear population (MMS 2004a).

The loss of sea ice could have several potential effects on bowhead whales. These would include increased noise and disturbance related to increased shipping, increased interactions with commercial fisheries, including noise and disturbance, incidental intake, and gear entanglement; changes in prey species concentrations and distribution; changes in subsistence-hunting practices; increased predation from expanding killer whale range; and competition from expanding fin, humpback, and other baleen whale ranges. Bowhead whale seasonal distribution may change with changes in seasonal ice distribution as well.

Other Impacting Factors. Marine mammals may also be impacted by other factors such as UMEs and invasive species. A UME is an unexpected stranding that involves a significant die-off of any marine mammal population, and demands immediate response (NMFS 2011b). Causes of UMEs include infections, biotoxins, human interactions, and malnutrition (NMFS 2011b). Since establishment of the UM program in 1991, there have been 53 formally recognized UMEs in the U.S., none of which occurred Arctic Planning Areas (NMFS 2011b). Invasive species could affect some marine mammals by disrupting local species and ecosystems, affecting the prey base for some marine mammals. Currently, invasive species are not a major factor in the Arctic Planning Areas. However, as climate change continues to warm Alaskan waters, the Arctic Planning Areas may become more susceptible to invasive species (e.g., from ballast discharges associated with increased vessel traffic).

Accidents. Marine mammals could be exposed to oil accidentally released from platforms, pipelines, and vessels from the Program (Table 4.4.2-1). Potential non-OCS sources of oil spills include the domestic transportation of oil, oil and gas development in State waters, and natural sources such as seeps. Accidental oil releases could expose marine mammals to oil by direct contact or through the inhalation or ingestion of oil or tar deposits. The magnitude and duration of exposure will be a function of the location, timing, duration, and size of the spill; the proximity of the spill to feeding and other important habitats; the timing and nature of spill containment; and the status of the affected animals. It is anticipated that most of the small to medium spills would have limited effects on marine mammals due to the relatively small areas likely to incur high concentrations of hydrocarbons and the short period of time during which potentially toxic concentrations would be present. The magnitude of impact would be expected to increase should a spill occur in habitats important to marine mammals or affect a number of individuals from a population listed under the ESA. Some spills from OCS activity may locally represent the principal source of oil exposure for some species, especially for spills contacting important coastal and island habitats or collecting along ice leads.

Conclusion. Cumulative impacts on marine mammals in the Beaufort and Chukchi Sea Planning Areas as a result of future OCS program and ongoing and future non-OCS program activities could be minor to moderate over the next 40 to 50 yr. Non-OCS program activities or phenomena that may affect populations of marine mammals include climate change, contaminant releases, vessel traffic, subsistence harvests, and invasive species. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.7.1.3).

Marine mammals may also be adversely affected by exposure to oil that is accidentally released from OCS and non-OCS activities. The cumulative impacts of past, present, and future oil spills on marine mammals would be minor to moderate. The incremental impacts of accidental spills associated with the proposed action on marine mammals would be small to large, depending on the location, timing, duration, and size of the spill; the proximity of the spill to feeding and other important habitats; the timing and nature of spill containment; and the status of the affected animals (see Section 4.4.7.1.3).

Terrestrial Mammals. Terrestrial mammals and their habitats could be affected by a variety of activities associated with the proposed OCS actions (Section 4.4.7.1.3). These activities include construction and operation of onshore pipelines and vehicle and aircraft traffic. Impacts to terrestrial mammals from these activities may include physical injury or death; behavioral disturbances; lethal or sublethal toxic effects; and loss of reproductive, nursery, feeding, and resting habitats. In the Arctic Planning Areas, these impacts would be in addition to similar (in nature) impacts resulting from ongoing and planned OCS lease sales under the Program.

Impacts from OCS construction and operation activities could include the injury or death of smaller mammals (such as mice and voles) and the disturbance and displacement of individuals or groups of larger species (such as caribou, muskoxen, and brown bear). Because of the limited areal extent of new pipeline under the proposed action, disturbance (primarily behavioral in nature) of most of these species during construction would be largely temporary, and no long-term population level effects would be expected. However, construction activities in the Arctic could disturb caribou in calving, foraging, or insect avoidance habitats, which could affect adult and calf survival. However, the potential for such impacts could be minimized by careful siting of new pipelines to avoid important habitats.

Species such as the Arctic fox that habituate to human activity and facilities could experience local increases in density, while bears may experience increases in mortality associated with defense of life and property killings. In the Arctic, pipelines and roads associated with the proposed action have the potential to incrementally affect local and seasonal movements of caribou.

Under the proposed action, vehicle traffic associated with normal operations and maintenance of onshore pipelines could disturb wildlife. Vehicle traffic could disturb wildlife foraging along pipelines or access roads, causing affected wildlife to temporarily stop normal activities (e.g., foraging, resting) or leave the area, while collision with vehicles could injure or kill some individuals. Because vehicle traffic would be infrequent, vehicle-related impacts associated with the proposed action would result in little incremental increase in vehicle-related impacts from current or ongoing OCS activities in the Arctic.

Up to 27 weekly helicopter trips would occur to platforms in the Arctic Planning Areas. Impacts to terrestrial mammals from helicopter overflights would be behavioral in nature, primarily resulting in short-term disturbance in normal activities, and would not be expected to result in population-level effects. Overflights disturbing active calving and overwintering sites could result in decreased survival of young or adults, and potentially result in population level

impacts to some species. Selection of flight lines to avoid overflights of important habitats would greatly limit the potential for adversely affecting calving or overwintering animals.

Terrestrial mammals in the Arctic Planning Area could also be affected by a number of non-OCS activities, including oil and gas exploration and development in State waters, and coastal and community development, and climate change. Many of the effects of these activities on terrestrial mammals would be similar in nature to those resulting from OCS-related activities, namely behavioral disturbance, habitat disturbance, and injury or mortality. The State of Alaska has made leases of State waters available along much of the Beaufort Sea coast. Because these leases are closer to shore than those for the proposed action, impacts on terrestrial mammals may exceed the potential impacts that could occur under the OCS proposed action. Implementation of the proposed action could increase coastal and community development, indirectly adding to impacts to terrestrial mammals and their habitats. Terrestrial mammals could be adversely affected by the accidental release of oil from an onshore pipeline, or by offshore spills contacting beaches and shorelines utilized by terrestrial mammals (such as caribou or brown bears). Impacts to terrestrial mammals from an oil spill would depend on such factors as the time of year and volume of the spill, type and extent of habitat affected, and home range or density of the species. Spills contacting high-use areas (such as caribou calving areas) could locally affect a relatively large number of animals. It is anticipated that most of the spills would have limited effects on terrestrial mammals, due to the relatively small areas likely to be directly exposed to the spills, and the small number and size of spills projected for the proposed action and for current and planned OCS oil and gas developments. However, some spills may locally represent the principal source of oil exposure for some species, especially for spills contacting important calving or overwintering habitats.

Conclusion. Cumulative impacts on terrestrial mammals in the Beaufort and Chukchi Sea Planning Areas as a result of future OCS program and ongoing and future non-OCS activities could be minor to moderate over the next 40 to 50 yr. Non-OCS activities or phenomena that may affect populations of terrestrial mammals include climate change, natural catastrophes, contaminant releases, and vehicle traffic. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.7.1.3).

Terrestrial mammals may also be adversely affected by exposure to oil that is accidentally released from onshore (e.g., Prudhoe Bay) and State offshore oil and gas activities. The cumulative impacts of past, present, and future oil spills on terrestrial mammals would be minor to moderate. The incremental impacts of accidental spills associated with the proposed action on terrestrial mammals would be small to large, depending on the location, timing, duration, and size of the spill; the proximity of the spill to feeding and other important habitats; the timing and nature of spill containment; and the status of the affected animals (see Section 4.4.7.1.3).

4.6.4.3.2 Marine and Coastal Birds. Section 4.4.7.2.3 discusses impacts to marine and coastal birds in the Arctic region resulting from the proposed action (OCS program activities from 2012 to 2017). Cumulative impacts on marine and coastal birds result from the incremental impacts of the proposed action when added to impacts from existing and reasonably foreseeable

future OCS program activities (that are not part of the proposed action) and other non-OCS program activities. Table 4.6.1-2 presents the exploration and development scenario for the Beaufort and Chukchi Seas cumulative cases (encompassing the proposed action and other OCS program activities) over the next 50 yr. A number of OCS program activities could affect Arctic marine or terrestrial birds or their habitats; these include offshore exploration, construction of offshore platforms and pipelines, construction of onshore pipelines, operations of offshore platforms, operational discharges and wastes, and OCS-related marine vessel and aircraft traffic. Potential impacts on marine and coastal birds from OCS program activities include injury or mortality of birds from collisions with platforms, vessels, and aircraft; exposure to operational discharges; ingestion of trash or debris; loss or degradation of habitat due to construction; and behavioral disturbance due to the presence of, and noise generated by, equipment and human activity.

Non-OCS program activities affecting marine and coastal birds in the Beaufort Sea and Chukchi Sea Planning Areas include dredging and marine disposal; coastal and community development; onshore and offshore construction and operations of facilities associated with State oil and gas development (mainly Prudhoe Bay); commercial and recreational boating; and small aircraft traffic. Potential impacts on marine and coastal birds from these activities are similar to those under the OCS program and include injury or mortality of birds from collisions with platforms associated with State oil and gas development and other onshore and offshore structures (e.g., radio, television, or cell phone towers); onshore industrial, commercial, and residential development; exposure to discharges from permitted point sources such as sewage treatment discharges and nonpoint sources such as snowmelt and stormwater runoff; or accidental releases (e.g., oil spills), as described in Section 4.6.2.1.3 and Table 4.6.2-4; exposure to emissions from various onshore and offshore sources (e.g., power generating stations and marine vessels), as described in Section 4.6.2.1.3; ingestion of trash or debris; loss or degradation of habitat due to construction and operations activities; and behavioral disturbance due to the presence of, and noise generated by, equipment and human activity. Other trends such as extensive melting of glaciers (and increasing river discharges), thawing of permafrost, and increased precipitation brought on by global climate change are also expected to adversely affect marine and coastal birds over the next 50 yr.

Injury or Mortality from Collisions. Under the cumulative scenario, annual collision injury or mortality in the Beaufort and Chukchi Sea Planning Areas could increase in the near term as platforms are built under the proposed action. Such impacts would be minor relative to those that currently involve non-OCS structures. Over time, the injury or mortality impacts from collisions could decrease as oil and gas production in the inlet declines.

Exposure to Wastewater Discharges and Air Emissions. The discharge of operational wastes and air emissions from current non-OCS related vessel traffic and platform operations in the Beaufort and Chukchi Seas is strongly regulated and would continue to be so regulated over the next 50 yr. Many wastes (such as produced water, drilling muds, and drill cuttings) would be disposed of through onsite injection into NPDES-permitted disposal wells. However, such wastes and emissions would still expose marine and coastal birds to potentially toxic materials or to solid debris that could be ingested or result in entanglement. These facilities and activities include sewage treatment plants, industrial manufacturing or processing facilities, electric

generating plants, dredging and marine disposal, and vessel traffic (e.g., cargo and tanker ships and military and research vessels). Operational wastewater discharges and air emissions associated with the proposed action would contribute to the overall cumulative risk of toxic exposure and debris ingestion or entanglement of existing non-OCS wastewater discharges and air emissions in the inlet, but the incremental increase in impact is expected to be small relative to these other activities.

Under the proposed action, marine and coastal birds could be exposed to oil accidentally released from platforms, pipelines, and vessels, and would be most susceptible to adverse impacts from spills occurring in coastal areas and affecting feeding and nesting areas. Most of the oil released to arctic waters is from leaks related to the oil industry (Section 4.6.2.3.1). Oil releases from all sources may expose marine and coastal birds via direct contact or through the inhalation or ingestion of oil or tar deposits (see Section 4.4.7.3.1).

Marine and coastal birds may become entangled in, or ingest, floating, submerged, and beached debris (Heneman and the Center for Environmental Education 1988; Ryan 1987, 1990). Entanglement may result in strangulation, injury or loss of limbs, entrapment, or the prevention or hindrance of the ability to fly or swim; all of these effects may be considered lethal. Ingestion of debris may irritate, block, or perforate the digestive tract, suppress appetite, impair digestion of food, reduce growth, or release toxic chemicals (Fry et al. 1985; Dickerman and Goelet 1987; Ryan 1988; Derraik 2002). Because the discharge or disposal of solid debris into offshore waters from OCS structures and vessels is prohibited by BOEM (30 CFR 250.40) and the USCG (MARPOL, Annex V, Public Law 100 220 [101 Statute 1458]), entanglement in or ingestion of OCS-related trash and debris by marine and coastal birds would not be expected under normal operations.

Oil Spills and Cleanup Activities. Oil spills under the cumulative scenario are shown in Table 4.6.1-3. No more than six large spills (between 1,000 and 5,300 bbl from either a platform or a pipeline) and 530 small spills (less than 1,000 bbl) would be expected as a result of the Beaufort Sea and Chukchi Sea Planning Areas OCS program over the next 50 yr.

Loons, waterfowl, and shorebirds in onshore habitats are generally at low risk of contacting a spill while nesting, but risk of exposure increases as they leave the mainland nesting areas and concentrate in coastal or marine habitats for brood rearing, molting, or staging prior to southward migration. In addition, some species (e.g., red-throated loons) forage almost exclusively offshore and bring food back to their nestlings or young, so impacts of oil spills may be greater on these species (Eberl and Picman 1993). Likewise, species nesting on barrier islands, such as common eider, gulls, and terns, are at risk when post-nesting individuals join other species in lagoons and other nearshore habitats. Substantial numbers occupy Simpson and other Beaufort Sea lagoons, Harrison and Smith Bays, Kasegaluk Lagoon, and Peard and Ledyard Bays in the Chukchi Sea at this time. For example, tens of thousands of long-tailed ducks molting in Beaufort Sea lagoons, far outnumbering other species, are at risk in July and August, and in late August and early September, a large proportion of the Pacific flyway brant population could be exposed to a spill that enters Kasegaluk Lagoon. Substantial numbers of non-breeding, foraging, or staging birds that occupy offshore areas in both the Beaufort and Chukchi Seas, when open water beyond the barrier islands is available, could be exposed to an

oil spill. Most brood rearing of loons, swans, and geese occurs on large lakes or coastal saltmarsh. Risk of oil spill contact is much greater for those using the latter habitat. The most important molting area for brant and several other species of geese (and to a lesser extent ducks) is the Teshekpuk Lake Special Area (Derksen et al. 1979, 1982). Beached oil along these coastlines could expose hundreds to low thousands or possibly greater numbers of shorebirds that pause along the coast during migration (Connors et al. 1979; Smith and Connors 1993; Andres 1994). In the southeastern Chukchi Sea, large numbers of murres and kittiwakes nesting in seabird colonies at Capes Lisburne and Thompson, together with nonbreeding individuals, form foraging flocks containing tens to hundreds of individuals that also could be exposed to an oil spill. Major effects on bird populations during the open water season are expected to follow a spill. A spill occurring in winter, when birds are virtually absent, still may have serious impacts if substantial quantities of oil are entrained in the ice and then released during the following breeding season.

Large flocks of long-tailed ducks molting in Beaufort Sea lagoons and common eiders occupying barrier islands or lagoons are particularly susceptible to oil spill impacts if they are nesting, brood rearing, or flightless. Likewise, brant staging in Kasegaluk Lagoon in the Chukchi Sea would be particularly vulnerable. For all species, the degree of impact depends heavily on the location of the spill and its timing with respect to critical natural behaviors (e.g., breeding, molting, feeding). Survival and fitness of individuals may be affected, but in many cases, this infrequent disturbance is not expected to result in significant population losses. However, effects may be greater if a spill and cleanup were to occur in the spring when large numbers of king and common eiders, long-tailed ducks, and other waterfowl, seabirds, and shorebirds are present following spring ice-lead systems. In addition, it is unlikely that all spilled oil would be removed from the environment, especially in winter; thus the remaining accumulations could move under the ice and into leads.

In addition to the potential impacts from spilled oil, the oil spill cleanup process may also affect marine and coastal birds in the Arctic region. The presence of large numbers of workers, boats, and additional aircraft during the breeding season following a spill is expected to displace waterfowl or other seabirds occupying affected offshore or nearshore waters, and shorebirds in coastal habitats for one to several seasons. Cleanup in coastal areas late in the breeding season may disturb brood-rearing, juvenile, or staging birds. Cleanup and the presence of oil can dramatically influence avian species composition and distribution (Piatt et al. 1990). It is extremely difficult to separate the effects of oiling and disturbance from cleanup activities, but either separately or together they have the potential to influence habitat use by birds (Wiens 1996). Survival and fitness of individuals may be affected to some extent, but this infrequent disturbance is not expected to result in significant population losses.

Loss or Degradation of Habitat. Marine and coastal birds could be affected by platform construction and removal activities, and pipeline trenching, which could disrupt behaviors of nearby birds. The proposed action would include the placement of up to 36 exploration and development wells and 9 offshore platforms; up to 652 km (405 mi) of new offshore pipeline and 129 km (80 mi) (0 in the Chukchi Sea) of onshore pipeline could be constructed (Table 4.4.1.1-4). Platform emplacement could disturb birds temporarily; pipeline trenching may also affect birds in nearshore coastal habitats if it occurs in or near foraging,

overwintering, or staging areas, or near seabird colonies. No pipeline landfalls would be constructed under the proposed action. Depending on where they are sited, the pipelines would likely result in the permanent elimination of a small amount of habitat along pipeline routes.

Any construction activities that take place in summer (one season) (e.g., platform installation for field development) could displace birds from within about 1 km (0.62 mi) of the construction site. However, localized burial of potential prey and destruction of a few square kilometers of foraging habitat as a result of pipeline trenching or island construction are not expected to cause a significant decline in prey availability. It is likely that much construction, particularly of gravel islands, roads, pads, and pipelines, would take place during winter when most birds are absent. Several studies speculate that increased predator populations sustained by scavenging opportunities around human habitation may indirectly contribute to long-term declines of common eiders and long-tailed duck populations currently in evidence (Day 1998; S.R. Johnson 2000; Troy 2000). The effect of any habitat loss on the species' productivity would likely be localized to these areas but may persist over the life of any offshore field and beyond. The potential exists for long-term adverse effects to occur (e.g., fecundity reduced after location to suboptimal habitat due to disturbance).

Gravel placement (for artificial islands) results in nesting and foraging habitat loss for most shorebirds (Troy 2000). On the North Slope, gravel is generally extracted from the floodplains of large rivers (Pamplin 1979; BLM 2002). The effects of gravel extraction/placement would be reduced if areas where particular species seasonally concentrate are avoided.

Winter construction would also utilize ice roads to build and access gravel island construction sites. Ice roads may be constructed over both tundra habitats and frozen ocean habitats. Ice roads constructed in tundra habitats may delay ice-off and snow melt (NRC, 2003b), potentially reducing the availability of such areas for early nesting species. Ice roads could also flatten underlying vegetation, which may discourage use of the area by tundra-nesting birds (Walker et al., 1987a, b). Water removal from lakes and ponds for ice road construction may reduce the quality or quantity of aquatic habitats important for breeding and postmolting for some species. In each of these cases, the impacts to potential nesting habitat would be temporary and localized, and birds would likely respond by selecting other areas for nesting or postmolting.

Construction camps to support onshore construction activities would temporarily remove some areas from potential use by birds, and this loss may be short- or long-term depending on the nature and effectiveness of camp abandonment following completion of construction activities. Regardless of the duration of the effect, the amount of habitat that would be disturbed would be relatively small and not be expected to affect more than a few birds.

The construction and operation of up to 320 km (200 mi) of new overland pipelines would be expected to affect bird populations in a manner similar to that identified for the construction and operation of new onshore processing facilities and associated infrastructure (especially access roads). Potential nesting or post-molting habitat would be permanently lost within the footprint of the new pipelines, causing birds to select habitats in other locations.

Although pipeline trenching would also be carried out in winter when most seabird and waterfowl species are not present, seafloor trenching could locally disrupt benthic invertebrate communities that may serve as food sources for waterfowl during other seasons. The extent to which benthic food sources could be affected and the subsequent impact to waterfowl will depend on the type and amount of benthic habitat that would be permanently disturbed by trenching, the importance of the specific habitats in providing food resources to waterfowl, and the number of waterfowl that could be affected. Because no more than three new pipelines could be built under the proposed action within the entire Arctic region, relatively little benthic habitat could be disturbed (no more than 120 ha [297 ac] within the entire region). In addition, portions of the new pipelines would be in water depths down to 60 m (200 ft) and potentially unavailable for many marine birds and waterfowl. Thus, any impacts to food sources from pipeline trenching would be very localized and short-term, and not expected to result in population-level impacts to local waterfowl populations.

The construction of new facilities and pipelines would permanently eliminate potential bird habitat at the construction sites. While this habitat loss would be long-term, the areas disturbed would represent a small portion of the habitat present in the Arctic region. Careful siting of any new facilities to avoid important nesting or post-molting habitat would further reduce the magnitude of any potential effects on local bird populations.

Helicopter or fixed-wing aircraft overflights are generally conducted at low altitudes and could disturb birds in onshore and offshore locations (Ward and Stein 1989; Ward et al. 1994; Miller 1994; Miller et al. 1994). Helicopter and aircraft overflights during spring breakup of pack ice may disturb marine species feeding in open waters and waterfowl in coastal waters, causing birds to leave the area. Similarly, overflights in summer could displace waterfowl and seabirds from preferred foraging areas and waterfowl from coastal nesting or brood-rearing areas such as the lagoon systems of the Beaufort and Chukchi Seas. Molting and staging waterfowl may temporarily leave an area experiencing helicopter overflights (Derksen et al. 1992), while geese have been reported to exhibit alert behavior and flight in response to helicopter overflights (Ward and Stein 1989; Ward et al. 1994). The type of response elicited by the birds and the potential effect on the birds will depend in large part on the time of year for the overflights and the species disturbed. Birds experiencing frequent overflights may permanently relocate to less favorable habitats (MMS 2002b). In addition, the temporary absence of adult birds may increase the potential for predation of unguarded nests and young (NRC 2003b).

Marine vessel trips could disturb seabirds and waterfowl in preferred foraging, molting, and staging areas, causing them to leave the area and move to potentially less favorable habitats. Vessel traffic that displaces nesting seabirds or waterfowl may result in an increased predation rate on eggs and young, especially in areas near gull colonies (Day 1998; S.R. Johnson 2000; Noel et al. 2005). However, the amount of vessel and aircraft traffic that could occur under the proposed action would be relatively limited. Which birds could be affected, the nature of their response, and the potential consequences of the disturbance will be a function of a variety of factors, including the specific routes, the number of trips per day, the seasonal habitats along the routes, the species using the habitats and the level of their use, and the sensitivity of the birds to vessel traffic. Traffic over heavily used feeding or nesting habitats of sensitive species could

result in population-level effects, while impacts from traffic over other areas with less sensitive species would largely be limited to a few individuals and not result in population-level effects.

Marine and coastal birds could be affected by accidental oil spills from offshore platforms and pipelines, as well as from onshore processing facilities and pipelines. In general, loons, waterfowl, seabirds, and shorebirds are not expected to survive moderate to heavy oil contact. Oiled feathers lose their insulative and water repellent characteristics, and birds die of hypothermia (Albers and Gay 1982). Swallowed oil is toxic and causes impaired physiological function and production of fewer young. Oiled eggs have significantly reduced hatching success (Albers 1980). Vulnerability of bird populations to an oil spill is highly variable because of their seasonally patchy distribution in areas where the probability of spill contact also is variable and depends on location, oceanography, weather patterns, and habitats typically occupied by and habits of, the particular species. Because they are unable to fly, molting birds probably are the most vulnerable. For all species, the degree of impact depends heavily on the location of the spill and its timing with respect to critical natural behaviors (e.g., breeding, molting, feeding).

If losses are substantial in a species with a low reproductive rate, including most marine species, recovery may take many years, or populations may not recover to their prespill size. Rate of recovery from oil spill mortality depends both on the numbers lost from a particular species population and its prevailing population trend, which in turn are determined by reproductive rate and survival rate. Oil contamination of food resources may influence recovery of a local population by affecting reproductive success and survival, with the degree of impact largely dependent on the patterns of prey distribution. Species dependent on widely dispersed prey would have more limited effects. However, seabirds, in particular, are attracted to patchy prey sources found on oceanic fronts (Piatt and Springer 2003) and would experience greater effects from prey reduction. In addition, nonbreeding individuals and those that have completed annual parental activities are better able to search for prey in uncontaminated areas. However, those individuals actively feeding young and dependent upon nearby food resources would be unable to seek uncontaminated prey elsewhere. If a leak in an onshore pipeline were to occur on a pad, the extent of the spill likely would be restricted by containment berms. If the spill occurred along the off-pad portion of the pipeline, the area covered may include several acres; if the spill were to enter streams or lakes, a larger area could be affected as the oil spreads over a water surface or is carried down a watercourse. From mid- to late summer, such an occurrence could contact broodrearing females and their young, as well as potentially large flocks of nonbreeding and postbreeding individuals undergoing wing molt.

Most bird species are absent from the Arctic region from late October to at least early April. During spring migration, substantial numbers of migrants moving north along the spring lead system in the Chukchi Sea are at risk if oil enters this habitat, since there are few alternatives until open water off river deltas is available as the ice breaks up in late spring. The most numerous species include king eider, common eider, long-tailed duck, brant, and murres. Likewise, a similar rather restricted open water situation exists in both the Beaufort and Chukchi Seas for migrants that pause awaiting further melting to the north or east, and for birds occupying delta waters and nearshore areas that have melted prior to general ice breakup and awaiting the availability of onshore habitats.

Disturbance Due to Noise. Noise and human activities (such as normal maintenance) could disturb birds. Operational facilities may provide additional nesting and feeding opportunities for some species. Unexpected noise can startle birds and potentially affect feeding, resting, or nesting behavior, and often causes flocks of birds to abandon the immediate area. Some species may react by avoiding nearby habitats, while other species may show little response or become habituated. Because of the small number of new onshore facilities (no more than four in the entire Arctic region), the disturbance of birds by operational noise and activity would likely be limited to relatively few individuals and would not be expected to result in population-level effects. Prolonged or repeated periods of maintenance activities could have a greater impact on nesting birds by increasing cooling periods of eggs, and on brood-rearing birds by increasing the time that young and adult birds are separated.

Effects on ESA-Listed Species in the Arctic Region. The cumulative effects of OCS and non-OCS program activities on ESA-listed species in the Arctic region, including the spectacled eiders and Steller's eider, are expected to be similar to those noted for nonlisted species over the next 50 yr. Continued compliance with ESA regulations and coordination with the USFWS would ensure that lease-specific OCS operations would be conducted in a manner likely to avoid or greatly minimize the potential for impacting these species.

The risk of oil contact to spectacled eiders using the spring lead system to move north into the Chukchi Sea during spring migration could be high if a spill entered the area of the leads. Since most spectacled eiders probably use overland routes from the Chukchi to complete their spring migration to nesting areas on the ACP, they are not likely to be contacted by an oil spill during migration. During the broodrearing period, when the young are led to watercourses and ultimately to nearshore marine environments for further development, staging, and fall migration, the risk of oil contact is much greater. Males could be exposed to an oil spill in any of the several bays and lagoons occupied for molting and staging in both the Beaufort and Chukchi Seas (Petersen et al. 1999). The period of highest exposure risk for a given individual migrating across the Beaufort is about 3–5 days. Females and young are at risk of contact primarily when they occupy Smith Bay in the Beaufort (Troy 2003) and Ledyard and Peard Bay (Laing and Platte 1994) in the Chukchi (this area is used by nonbreeding, failed breeding, and successful breeders, as well as both sexes) for the molt prior to fall migration (Petersen et al. 1999). Ledyard Bay has been defined as critical habitat for spectacled eiders. Since most, if not all, of the successfully breeding females (and their young) from the ACP could be concentrated in Ledyard Bay critical habitat area during the molt period, a spill affecting this group in this location could have a long-term population-level effect.

The small ACP population of Steller's eider is not likely to be exposed to an oil spill during nesting or postnesting periods, since most presumably move to the Russian side of the Chukchi prior to migrating south to molting areas. However, there is some evidence to suggest use of Peard Bay by postbreeding Steller's eiders (Martin unpubl. data; Dau and Larned 2004, 2005).

Climate Change. Climate change could have dramatic impacts on the Beaufort Sea and Chukchi Sea Planning Areas. The expected changes in air temperature would have the most immediate effect on the distribution and biology of arctic seabirds and the seabird species most

dependent on the presence of ice and snow would be expected to be among the first affected. If temperature increases in the Arctic region are as high as predicted, the Beaufort Sea pack ice could retreat more than 100 km (62 mi) from mainland Alaska (Meehan et al. 1998). This sea ice retreat could have major adverse effects on seabirds that rely on prey associated with ice edges.

Conclusion. Marine and coastal birds in the Beaufort and Chukchi Sea Planning Areas, including those that are ESA-listed, could be adversely affected by activities associated with the proposed action as well as those associated with future OCS and non-OCS program activities. Potential impacts include injury or mortality of birds from collisions with platforms associated with OCS and State oil and gas development and other onshore and offshore structures (e.g., radio, television, or cell phone towers), onshore industrial, commercial, and residential development; exposure to discharges from permitted point sources such as sewage treatment discharges and nonpoint sources such as urban runoff, or accidental releases (e.g., oil spills); exposure to emissions from various onshore and offshore sources; ingestion of trash or debris; loss or degradation of habitat due to construction and operations activities; and behavioral disturbance due to the presence of, and noise generated by, equipment and human activity. Other trends such as extensive melting of glaciers (and increasing river discharges) and increased precipitation brought on by global climate change are also expected to adversely affect marine and coastal birds over the next 40 to 50 yr. While the cumulative impact of all OCS and non-OCS activities in the Beaufort and Chukchi Seas could be minor to moderate, the incremental impact due to the proposed action would be small (see Section 4.4.7.2.3). Compliance with ESA regulations and coordination with the USFWS would ensure that lease-specific OCS operations would be conducted in a manner that is likely to avoid or to greatly minimize the potential for impacting these species.

Marine and coastal birds may also be adversely affected by exposure to oil (via direct contact or through the inhalation or ingestion of oil or tar deposits) that is accidentally released from OCS and non-OCS activities, especially near coastal areas and affecting feeding and nesting areas. The incremental impacts of accidental spills associated with the proposed action on marine and coastal birds would be small to large, depending on the location, timing, duration, and size of the spill; the proximity of the spill to feeding and nesting areas; the timing and nature of spill containment; and the status of the affected birds (see Section 4.4.7.2.3).

Whether net cumulative impacts are minor or moderate depends on the nature and duration of activities that reduce bird survival and productivity. Losses would be limited in areas occupied by scattered flocks during relatively brief staging and migration periods or scattered nest sites during the brief nesting season; however, in cases where exposure to localized disturbance is greater, impacts have the potential to rise to the population level. Population-level effects could be incurred due to the tendency for large numbers of individuals of some bird species to concentrate in certain coastal arctic locations.

4.6.4.3.3 Fish. This section evaluates the cumulative effects of the proposed action, ongoing or planned OCS activities that would occur during the life of the Program, and non-OCS activities on populations of fishes in the Beaufort and Chukchi Sea Planning Areas. The primary

routine OCS activities that could result in impacts on fish include seismic surveys; construction of artificial islands, ice roads, drilling, platforms and pipeline placement; releases of permitted discharges from wells; and removal of existing structures. Potential environmental impacts associated with the building and operation of OCS facilities such as subsea production wells, platforms, artificial islands, and pipelines would increase in conjunction with the increased number of wells. Although all of these activities would disturb bottom habitats to some degree, artificial islands result in a more complete loss of benthic habitat due to larger footprints (approximately 9 ha for artificial islands versus less than 1.5 ha for platforms) and due to complete burial of existing substrate during construction. The impacts of routine activities (exploration and site development, production and decommissioning) on fish communities are discussed in detail in Section 4.4.7.3.3. Overall, routine activities represent up to a minor disturbance, primarily affecting demersal fishes, with the severity of the impacts generally decreasing with distance from bottom-disturbing activities.

Oil and gas exploration and development in State waters could also contribute to cumulative effects on fishery resources in the Beaufort and Chukchi Planning Areas. Drilling of wells in State waters could also require construction of platforms and pipelines in waters of Alaska. The effects on fish would be similar to those described above for OCS oil and gas programs (Section 4.4.7.3.2). Other non-OCS activities that could impact fish communities include subsistence fishing, hardrock mining, sediment dredging and disposal of dredging spoils in OCS waters, and commercial shipping (tanker vessels) and anchoring. Many of these activities would result in bottom disturbance that would affect bottom dwelling fishes as well as their food sources in a manner similar to those described for OCS activities (MMS 2008; ADEC 2007a; Section 4.4.7.3.3). Commercial fishing does not occur in the Beaufort and Chukchi Sea Planning Areas, and sportfishing is minor in the Arctic but could increase if regulations change and if warming temperatures allow an increase in vessel traffic. Effects on fish resources from non-OCS dredging and marine disposal activities are expected to be similar to those described for OCS bottom disturbing activities (Section 4.4.7.3.3). Due to the small number and limited use of disposal sites in the vicinity of the Beaufort and Chukchi Sea Planning Areas, these activities are not expected to noticeably alter fish populations.

Beaufort and Chukchi Seas fall in the Kotzebue Sound and Northern Subsistence fishing areas. Subsistence fishing may contribute to the cumulative effects on the abundance of some fishery resources. Alaska State law defines subsistence as the "noncommercial customary and traditional uses" of fish and wildlife. The Alaska Department of Fish and Game defines subsistence fishing to include "the taking of, fishing for, or possession of fish, shellfish, or other fisheries resources by a resident of the state for subsistence uses with gill net, seine, fish wheel, long line, or other means defined by the Board of Fisheries." These fishing methods have more limited impacts on fish and fish habitat compared to commercial fishing methods. In addition, subsistence fishing is subject to harvest limits that reduce the potential for overfishing. Consequently, subsistence fishing makes a relatively minor contribution to the reduction in fish stocks.

Cumulative impacts on diadromous species could also occur as a result of activities that obstruct fish movement in marine environments during migration periods. For example, some structures along the Beaufort Sea mainland (e.g., the West Dock) have been shown to block the

movements of diadromous fishes, particularly juveniles, under certain meteorological conditions (Fechhelm 1999; Fechelm et al. 1999). Causeways such as the 40 m wide and 60 m long structure associated with the Red Dog Mine may impede coastal movement either by directly blocking fish or by modifying nearshore water conditions to the point where they might become too cold and saline for some species (Fechhelm et al. 1999). Although the presence of causeways has been an issue associated with oil development activities in the Beaufort Sea, the small size of the Red Dog causeway would likely have little effect on the coastal movements and distributions of Chukchi Sea fishes and shellfishes. However, it is anticipated that proper placement and design considerations for future causeway construction along the North Slope would alleviate the potential for such effects on fish movement.

There are several contaminant sources in the Beaufort and Chukchi Sea Planning Areas. The Red Dog Mine in Alaska is the largest lead and zinc mine in the world, and is presently the only base-metal lode mine operating in northwest Alaska. A study for the National Park Service (Hasselbach et al. 2004) showed extensive airborne transport of cadmium and lead from Red Dog Mine; although the study was focused only on the limits of the Cape Krusenstern National Monument, these contaminants are probably carried out into the Chukchi Sea. There are also natural sources of metals and hydrocarbons. Sediments, peats, and soils from the Sagavanirktok, Kuparuk and Colville Rivers are the largest source of dissolved and particulate metals and saturated and polycyclic aromatic hydrocarbons in the development area. However, concentrations of metals and organics in fish sampled in the Arctic Planning Areas are typically at background levels (Neff & Associates 2010).

Climate change may affect fish communities in the Beaufort and Chukchi Sea Planning Areas. Climate would only be one of several factors that regulate fish abundance and distribution. Many fish populations are already subject to stresses, and global climate change may aggravate the impacts of ongoing and future human use of the coastal zone. Fish respond directly to climate fluctuations, as well as to changes in their biological environment including predators, prey, species interactions, and disease. Projected changes in hydrology and water temperatures, salinity, and currents can affect the growth, survival, reproduction, and spatial distribution of marine fish species and of the prey, competitors, and predators that influence the dynamics of these species (Watson et al. 1998). Changes in primary production levels in the ocean because of climate change may affect fish stock productivity. Climate change may have a number of effects on fish communities, including:

- Changes in the timing of seasonal fish migrations;
- Increased storm damage to nearshore areas as the amount of open water increases and their reduction or elimination by rising sea levels;
- Reduction in habitat for sea ice dependent species; and
- Replacement of true Arctic species such as Arctic cod and capelin by the range expansions of subarctic species.

Large-scale changes in oceanographic and ecosystem processes resulting from climate change could indirectly affect fish populations in the Arctic in several ways. For example, under the existing temperature regime, the Chukchi Sea has a food web dominated by benthic consumers and cryopelagic (sea ice-associated) fishes. The loss of sea ice and the increased surface water temperature may promote a shift to a pelagic-based food web with high phytoplankton and zooplankton productivity and greater numbers of predatory fish (Loeng 2005; Hopcraft et al. 2008). Ultimately, however, predictions about the indirect and cascading ecological impacts of climate change on specific species are subject to great uncertainty, given the complexity of the ecosystem.

Oil spills could result from OCS and non-OCS activities. The total number of oil spills and the extent of affected areas would likely increase under the proposed action in conjunction with increased levels of petroleum exploration and production. The potential impacts of OCS oil spills on fish communities in the Beaufort and Chukchi Sea are discussed in detail in Section 4.4.7.3.3. Non-OCS activities, such as oil and gas development in State waters, domestic transportation of oil or refined petroleum products, and commercial shipping (including tinkering), may also result in accidental spills that could potentially impact fish resources within the Beaufort and Chukchi Sea Planning Areas. While effects to fishery resources would depend on the timing, location, and magnitude of specific oil spills, it is anticipated that most small to medium spills that occur in OCS waters would have limited effects on fishery resources due to the relatively small areas likely to be exposed to high concentrations of hydrocarbons and the short period of time during which potentially toxic concentrations would be present. In general, adult fish in marine environments are highly mobile and capable of avoiding high concentrations of hydrocarbons although they may be subject to sublethal exposures. However, fish eggs and larvae as well as small benthic obligate fish species do not typically have the ability to avoid spills and may therefore suffer lethal or sublethal effects. Oil from large and catastrophic spills that reaches shallower, nearshore areas of these planning areas has the potential to be of greatest significance to fish communities. The potential impacts of OCS oil spills on fish communities in the Beaufort and Chukchi Sea Planning Areas are discussed in detail in Section 4.4.7.3.3.

Some diadromous species of the Beaufort and Chukchi Sea Planning Areas could be at greater risk from oil spills because of their unique life-history cycles. Oil spills occurring at constrictions in migration routes, nursery areas, and spawning areas would have an increased potential for adversely affecting diadromous fishes, and catastrophic spills could result in long-term, population-level impacts on diadromous fish communities. Pacific salmon are also able to detect and avoid oil spills in marine waters (see Section 4.4.7.3.2), which would help to reduce the potential for contact. Aggregations of salmon in marine waters typically consist of mixed stocks, so even in the unlikely event of contact with an oil spill, it is anticipated that only a small fraction of any unique spawning population would be adversely affected. Juveniles of some species of whitefish (including broad whitefish, humpback whitefish, and least cisco) are intolerant of highly saline marine conditions. During their summer feeding dispersals in the Beaufort Sea, these species tend to remain within a narrow band of warm, low-salinity water along the coast. Thus, unlike most subarctic fishes, North Slope whitefish have a reduced capacity to bypass localized disruptions to their migration corridor by moving offshore and around the impasses. An oil spill, even one of limited area, could block the narrow nearshore

corridor and prevent fishes from either dispersing along the coast to feed or returning to their overwintering grounds in North Slope rivers.

Conclusion. Cumulative impacts on fish communities in the Beaufort and Chukchi Sea Planning Areas could result from OCS and non-OCS activities. It is anticipated that the cumulative effects of OCS and non-OCS activities on fish species in the Beaufort and Chukchi Sea Planning Areas would be similar to the effects of non-OCS activities alone, and the proposed action is expected to contribute only a small increment to the potential for overall cumulative effects on fish resources (see Section 4.4.7.3.3). because of existing regulations, the limited timeframe over which most individual activities would occur and the small proportion of available habitats that would be affected during a given period.

The magnitude and severity of potential effects to fish resources from oil spills would be small to large, depending on the location, timing, duration, and size of spills; the proximity of spills to particular fish habitats; and the timing and nature of spill containment and cleanup activities. Small spills, whether from OCS or non-OCS sources, are unlikely to have overall population-level effects on fish resources. However, oil from catastrophic spills that contacted shallow nearshore areas of these planning areas has the potential to be of greatest significance to fish communities. Such spills could result in long-term, population-level impacts on fish communities.

4.6.4.3.4 Invertebrates and Lower Trophic Levels. This section evaluates the cumulative effects of the proposed action, ongoing or planned OCS activities that would occur during the life of the Program, and non-OCS activities on invertebrates in the Beaufort and Chukchi Sea Planning Areas. The primary routine OCS activities that could result in impacts on invertebrates include seismic surveys, drilling, the placement of subsea wells, platforms, and pipelines; releases of permitted discharges from wells; and removal of existing structures. Potential environmental impacts associated with the building and operation of OCS facilities such as platforms, and pipelines would increase in conjunction with the increased number of wells. The impacts of routine activities (exploration and site development, production and decommissioning) on invertebrate communities are discussed in detail in Section 4.4.7.5.3. Overall, routine activities represent up to a moderate disturbance, primarily affecting benthic infaunal invertebrates, with the severity of the impacts generally decreasing dramatically with distance from bottom-disturbing activities.

The placement of new platforms over the life of the Program would allow the colonization of invertebrates requiring hard substrate. While some platforms may be allowed to remain as artificial reefs, removal of platforms will reduce available substrate and structures for invertebrates and injure or kill them during removal.

Oil and gas exploration and development in State waters could also contribute to cumulative effects on invertebrates in the Beaufort and Chukchi Sea Planning Areas. Drilling of wells in State waters could also require construction of platforms and pipelines in waters of Alaska. The effects on invertebrates would be similar to those described above for OCS oil and gas programs (Section 4.4.7.5.3). Other non-OCS activities that could impact invertebrate

communities include land use practices, point and non-point source pollution, logging, dredging/ and disposal of dredging spoils in OCS waters, and anchoring. Commercial fishing does not occur in the Arctic and therefore is not expected to add to cumulative impacts on invertebrate communities. However, this could change if regulations change and if warming temperatures allow an increase in vessel traffic. Effects on invertebrates from non-OCS dredging and marine disposal activities are expected to be similar to those described for OCS bottom disturbing activities (Section 4.4.7.5.3). Recovery of benthic invertebrates at the dredge and disposal sites to their pre-disturbance composition would likely take multiple years. Many of these activities would affect bottom dwelling invertebrates at various life stages as well as their food sources in a manner similar to OCS bottom disturbing activities (Section 4.4.7.5.1). Other non-OCS activities generating pollution and noise may contribute to general habitat degradation (Section 4.6.3.2.2).

There are several contaminant sources in the Beaufort and Chukchi Sea Planning Areas. The Red Dog Mine in Alaska is the largest lead and zinc mine in the world, and is presently the only base-metal lode mine operating in northwest Alaska. A study for the National Park Service (Hasselbach et al. 2004) showed extensive airborne transport of cadmium and lead from Red Dog Mine; although the study was focused only on the limits of the Cape Krusenstern National Monument, these contaminants are probably carried out into the Chukchi Sea. There are also natural sources of contaminants. Sediments, peats, and soils from the Sagavanirktok, Kuparuk and Colville Rivers are the largest sources of dissolved and particulate metals and saturated and polycyclic aromatic hydrocarbons in the development area. However, contaminant concentrations in the benthic invertebrates collected in the Beaufort and Chukchi Sea Planning Areas are typically at background levels (Neff & Associates 2010).

It is predicted that physical and chemical changes to arctic and subarctic invertebrate habitat could result from climate change (Section 3.3). These changes could alter the existing distribution, composition, and abundance of invertebrates, since physical and chemical parameters are the primary influence on invertebrate communities. In general, the increase in seawater temperature will facilitate a northward expansion of subarctic invertebrate species from the Bering Sea. Weslawski et al. (2011) identified the Bering Strait as a major corridor through which new invertebrate species will expand their range northward. Such expansion will likely increase overall invertebrate species diversity in the Arctic, but the new species may displace existing species or alter existing inter-specific species interactions. The change in species composition may be greatest in the eastern Beaufort Sea where arctic species currently predominate. It is predicted that a decrease in sea ice habitat would result from increasing water temperature. This may have several impacts on invertebrate communities in the Arctic including:

- Loss of habitat for invertebrates specialized to inhabit sea ice;
- An increase in the productivity of water column invertebrates with increasing temperature and open water;
- An increase in the abundance of benthic invertebrates in nearshore areas with the reduction in ice scour extent and duration (Weslawski et al. 2011); and

- An increase in benthic disturbance from severe weather as the amount of open water increases.

Changes in the magnitude, frequency, and timing of river discharge into the Beaufort/Chukchi Shelf Ecoregion are expected to result from climate change (Arctic Council 2005). Invertebrates in marine ecoregions with strong riverine inputs — like the Beaufort Neritic Ecoregion — would likely be affected by alterations in the salinity, temperature, and sediment delivery regime. Hydrologic change can rapidly alter existing invertebrate communities in the water column and benthos, if the new chemical conditions are not within the physiological tolerance of the existing communities. The greater variability in hydrologic conditions could favor tolerant and opportunistic species, thereby homogenizing invertebrate species composition and decreasing overall species diversity in the Beaufort and Chukchi Seas (Weslawski et al. 20011).

The expected increase in ocean acidification is considered to be another significant source of physiological stress. Crustaceans, echinoderms, foraminiferans, and mollusks could have greater difficulty in forming shells, which could reduce their fitness, abundance, and distribution (Fabry et al. 2008).

Oil spills could result from OCS and non-OCS activities. The total number of oil spills and the extent of affected areas would likely increase under the proposed action in conjunction with increased levels of petroleum exploration and production (Table 4.6.1-3). The potential impacts of OCS oil spills on invertebrate communities in the Beaufort and Chukchi Sea are discussed in detail in Section 4.4.7.5.3. Non-OCS activities, such as oil and gas development in State waters, domestic transportation of oil or refined petroleum products, and commercial shipping, may also result in accidental spills that could potentially impact invertebrate resources within the Beaufort and Chukchi Sea Planning Areas. While effects to invertebrates would depend on the timing, location, and magnitude of specific oil spills, it is anticipated that most small to medium spills that occur in OCS waters would have limited effects due to the relatively small areas likely to be exposed to high concentrations of hydrocarbons. Oil from catastrophic spills that reach shallower, nearshore areas of these planning areas has the potential to be of greatest significance to invertebrate communities. Large, mobile epifaunal invertebrates are capable of avoiding high concentrations of hydrocarbons although they may be subject to sublethal exposures. However, infauna and invertebrate eggs and larvae do not typically have the ability to avoid spills and may therefore suffer lethal or sublethal effects. Catastrophic spills could result in long-term alterations in the abundance of intertidal and shallow subtidal invertebrate communities. The potential impacts of OCS oil spills on invertebrate communities in the Arctic planning areas are discussed in detail in Section 4.4.7.5.3.

Conclusion. Cumulative impacts on invertebrate communities in the Beaufort and Chukchi Sea Planning Areas could result from OCS and non-OCS activities. Multiple non-OCS activities could impact invertebrate populations. It is anticipated that the cumulative effects of OCS and non-OCS activities on invertebrates would be similar to the effects of non-OCS activities alone, and the proposed action is expected to contribute only a small increment to the potential for overall cumulative effects on invertebrate resources (see Section 4.4.7.5.3).

The magnitude and severity of potential effects to invertebrate resources from oil spills would be a function of the location, timing, duration, and size of spills; the proximity of spills to particular habitats; and the timing and nature of spill containment and cleanup activities. Spills in deeper water, whether from OCS or non-OCS sources, are unlikely to have overall population-level effects on invertebrate resources because of the relatively small proportion of similar available habitats that would come in contact with released oil at concentrations great enough to elicit toxic effects. Oil from catastrophic spills that reaches shallower, nearshore areas of these planning areas has the potential to be of greatest significance to invertebrate communities. Impacts from such spills could result in long-term, population level impacts on invertebrate communities.

4.6.4.3.5 Areas of Special Concern. Cumulative impacts to these areas of special concern include impacts from both OCS and non-OCS activities. Section 4.4.8.3 identifies potential impacts that could result from routine activities or accidents related to the proposed leasing program on areas of special concern adjacent to and in the Beaufort Sea and Chukchi Sea Planning Areas.

National Park Service Lands. In the Arctic, activities associated with the Red Dog Mine and its port facility south of Kivalina on the Chukchi Sea would contribute to cumulative impacts on the Cape Krusenstern National Monument. The road from the mine (located just outside the monument) to the port crosses the northern boundary of the monument. Impacts from this facility, such as habitat loss or disturbance, are expected to be minor due to the limited activity associated with the mine.

There is minor land and air traffic in the Arctic and most visitors would arrive by sea. Because the amount of traffic is restricted and activities within the parks regulated, traffic would likely create a minor addition to cumulative impacts on the NPS lands. It is anticipated that noise generated by OCS offshore construction activities would be at low levels, intermittent, and would not persist for more than a few months at any one time. It is considered unlikely that these additional activities would noticeably affect wildlife or park user values compared to current (non-OCS) activities within the Beaufort and Chukchi Sea Planning Areas.

Impacts on these areas could occur due to accidental releases of oil spilled from onshore facilities and offshore drilling rigs. Non-OCS activities, such as oil and gas development in State waters, the domestic transportation of oil or refined petroleum products, the production and storage of petroleum products, and commercial shipping (tanker traffic) could also result in accidental spills that could affect park lands. Naturally occurring seeps may also be a source of crude oil introduced into nearshore waters (Kvenvolden and Cooper 2003). Noatak National Preserve, Kobuuk River National Preserve, Cape Krusenstern National Monument, and Bering Land Bridge National preserve all have coastlines on or near the Chukchi Sea and could potentially be affected by spills from tanker traffic. Although not an NPS land, the National Petroleum Reserve is managed by BLM and has a large shoreline component that borders the Chukchi Sea. An oil spill would have the greatest effect if it came into contact with shoreline habitats. Impacts would depend primarily on the spill location, size, and time of year. In general, directly affected coastal fauna could include marine mammals; fishes that reproduce in,

inhabit, or migrate through coastal areas; terrestrial mammals that feed on these fishes; and marsh birds and seabirds. Spilled oil could also affect subsistence harvests in those parks in which subsistence hunting and fishing are allowed and could affect the number of park visitors.

National Wildlife Refuges. NWRs in the vicinity of the Beaufort and Chukchi Sea Planning Areas are identified in 3.9.3.2 for the Beaufort and Chukchi Seas. NWRs (including three units of the Alaska Maritime NWR) potentially affected by OCS activities include the Arctic National Wildlife Refuge (ANWR) and the Alaska Maritime NWR (Chukchi Sea Unit, Gulf of Alaska Unit, Alaska Peninsula Unit).

Oil drilling and facility development are prohibited in the ANWR and are discretionary on all other refuges; however, refuges could potentially be affected by OCS oil and gas development from adjacent regions under the cumulative case scenario. These refuges could be contaminated by oil spilled from offshore projects, or could be subject to negative effects from routine operations associated with the development of onshore oil and gas support facilities. They could also be affected by non-OCS activities within or adjacent to refuges including State oil and gas development, the domestic transportation of oil or refined petroleum products, the production and storage of petroleum products and LNG, and commercial shipping. Numerous refuge lands have been conveyed to private owners and Native corporations. Section 22(g) of the Arctic Native Claims Settlement Act (1971) requires that new development on these lands must be in accordance with the purpose for which the refuge was formed. Thus, while development of onshore oil and gas support facilities is technically possible, such development would be subject to intensive review (as would any other development).

The potential cumulative effects of routine operations and accidental events on these NWR's are essentially the same as those discussed above for the NPS lands. In addition, subsistence hunting and fishing are permitted on all refuges in Alaska and could, therefore, be affected by accidents and routine operations in the immediate vicinity of refuge properties.

National Forests. There are no national forests in the Beaufort and Chukchi Sea Planning Areas.

Conclusion. Overall, routine OCS operations could result in small incremental increases in effects on national parks and wildlife refuges compared to existing non-OCS activities. Development of onshore facilities within national park lands in the vicinity of the areas included in the Program is considered unlikely, thereby making impacts from cumulative routine OCS operations unlikely in these areas. Offshore construction of pipelines and platforms could contribute to cumulative effects on wildlife and on scenic values for park visitors due to noise and activity levels. However, such effects would be localized, intermittent, and temporary. It is anticipated that lease stipulations applied at the lease sale stage could minimize the potential for cumulative impacts from routine operations on these areas.

Compared to the existing potential for oil spills to affect such areas, the activities under the proposed action would be expected to result in a small incremental increase in the risk of impacts from oil spills to areas of special concern. The cumulative level of impacts from spills would depend on spill frequency, location, and size; the type of product spilled; weather

conditions; effectiveness of cleanup operations; and other environmental conditions at the time of the spill. Large and catastrophic oil spills in areas adjacent to the national parks or refuges, whether from OCS or non-OCS sources, could negatively impact coastal habitats and fauna and could also affect subsistence uses.

4.6.5 Social, Cultural, and Economic Resources

4.6.5.1 Gulf of Mexico Region

4.6.5.1.1 Population, Employment, and Income. Section 4.4.9.1 discusses the potential impacts from the proposed action (OCS program activities from 2012 to 2017) on population, employment, and income in the GOM coast region. Cumulative impacts on these resources result from the incremental impacts of the proposed action when added to impacts from existing and reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities. Specific types of impact-producing factors related to OCS program activities considered in this analysis include total employment and regional income for counties in the 23 LMAs in the five States in the GOM coast region (described in Section 3.10). Non-OCS program activities affecting the region include employment and earnings related to various other industrial sectors (e.g., construction, manufacturing, services, and State and local government) and the high unemployment rates in the five GOM coast States.

The population in the GOM coast counties increased at an average annual rate of 1.6% between 1980 and 1990, 1.2% between 1990 and 2000, and 1.5% between 2000 and 2009. During each of these periods, the greatest increases consistently occurred in Texas (with an average annual increase of 2.1% between 2000 and 2009) and Florida (with an average annual increase of 1.6% between 2000 and 2009). The components of population increase include the natural increase due to births and net positive domestic and international migration; these trends will likely continue in the GOM coast region over the next 40 to 50 yr.

Although the proposed action would add an average of 9,084 to 14,839 jobs annually between 2012 and 2017, this increase is considered minor (though positive) since it would amount to less than 1% of total GOM coast regional employment. The largest increases would occur in Louisiana and Texas. Likewise, income produced in the region would range from $648.6 million to $1,066.2 million, with the greatest impacts occurring in Louisiana and Texas.

Population increases of 7,455 to 16,497 would be expected in Louisiana on average in each year of the proposed action, with increases of 6,260 to 14,131 occurring in Texas. Smaller population increases of 1,065 to 2,311 per new job would occur in Florida, with increases of 342 to 750 in Alabama and 283 to 620 in Mississippi. These increases also represent small changes (about 1% in the region overall), assuming a 1.5% average annual increase in population between 2009 and 2017.

Employment impacts of oil spills reaching landfall can vary considerably depending upon the total volume of oil reaching land, land area affected, and sensitivity of local environmental conditions to oil impacts. The primary impacts of oil spills would most likely fall on such activities as beach recreation, diving, commercial fishing, recreational fishing, and sightseeing. Oil spills reaching land can have both short- and long-term effects on these recreational coastal activities. Past studies (Sorenson 1990) have shown that there could be a one-time seasonal decline in tourist visits of 5 to 15% associated with a major oil spill. Since tourist movement to other coastal areas in the region often offsets a reduction in the number of visits to one area, the associated loss of business tends to be localized. As discussed in Section 4.4.9, the employment and regional income impact from an oil spill related to the proposed action would likely be greatest in Texas and Florida and this would likely continue over the next 40 to 50 yr. Oil spills will generate only temporary employment (and population) increases during cleanup operations, because such operations are expected to be of short duration.

Hurricanes are recurring events in the GOM area to which the demographic and economic patterns have adjusted. In 2005, however, Hurricanes Katrina and Rita resulted in major socioeconomic changes throughout the GOM region, affecting population, employment, and regional income. Katrina-related flooding affected 49 counties in Alabama, Louisiana, and Mississippi, resulting in estimated damage of more than $155 billion (Burton and Hicks 2005). Damage or loss of hundreds of thousands of homes has resulted in the out-migration of hundreds of thousands of individuals from the region, with varying levels of long-term population displacement. Estimated declines in employment due to hurricane damage and population displacement have ranged from 150,000 to 500,000 jobs, although employment is expected to increase as reconstruction of impacted areas proceeds (Congressional Budget Office 2005). Estimated declines in the 2005 total annual personal income in the GOM range from $10 million in Texas to more than $18 million in Louisiana (Bureau of Economic Analysis 2006).

Conclusion. The cumulative impacts of ongoing and future OCS program and non-OCS program activities would be considered beneficial because these activities would increase employment and earnings in the region over the next 40 to 50 yr. The proposed action would add to these beneficial impacts, especially in Texas and Louisiana. The incremental impact of the proposed action is expected to be small, however, because the added employment demands are less than 1% of the total GOM coast regional employment (see Section 4.4.9.1).

In areas with a large proportion of impact-sensitive industry (such as tourism), the cumulative impacts of accidental oils spills could be moderate to major, depending on the total volume of oil reaching land, the land area affected, and the sensitivity of local environmental conditions to oil impacts. The incremental impacts of oil spills associated with the proposed action would be small to medium relative to those associated with ongoing and future OCS program and non-OCS program activities.

4.6.5.1.2 Land Use and Infrastructure. Localized site-dependent impacts to land use and existing infrastructure are anticipated as a result of the construction of new OCS program oil and gas facilities in the GOM over the next 40 to 50 yr. Depending on the location selected, onshore development may necessitate minimal changes of existing or potential future uses, as

well as minor increases in demands on roads, utilities, and public services (MMS 2007c). Land use generally would evolve over time, with a majority of change to occur from general, regional economic, and demographic growth rather than from activities associated with the existing OCS program and/or State offshore petroleum production or future planned OCS or State lease sales (BOEMRE 2011a).

Recently, deepwater gas production has increased while gas production along the coast has substantially decreased. These trends have combined to lower the need for new gas processing facilities along the GOM coast. As a result, BOEM has concluded that "spare capacity at existing facilities should be sufficient to satisfy new gas production for many years, although there remains a slim chance that a new gas processing facility may be needed" (BOEMRE 2011a). With some modifications, current facilities and land use classifications would be expected to support oil and gas production associated with new leases. Likewise, service-based infrastructure would be able to support offshore petroleum-related activities in both the OCS and State waters (BOEMRE 2011a).

Ongoing non-OCS program activities that could affect land use and onshore infrastructure are expected to continue into the foreseeable future. These include offshore and onshore construction, the discharge of municipal and other waste effluents, and vessel traffic (MMS 2007c).

Activities within the GOM may be affected by post-DWH event conditions. A significant amount of information has been generated regarding the consequences of the oil spill and subsequent drilling moratorium. As the post-DWH event situation is dynamic, BOEM has been conducting ongoing monitoring of post-DWH event impacts on land use and coastal infrastructure. BOEM plans to continue to conduct targeted and peer-reviewed research, as long as the monitoring identifies long-term impacts of concern (BOEMRE 2011a).

Accidental oil releases may occur as a result of both OCS and non-OCS activities. Oil is also released from naturally occurring seeps. The extent of the impacts would depend on the location and size of the releases, but could include stresses of spill response on the community infrastructure, increased traffic to respond to cleanup, and restricted access to particular lands while cleanup is conducted. In general, these releases would be expected to have a temporary impact on land use and infrastructure (MMS 2007c).

Conclusion. Localized site-dependent impacts to land use and existing infrastructure are anticipated as a result of ongoing and future OCS program and non-OCS program activities in the GOM. These impacts could range from minor to major depending on the nature (extent and duration) of the land use change. Minimal changes of existing or potential future uses, as well as minor increases in demands on roads, utilities, and public services would be expected at locations of OCS program development. Ongoing non-OCS program activities (e.g., offshore and onshore construction and municipal discharges) that could affect land use and onshore infrastructure are expected to continue into the foreseeable future (see Section 4.4.10.1). Activities within the GOM also may be affected by the post-DWH event conditions; BOEM continues to monitor the region to identify long-term impacts of concern.

The extent of land use-related impacts resulting from accidental oil spills and naturally occurring seeps could be minor to major, depending on the location and size of the releases.

4.6.5.1.3 Commercial and Recreational Fisheries.

Commercial Fisheries. Routine OCS activities over the next 40 to 50 yr could harm or kill individual fishes, resulting in temporary movements of fishes away from areas where activities were being conducted. Impacts would vary depending on the nature of a particular structure, the phase of operation, the fishing method or gear, and the target species group. Impacts would be higher for drifting gear such as purse nets, bottom longlines, and pelagic longlines than for trawls and handlines (MMS 2005). Nevertheless, areas in which commercial fishing would be affected are small relative to the entire fishing area available to surface longliners or purse seiners. Although long-term effects on populations of most fishes in the GOM as a whole are not anticipated, populations of rare fishes or those that have highly limited distributions within the GOM could be more substantially affected if activities occurred in areas with high concentrations of individuals.

Offshore oil and gas structures placed within the depth range 0 to 60 m (0 to 200 ft) would increase annual commercial fishing costs by between $1,993 and $3,819 in the Western Planning Area, while reducing costs by between $2,507 and $11,243 in the Central Planning Area. Currently, there are no data available on the placement of offshore platforms in the Eastern Planning Area; consequently, we can draw no conclusions regarding their impact on commercial fishing costs.

Depending upon the location, magnitude, and timing of accidental oil spills from OCS platforms or pipelines, lethal or sublethal toxic effects could occur, especially for species that have pelagic eggs and larvae. If spills occurred in areas with high concentrations of eggs or larvae of a particular species, the abundance of a particular year-class could be affected. The effects of spilled oil on commercial fisheries include fishing ground area closures, contaminated fish, fouled fishing gear and associated equipment, and degradation of fishing grounds. Accidental oil releases from non-OCS activities are possible anywhere on the OCS or in State waters (i.e., from vessel collisions or transfer/lightering operations); crude oil also enters the environment from naturally occurring seeps. Although such releases typically occur in deeper water, the released oil should rise to the surface relatively quickly, and although it is anticipated that most adult fish would be able to avoid the resulting plumes of oil, larvae or eggs of some fish species could be affected and commercial fishing gear could become fouled with oil. In many cases, commercial fisheries would be able to return to the area after slicks have been cleaned up or dispersed. However, shallow coastal spills could contaminate tissues of target organisms (e.g., oyster beds and shallow benthic fishes), and affected commercial fisheries could be closed for one or more seasons.

Non-OCS program activities and factors that could affect fish populations in the GOM include State oil and gas activities, commercial shipping, land development, dredging and dredge-disposal operations, marine mineral extraction, and water quality degradation from both point and nonpoint pollution sources. In particular, space-use conflicts resulting from

exploration and delineation activities and establishment of development and production platforms could affect commercial fisheries, with some areas precluded from commercial fisheries. There are temporary exclusions from fishing in areas during exploration and delineation activities. Underwater OCS structures such as pipelines could also cause space- and gear-related conflicts, and increased vessel traffic to and from the rigs and platforms will also increase the amount of marine traffic and possible conflicts with commercial fishers. The potential for spatial preclusion also exists in both nearshore and offshore waters with increased levels of seismic survey activity.

Recreational Fisheries. While space-use conflicts with recreational fisheries caused by routine OCS operations would be minimal, there is recreational shrimp trawling for wild shrimp, and trawls could become entangled with OCS structures in the water. Deepwater recreational rod-and-reel anglers typically target oil and gas platforms because these structures usually attract target species. Noise from rig and platform installation and from seismic surveys during exploration and delineation activities could scatter target species away from some recreational fishing areas while activities are occurring and potentially for some period afterward. Temporary reductions in hook-and-line captures have been reported in some areas following seismic surveys. This may result in decreased recreational catch. Platform removal using explosives may also impact recreational fisheries. The noise would drive some fish away, some fish would be killed, and a structure that may be targeted as a fishing location by recreational anglers could be eliminated.

Oil spills from OCS or non-OCS sources could affect recreational fisheries by fouling gear with oil, tainting the catch, and degrading water quality and fishing grounds. Accidental oil releases from non-OCS activities are possible anywhere on the OCS or in State waters, and crude oil also enters the environment from naturally occurring seeps. The OCS oil spills most likely to affect recreational anglers would be shallow water spills, since recreational anglers are less likely to venture far offshore. Non-OCS oil and gas activities likely pose a greater risk in terms of potential oil spills that could affect recreational fisheries, because such activities are located closer to shore. Closure of some areas to fishing, perhaps for multiple seasons, could occur as a result of oil spills. In addition, public perception of the effects of a spill on marine life and its extent could result in a loss of revenue for the fishing-related recreation industry. Party and charter boat recreational fisheries often have losses of income because of reduced interest in fishing when a spill has occurred. Local hotels, restaurants, bait-and-tackle shops, and boat rental companies associated with recreational fisheries may experience reduced sales because of public perception related to an oil spill.

Conclusion. The proposed action would represent a small increment to the potential for overall cumulative effects on fisheries in the GOM. Routine OCS program activities would be unlikely to have cumulative population- or community-level effects on fishery resources because of the limited timeframe over which most individual activities would occur, because a small proportion of habitat, relative to similar available habitat, could be affected during a given period and because existing stipulations are in place to avoid impacts on sensitive habitats such as hard-bottom areas and topographic features. Non-OCS program activities, including State oil and gas development, commercial fishing, and sportfishing, could also contribute to cumulative effects on fisheries. Depending on specific conditions during a large spill, there could be substantial

economic losses for commercial fisheries as a consequence of reduced catch, loss of gear, or loss of fishing opportunities during cleanup and recovery periods. Non-OCS program sources of spills, including State oil and gas production, have a potential to cause similar effects. The occurrence of a very large spill, such as could occur from a tanker accident, could have substantially greater effects on fisheries.

It is anticipated that the proposed action would represent a small increment to the overall cumulative effects on recreational fisheries in the GOM. Routine OCS activities from the proposed action, as well as from ongoing and planned OCS activities would be unlikely to have cumulative population- or community-level effects on fishery resources because of the limited timeframe over which most individual activities would occur, because only a small proportion of habitat, relative to similar available habitat, could be affected during a given period, and because of existing stipulations that are in place to avoid impacts to sensitive habitats such as hard bottom areas and topographic features. Construction of new platforms could represent a small increase in the availability of desirable recreational fishing locations for recreational anglers.

4.6.5.1.4 Tourism and Recreation. Noise from platform installation and platform removal can affect recreational fishing by temporarily disturbing fish and by possible fish kills if explosives are used to remove platforms. Platforms installed within 16 km (10 mi) of coastal recreation areas, such as beaches, parks, and wilderness areas, can affect recreational experiences by affecting ocean views. Transportation of oil and gas, combined with other commercial, industrial, and recreational transportation activities that continue to occur within the GOM, can impact recreational experiences through increased noise, boat wake disturbances, visual intrusions, and increased trash and debris washing ashore. In addition to transportation and oil and gas, other activities contribute to the trash and debris found on the beaches including (but not limited to) beach visitors, commercial and recreational fishing, merchant shipping, naval operations, and cruise lines.

Non-OCS activities that might impact recreation and tourism include offshore construction (e.g., dredging and marine disposal, extraction of non-energy minerals, State oil and gas development, domestic transportation of oil and gas, and foreign crude oil imports), onshore construction (e.g., coastal and community development), the discharge of municipal and other waste effluents, and vessel traffic (e.g., commercial shipping, recreational boating, and military training and testing).

Accidental oil releases may occur as a result of both OCS and non-OCS activities, and oil is also released from naturally occurring seeps. The magnitude of the impacts would depend on the location and size of the releases, as well as their timing with respect to peak tourism seasons. These releases are expected to have a temporary impact on recreation and tourism in the GOM region. Closures of recreational areas for up to 6 weeks could occur to accommodate cleanup operations. Releases identified under the proposed action are anticipated to be small, for the most part, and to occur in waters greater than 200 m (660 ft) in depth. These releases would be a small addition to releases associated with other OCS and non-OCS activities.

Severe storm events such as hurricanes have the potential to impact the recreation and tourism economy if they result in severe beach damage and/or destruction of existing public infrastructure. While hurricanes are regularly occurring events in the GOM, Hurricanes Katrina and Rita in 2005 caused unusually large amounts of damage to the tourism and recreation infrastructure in the area. These storms destroyed recreational beaches, public piers, hotels, casinos, marinas, recreational pleasure craft and charter boats, and numerous other recreational infrastructure. Almost 70% of the recreational fishing assets in Mississippi alone were damaged by Katrina (Posadas 2005). Of the 13 casino-barge structures present along the Mississippi coast prior to Katrina, most suffered severe external damage, seven broke completely free of their moorings, two partially broke free and damaged adjoining structures, one sank, and one was deposited inland by the storm surge (National Institute of Standards and Technology, draft). The full extent of impacts to tourism and recreation by the hurricanes has yet to be fully quantified, but it will likely take years for tourism and recreation to return to pre-hurricane levels.

Conclusion. Cumulative impacts on recreation and tourism from OCS and non-OCS program activities in the GOM would be limited for most routine activities, with the exception of impacts associated with large oil spills during the peak tourist season, which could be moderate (but short-term). The incremental contribution of routine Program activities to cumulative impacts would be minor, resulting from small incremental increases in construction and transportation noise and related visual intrusions, potential increases in trash and debris related to these activities, and the potential for a relatively small number of accidental releases (see Section 4.4.12.1).

4.6.5.1.5 Sociocultural Systems. The GOM coastal commuting zone is ethnically and culturally diverse and includes a well-established oil and gas industry focused mainly in Louisiana and Texas (Section 3.14.1.1). For the most part, oil and gas development on the OCS will make use of existing pipelines and onshore infrastructure. Increases in activities associated with OCS program development are anticipated to be incremental and qualitatively similar to current patterns. However, as deepwater drilling expands, jobs that require longer, unbroken periods of offshore work will increasingly attract a more international workforce promoting sociocultural heterogeneity in coastal support communities, particularly in Texas and Louisiana.

Non-OCS program activities and processes affecting sociocultural systems are expected to continue. These include oil and gas development in State waters, coastal habitat changes, coastal land loss, regional economic changes, and recovery from storms and major oil spills. These activities and processes can lead to major impacts related to population change, job creation and loss, and changes in social institutions including family, government, politics, and education.

Accidental oil and other spills could result from both OCS and non-OCS activities. The magnitude of spill impacts depends on their size, location, and timing. With the exception of major spills (such as occurred with the DWH event), they are expected to have only temporary physical and economic effects and therefore should not significantly alter sociocultural systems.

The wetlands that supply subsistence resources are susceptible to oil spills. The Louisiana parishes of St. Mary, Terrebonne, and Lafourche, are home to populations engaged in renewable resource harvesting, are also areas of heavy to moderate concentrations of oil and gas industry facilities. As discussed in Section 3.7, the wetlands in coastal Louisiana are rapidly diminishing because of engineering projects to control the Mississippi River, natural subsidence, the development of the oil and gas industry, and climate change (Field et al. 2007). Because of the construction of flood-control structures, the Mississippi River no longer floods Louisiana's wetlands; these floods previously deposited new silt to offset coastal erosion. Extraction of oil and gas from coastal areas may have resulted in some subsidence of bayou lands. In many areas, Louisiana's coastal wetlands have been cut by a network of canals constructed to lay pipes bringing oil and gas to onshore refining facilities (Field et al. 2007). Cut in straight lines from the shore, these canals exacerbate the erosive force of tides and storm surges. Climate change has resulted in slowly increasing sea levels and an increased intensity of coastal storms and hurricanes. The end result has been an overall decrease in Louisiana's wetlands and a reduction in fresh and brackish wetlands and the subsistence species they support, along with an increase in salt marshes. Cumulatively, these changes constitute major impacts on a way of life that was once common along the GOM coast.

It is anticipated that global climate change will result in increased temperatures and rising relative sea levels along the GOM coast and these changes will be accompanied by an increase in severe storms in the coming decades. Rising relative sea levels and increased erosion have been observed all along the coast (Field et al. 2007). Those who rely at least in part on harvesting renewable resources from the sea, either as subsistence or commercial fishers and shrimpers, are predicted to be most vulnerable to adverse effects resulting from these changes (Nicholls et al. 2007).

Conclusion. Absent a major oil spill, the greatest contribution to cumulative impacts from the proposed action is expected to come from the expansion of deepwater activities, which would create jobs that require longer, unbroken periods of work offshore, specialized skills, and in-migration of part of the workforce. These are already trends in the OCS oil and gas industry. Since these and other potential sociocultural effects are expected to be minimal additions to existing trends, the incremental impact on sociocultural systems during the life of the Program would not result in significant changes to these systems and would, therefore, be small (see Section 4.4.13.1).

In terms of subsistence and renewable resource harvesting, non-OCS activities such as flood control along the Mississippi River and natural trends such as global climate change have produced major adverse impacts on the GOM coast region. Ongoing and future OCS and non-OCS program activities would add to these impacts. The relative contribution of the proposed action to cumulative impacts on subsistence harvesting is expected to be small to medium.

4.6.5.1.6 Environmental Justice. Over the next 40 to 50 yr, air emissions from OCS and non-OCS onshore facilities and helicopter and vessel traffic traversing coastal areas would be highest in the States such as Texas and Louisiana that contain the greatest amounts of infrastructure. Lesser amounts of infrastructure would occur in Mississippi and Alabama. No

onshore infrastructure supporting OCS operations currently exists in Florida, and none will be built as a result of the proposed action. It is assumed that 75% of the activity from the Program will occur in deep and ultra-deep waters, with offshore air emissions greatest in the coastal areas of Texas and Louisiana, the areas with the greatest amounts of oil and gas activity, with lesser amounts in occurring in Mississippi and Alabama. The coastal areas of Florida are located so far from OCS activities that no environmental justice issues from offshore air emissions are expected to impact the coastal parts of the State. The effects of the OCS program on air quality have been analyzed in Section 4.4.4. This analysis concluded that routine operations associated with the proposed 5-yr program would result in NO_2, SO_2, PM_{10}, and CO levels that are well within the NAAQS. Disproportionate impacts on low-income or minority populations would be minor, because the coastal effects from offshore activities are expected to be small, based on the established and increasing trend toward movement of oil and gas activities into deeper waters of the GOM.

The proposed action would result in levels of infrastructure use and construction similar to those which have already occurred in the GOM coast region during previous programs. These activities are not expected to expose residents to notably higher risks than currently occur. While the distribution of offshore-related activities and infrastructure indicates that some places and populations in the GOM region would continue to be of environmental justice concern, the incremental contribution of the Program is not expected to affect those places and populations.

Non-OCS activities and processes that are ongoing, expected to continue into the foreseeable future, and that have the potential for creating environmental justice impacts include non-OCS oil and gas development, coastal habitat changes, coastal land loss, economic development, regional economic changes, and recovery from storms. These activities and processes could disproportionately impact low-income and minority populations.

In addition to oil and chemical spills that could occur with the proposed action, oil releases and spills could also occur from other non-OCS sources such as natural oil seeps, State oil and gas activity, and petrochemical refining and processing. While the timing and location of these spills cannot be determined and some low-income and minority populations are resident in some areas of the GOM coast, in general the coasts are home to more affluent groups. Low-income and minority groups are not more likely to bear more negative impacts than are other groups.

Conclusion. In the GOM, ongoing and future OCS and non-OCS program activities in combination with the effects of storm and hurricane damage and regional economic issues would result in disproportionate moderate to major adverse cumulative impacts on low-income and minority populations. The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.14.1).

The incremental impacts of accidental oil spills associated with the proposed action would be small to large, depending on the size, location, and timing of the spill (see Section 4.4.14.1).

4.6.5.1.7 Archeological and Historic Resources. Section 4.4.1.5 discusses the potential impacts from the proposed action (OCS program activities from 2012 to 2017) on onshore and offshore environments in the GOM. Cumulative impacts on archeological and historic resources result from the incremental impacts of the proposed action when added to impacts from existing and reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities. Table 4.6.1-1 presents the exploration and development scenario for the GOM cumulative case (encompassing the proposed action and other OCS program activities). Specific types of impact-producing factors related to OCS program activities considered in this analysis include drilling rig and platform emplacement, pipeline emplacement, anchoring, new onshore facilities, ferromagnetic debris associated with OCS activities, and oil spills. Non-OCS program activities include trawling, sport diving, commercial treasure hunting, and channel dredging. Natural phenomena such as waves, currents, and tropical storms are also considered.

Prehistoric Resources. Offshore development could result in an interaction between a drilling rig, platform, pipeline, or anchors and an inundated prehistoric site. This direct physical contact with a site could destroy artifacts or site features and could disturb the stratigraphic context of the site. The result would be the loss of archaeological data on prehistoric migrations, settlement patterns, subsistence strategies, and archaeological contacts for the Americas and the Caribbean.

Since 1973, BOEM (formerly the MMS) has required that an archaeological survey be conducted prior to development of mineral leases determined to have potential for cultural resources including prehistoric archaeological sites. High-probability areas for the occurrence of prehistoric sites in the GOM include the region of the OCS shoreward of the 45-m (50-ft) isobath. Although an archaeological survey would identify most of the cultural resources in the APE for the project and routine operations related to OCS program activities would avoid all known cultural resources, it is likely that impacts to prehistoric resources may have already occurred as a result of OCS program and non-program activities that took place before implementation of the 1973 archaeological survey requirement.

Onshore development could result in direct physical contact between the construction of new onshore facilities or pipeline trenches and previously unidentified prehistoric sites. This direct physical contact with a prehistoric site could cause physical damage to or complete destruction of information on the prehistory of the region and North America. Federal and State laws and regulations initiated in the 1960s began requiring archaeological surveys prior to permitting any activity that might disturb a significant archaeological site. Therefore, it can be assumed that, since the introduction of the archaeological resource protection laws, most coastal archaeological sites have been located, evaluated, and mitigated prior to construction. However, impacts to coastal prehistoric resources may have already occurred as a result of various onshore construction activities prior to enactment of the archaeological resource protection laws.

Trawling activity in the GOM affects only the uppermost portion of the sediment column (Garrison et al. 1989). This zone would already have been disturbed by natural factors relating to the destructive effects of marine transgression and continuing effects of wave and current

action. Therefore, the effect of future trawling on most prehistoric archaeological sites is expected to be minor.

Tropical storms and hurricanes are yearly occurrences in the GOM and may be increasing in intensity as a result of global climate change (Section 3.3.1). Past storm events have affected all areas of the GOM, from west Texas to south Florida, and broad areas are affected by each storm (DeWald 1980). Prehistoric sites in shallow waters or coastal beach sites are exposed to the destructive effects of wave action and scouring currents during these events. Under such conditions, it is highly likely that artifacts would be dispersed and the site context disturbed, resulting in the loss of archaeological information. Overall, a significant loss of data from nearshore and coastal prehistoric sites may have occurred, and will continue to occur, from the effects of tropical storms and hurricanes. It is assumed that some of the data lost have been significant and/or unique, resulting in a moderate to major level of impact.

Most channel dredging occurs at the entrances to bays, harbors, and ports. These areas have a high probability for prehistoric archaeological sites, as they are associated with drowned river valleys, which are known to have a high probability for prehistoric sites. It is assumed that some of the archaeological data that have been lost as a result of dredging have been significant and unique; therefore, the impact to prehistoric archaeological sites as a result of past channel dredging activities has probably been moderate to major. In many areas, the USACE now requires remote-sensing surveys prior to dredging activities to minimize such impacts (Espey, Huston & Associates 1990).

An accidental oil spill could affect coastal prehistoric archaeological sites, but the direct impact of oil on most sites is uncertain. Protection of such sites during an oil spill event requires specific knowledge of its location, condition, nature, and extent prior to impact; however, the GOM coastline has not been systematically surveyed for archaeological sites. Existing information indicates that, in coastal areas of the GOM, prehistoric sites occur frequently along the barrier islands and mainland coast and along the margins of bays and bayous. Thus, any spill that contacts land would involve potential impacts on prehistoric sites.

Heavy oiling of a coastal area could conceal intertidal sites that may not be recognized until they are inadvertently damaged during cleanup (Whitney 1994). Crude oil may also contaminate organic material used in ^{14}C dating, and, although there are methods for cleaning contaminated ^{14}C samples, greater expense is incurred (Dekin et al. 1993). The major source of potential impacts from oil spills is the harm that could result from unmonitored shoreline cleanup activities. Unauthorized collecting of artifacts by cleanup crew members is also a concern, albeit one that can be mitigated with effective training and supervision. Damage or loss of significant archaeological information could result from the contact between an oil spill and a prehistoric archaeological site; therefore, cumulatively the level of impacts from oil spills (past, present, and future) to prehistoric archaeological sites ranges from moderate to high.

Historic Resources. Direct physical contact between a routine activity and a shipwreck site could destroy fragile ship remains, such as the hull and wooden or ceramic artifacts, and could disturb the site context. The result would be the loss of archaeological data on ship

construction, cargo, and the social organization of the vessel's crew, and the concomitant loss of information on maritime culture for the time period from which the ship dates.

Since 1973, BOEM has required archaeological (historical) surveys be conducted prior to development of mineral leases determined to have potential for historic-period shipwrecks. The high-probability areas for the occurrence of historic-period shipwrecks in the GOM consist of nearshore areas, port vicinities, and ship-specific polygons. Based on experience from the last 10 years (as reported by Church and Warren [2008]; Ford et al. [2008]; Atauz et al. [2006]), archaeological surveys are now also being requested for the APE that includes any potential bottom-disturbing activities in deepwater areas that could be affected by a project. Although an archaeological survey would identify most of the cultural resources in the APE for the project and routine operations related to OCS program activities would avoid all known cultural resources, it is likely that impacts on historic-period shipwrecks may have already occurred as a result of OCS program and non-program activities that took place before implementation of the archaeological survey requirement in 1973.

Onshore development could result in direct physical contact between the construction of new onshore facilities or pipeline trenches and previously unidentified historic sites. Federal and State laws and regulations initiated in the 1960s began requiring archaeological surveys prior to permitting any activity that might disturb a significant archaeological site. Therefore, it can be assumed that, since the introduction of the archaeological resource protection laws, most coastal archaeological sites have been located, evaluated, and mitigated prior to construction. However, impacts to coastal historic sites may have already occurred as a result of various onshore construction activities prior to enactment of the archaeological resource protection laws.

Trawling activities in the GOM only affect the uppermost portion of the sediment column (Garrison et al. 1989). On many wrecks, this zone would already have been disturbed by natural factors and would contain only artifacts of low specific gravity (e.g., ceramics and glass) which have lost all original contexts. Therefore, the effect of future trawling on most historic shipwreck sites would be minor.

Sport diving and commercial treasure hunting are significant factors in the loss of historic data from shipwreck sites. While commercial treasure hunters generally affect wrecks having intrinsic monetary value, sport divers may collect souvenirs from all types of shipwrecks. It is assumed that some of the data lost have been significant and/or unique. The known extent of these activities suggests that they have resulted in a major impact to historic-period shipwrecks.

Tropical storms and hurricanes are yearly occurrences in the GOM and may be increasing as a result of global climate change (Section 3.3.1). Past storms have affected all areas of the GOM, from west Texas to south Florida, and broad areas are affected by each storm (DeWald 1980). Shipwrecks in shallow waters and coastal historic sites are exposed to greatly intensified longshore currents and high-energy waves during tropical storms (Clausen and Arnold 1975). Under such conditions, it is highly likely that artifacts of low specific gravity would be dispersed. Some of the original information contained in the site would be lost in this process, but a significant amount of information may also remain. BOEM-sponsored studies conducted specifically to examine the effect of hurricanes on shipwrecks in the GOM found that

storm effects on wrecks varied, with some wrecks being damaged, some unaffected, and others protected because the storm caused sediment to be deposited on the wreck (Gearhart et al. 2011). Overall, a significant loss of data from historic sites has probably occurred, and will continue to occur, from the effects of tropical storms and hurricanes. It is assumed that some of the data lost has been significant and/or unique, resulting in a moderate to major level of impact.

Most channel dredging occurs at the entrances to bays, harbors, and ports. These areas have a high probability for historic shipwrecks, and the greatest concentrations of historic wrecks are likely to be associated with these features (Garrison et al. 1989). Assuming that some of the data lost have been unique, the impact to historic sites as a result of past channel dredging activities has probably been moderate to major. In many areas, the USACE requires remote-sensing surveys prior to dredging activities, to minimize such impacts (Espey, Huston & Associates 1990).

Past, present, and future oil and gas exploration and development on the OCS will result in the deposition of tons of ferromagnetic debris on the seafloor. This modern marine debris will tend to mask the magnetic signatures of historic shipwrecks, particularly in areas that were developed prior to requiring archaeological surveys. Such masking of the signatures characteristic of historic shipwrecks increases the potential that significant or unique historic information may be lost. However, BOEM requires avoidance or investigation of any unidentified magnetic anomaly that could be related to a shipwreck site prior to permitting bottom-disturbing activities. The increase in impacts to historic shipwrecks from magnetic masking could range from minor to moderate.

An accidental oil spill could affect a coastal historic site, but the direct impact of oil on most historic sites is uncertain. The primary source of potential impacts from oil spills is unmonitored shoreline cleanup activities (Bittner 1996; see Section 4.4.15.1.2). Unauthorized collecting of artifacts by cleanup crew members is also a concern, albeit one that can be mitigated with effective training and supervision. Damage or loss of significant historic information could result from oil spill cleanup activities; therefore, the cumulative impact from oil spills (past, present, and future) on historic sites could range from moderate to major.

Conclusion. The cumulative impacts of ongoing and future OCS and non-OCS program activities on prehistoric and historic archaeological sites in the GOM are currently unknown, but could range from minor to moderate, mainly because activities occurring on the OCS prior to BOEM's survey requirement (in effect since 1973) may already have affected significant archaeological sites. Other important impact-producing factors that likely have had, and will continue to have, an impact on both prehistoric and historic archaeological sites are channel dredging, tropical storms, and hurricanes. Commercial treasure hunting and sport diving may also result in a loss of artifacts at historic-period shipwreck sites. The incremental contribution of routine Program activities is expected to be small because required archaeological surveys would identify significant cultural resources to be avoided (see Section 4.4.15.1).

Cumulative impacts on prehistoric and historic sites due to accidental oil spills would result mainly from cleanup activities (direct impacts to the sites are uncertain) and could range from moderate to major. The incremental impacts of oil spills associated with the proposed

action would be small to medium relative to those associated with ongoing and future OCS and non-OCS program activities.

4.6.5.2 Alaska – Cook Inlet

4.6.5.2.1 Population, Employment, and Income. Section 4.4.9 discusses the potential impacts from the proposed action (OCS program activities from 2012 to 2017) on population, employment, and income in the south-central Alaska region. Cumulative impacts on these resources result from the incremental impacts of the proposed action when added to impacts from reasonably foreseeable future OCS program activities (there are no existing OCS program activities) and other non-OCS program activities. Specific types of impact-producing factors related to OCS program activities considered in this analysis include total employment and regional income for the south Alaska region, which corresponds to the Cook Inlet Planning Area (described in Section 3.10). Non-OCS program activities affecting the region include employment and earnings related to various other industrial sectors (e.g., construction, manufacturing, services, and State and local government).

The population in the Cook Inlet Planning Area increased at an average annual rate of 3.2% between 1980 and 1990, 1.3% between 1990 and 2000, and 1.2% between 2000 and 2009. During each of these periods, the greatest increases consistently occurred on the Kenai Peninsula (with an average annual increase of 1.1% between 2000 and 2009) and in Anchorage (also with an average annual increase of 1.1% between 2000 and 2009). The components of population increase include the natural increase due to births and net positive domestic and international migration; these trends will likely continue in south central Alaska over the next 40 to 50 yr.

Although the proposed action would add an average of 83 to 113 jobs annually between 2012 and 2017, this increase is considered minor (though positive) since it would amount to less than 5% of total Alaska employment (additional jobs created in the rest of Alaska during the same period would range from 1,400 to 1,890). Likewise, income produced in the region would range from $2.8 million to $3.8 million annually in south central Alaska, which constitutes about 13% of income in Alaska overall.

Employment impacts of oil spills reaching landfall can vary considerably depending upon the total volume of oil reaching land, the land area affected, and the sensitivity of local environmental conditions to oil impacts. The primary impacts of oil spills would most likely fall on such activities as beach recreation, commercial fishing, recreational fishing, and sightseeing. Oil spills reaching land can have both short- and long-term effects on these recreational coastal activities. Past studies (Sorenson 1990) have shown that there could be a one-time seasonal decline in tourist visits of 5% to 15% associated with a major oil spill. Since tourist movement to other coastal areas in the region often offsets a reduction in the number of visits to one area, the associated loss of business tends to be localized. Although an oil spill could occur anywhere in the lease sale area, cleanup-related employment would likely occur in the area directly affected, generally in locations remote from communities. Oil spills will generate only

temporary employment (and population) increases during cleanup operations, because such operations are expected to be of short duration.

Conclusion. The cumulative impacts of future OCS program and ongoing and future non-OCS program activities would be considered beneficial because these activities would increase employment and earnings in the region over the next 40 to 50 yr. The proposed action would add to these beneficial impacts, especially on the Kenai Peninsula and in Anchorage. The incremental impact of the proposed action is expected to be small, however, because the added employment demands are less than 5% of total Alaska employment (see Section 4.4.9.2).

In areas with a large proportion of impact-sensitive industry (such as commercial and recreational fishing), the cumulative impacts of accidental oils spills could be moderate to major, depending on the total volume of oil reaching land, the land area affected, and the sensitivity of local environmental conditions to oil impacts. The incremental impacts of oil spills associated with the proposed action would be small to medium relative to those associated with future OCS program and ongoing and future non-OCS program activities.

4.6.5.2.2 Land Use and Infrastructure. Localized and site-dependent impacts to land use and existing infrastructure are anticipated as a result of the construction of new OCS program oil and gas facilities in Cook Inlet over the next 40 to 50 yr. Impact-producing factors from OCS program activities would include increased vehicular traffic (e.g., helicopter trips); modifications to current land use designations to incorporate new facilities, if they are needed; and some infrastructure expansion. Ongoing non-OCS program activities affecting land use and onshore infrastructure are expected to continue into the foreseeable future. These include offshore construction, onshore construction, and vessel traffic. Where land is largely undeveloped and no established oil and gas infrastructure is present, development could result in land use and infrastructure impacts, such as the conversion of existing land use (e.g., undeveloped, residential, or commercial) to industrial land use to accommodate oil and gas production (MMS 2007e).

Accidental oil releases may occur as a result of both OCS and non-OCS activities, and oil is also released from naturally occurring seeps. The extent of the impacts would depend on the location and size of the releases, but could include stresses of spill response on the community infrastructure, increased traffic to respond to cleanup, and restricted access to particular lands while cleanup is conducted. In general, these releases would be expected to have a temporary impact on land use and infrastructure (MMS 2007c).

Conclusion. Localized and site-dependent impacts to land use and existing infrastructure are anticipated as a result of future OCS and ongoing and future non-OCS program activities in Cook Inlet. These impacts could range from minor to major depending on the nature (extent and duration) of the land use change. Ongoing non-OCS program activities that could affect land use and onshore infrastructure are expected to continue into the foreseeable future (see Section 4.4.10.2). Potential cumulative impacts to land use and infrastructure resulting from accidental oil spills include stresses of spill response on the community infrastructure, increased traffic to respond to cleanup, and restricted access to particular lands while cleanup is conducted.

The extent of land use-related impacts resulting from accidental oil spills and naturally occurring seeps could be minor to major, depending on the location and size of the releases.

4.6.5.2.3 Commercial Fisheries and Recreational Fisheries. Some OCS exploration, development, and production activities have a potential to result in space-use conflicts with fishing activities over the next 40 to 50 yr. In some cases, fishing vessels could be excluded from normal fishing grounds for safety reasons during construction periods or after facilities are in place. In other instances, fishery crews or anglers could decide to avoid certain areas to reduce the potential for gear loss. Such conflicts can sometimes be avoided by conducting construction activities or seismic surveys during closed fishing periods or seasons. A potential also exists for loss of gear or loss of access to fishing areas when floating drill rigs used for exploration are being moved and during other vessel operations.

Offshore construction of platforms or artificial islands could infringe on commercial fishing activities by excluding commercial fishing from adjacent areas due to safety considerations. Drilling discharges associated with exploration activities would likely affect only a small area near drilling platforms or islands, and are not expected to interfere with commercial fishing. During development and production phases, potential effects of such discharges would cease because all muds, cuttings, and produced waters would be discharged into wells instead of being released to open waters. Potential effects of platform construction and operation are expected to be highly localized. Because only a very small area of the individual planning areas would be affected, interference with commercial fisheries is expected to be small.

The impacts of oil and gas development on commercial fishing costs would vary considerably by placement depth. In the Kodiak area, the largest cost increases would occur with structures located in water between 300 and 1,500 m (984 and 4,921 ft) deep, with an annual increase of $43 in costs from a single structure; a single structure in each depth range would increase annual costs by $44. In the Cook Inlet area, the largest increase would come with a single structure placed in water between 150 and 300 m (492 and 984 ft), with an overall increase in costs of $57 per year. Cost impacts in the Gulf of Alaska area would be the largest, at $93 per year with a structure in each depth range, the largest cost increases occurring with a structure placed at between 300 to 1,500 m (984 and 4,921 ft). In each of the areas, single structures would have relatively insignificant impacts compared to fishery revenues in each depth range.

Various non-OCS activities, including State oil and gas programs, dredging and disposal of dredging spoils in OCS waters, logging operations, and commercial or sport fishing activities, could also contribute to cumulative effects on fisheries. Drilling of wells under State oil and gas programs would also require construction of pipelines and artificial islands or platforms in Alaskan waters. Potential effects on fishery resources and on space-use conflicts from State oil and gas activities would be similar to those described above for OCS program oil and gas activities. Dredging and marine disposal activities would involve excavation of nearshore sediments and subsequent disposal in offshore or nearshore areas, thereby disturbing seafloor habitats in some areas and burying benthic organisms that help to support fishery resources.

Logging operations have a potential to contribute to cumulative effects on fishery resources by degrading riverine habitats that are important for salmon reproduction and the rearing of juveniles.

Non-OCS activities, such as State oil and gas development, domestic transportation of oil or refined petroleum products, and commercial shipping, may also result in accidental spills that could affect fisheries within the waters of the south central Alaska region. Fisheries resources could become exposed to oil as a consequence of accidental oil spills, which could cause declines in subpopulations of some species inhabiting the affected planning areas. It is anticipated that there would be no long-term effects on overall fish populations in Alaskan waters as a result of such spills. However, even localized decreases in stocks of fish could have effects on some fisheries by reducing catches or increasing the amount of effort or the distances that must be traveled to obtain adequate catches.

Even if fish stocks are not reduced as a consequence of a spill, specific fisheries could be closed due to actual or perceived contamination of fish or shellfish. It is anticipated that most small to medium spills would have limited effects on fisheries because of the relatively small areas likely to be exposed to high concentrations of hydrocarbons and the short period of time during which oil slicks would persist. In the event of a large spill, commercial, recreational, or subsistence fisheries for shellfish in nearshore subtidal and intertidal areas that become oiled are likely to be affected. Fisheries for shellfish that occur in deeper waters, where oil concentrations would likely be too low to cause direct effects on biota, are less likely to be affected. Regardless, even shellfish from deeper areas could become commercially unacceptable for market due to actual or perceived contamination and tainting.

Oil spills that enter nearshore waters could also damage setnet fisheries, as evidenced by the *Exxon Valdez* oil spill of 1989. While only a relatively small volume of weathered oil entered the lower Cook Inlet region as a result of that spill, the commercial salmon fishery was closed to protect both gear and harvest from possible contamination. Within the Cook Inlet Planning Areas, a spill the size of the assumed largest OCS spill could result in temporary closures to commercial and subsistence setnet fishing until cleanup operations or natural processes reduced oil concentrations to levels considered safe.

Although pelagic fishes would be less likely to be affected than fishes in shallow subtidal or intertidal areas, spilled oil could contaminate gear used for pelagic fishing, such as purse seines and drift nets. A large oil spill before or during the season when such fishing gears are in use could result in closures of some short-period, high-value commercial fisheries in order to protect gear or harvests from potential contamination. Lines from longline fisheries for halibut, Pacific cod, black cod, and other fish species in the Cook Inlet Planning Area could also be affected by oil. Some lines and buoys fouled with small amounts of oil could be unfit for future use. Although it is unlikely that a trawler would be operating in an oiled area, the trawl catches could be contaminated by oil and rendered unfit for consumption and unprofitable if passed through such an area.

Conclusion. The proposed action would represent a small increment to the potential for overall cumulative effects on fisheries in Cook Inlet. Routine OCS program activities would be

unlikely to have cumulative population- or community-level effects on fishery resources because of the limited time frame over which most individual activities would occur; because a small proportion of habitat, relative to similar available habitat, could be affected during a given period; and because of existing stipulations that are in place to avoid impacts to sensitive habitats such as hard bottom areas and topographic features. Non-OCS activities, including State oil and gas development, commercial fishing, and sportfishing, could also contribute to cumulative effects on fisheries. Depending on specific conditions during a large spill, there could be substantial economic losses for commercial fisheries as a consequence of reduced catch, loss of gear, or loss of fishing opportunities during cleanup and recovery periods. Non-OCS sources of spills, including State oil and gas production, have a potential to cause similar effects. The occurrence of a very large spill, such as could occur from a tanker accident in southern Alaskan waters, could have substantially greater effects on fisheries.

4.6.5.2.4 Tourism and Recreation. Platform, pipeline, causeway, and facility construction and vessel traffic could interfere with water-based recreational activities (fishing, boating, sightseeing, cruise ships) and could result in some disruption to land-based activities (hiking, picnicking, hunting, visiting Native communities, camping, wildlife viewing, and sightseeing), depending on the location of recreational activities relative to proposed development; increases in amounts of trash and debris from OCS activities; and possible competition between workers and tourists for local services, such as air transport, hotel accommodations, and other visitor services. Non-OCS activities that could have an impact on tourism and recreation include offshore construction (e.g., State oil and gas development, domestic transportation of oil and gas), onshore construction (e.g., coastal and community development), and vessel traffic (e.g., commercial shipping, recreational boating, military training and testing).

Non-OCS activities and proposed and future OCS activities represent a continuation of existing onshore and offshore oil and gas construction trends close to the Cook Inlet Planning Area. Substantial infrastructure for related oil and gas development already exists in this area, including platforms, exploration and production wells, pipelines to transport oil from offshore platforms to common-carrier pipeline systems onshore, and processing facilities. Therefore, there should not be additional visual disruption for the tourists in these areas. Pipeline construction would present a temporary disruption to tourism and recreation due to workers competing with tourists for short-term housing (hotels) and air transport; aesthetic impacts (visual and auditory) associated with construction sites; and possible temporary prevention of access to some recreational or wilderness areas. In addition, the new pipeline in the Arctic region could create road access into previously undeveloped lands used primarily for subsistence, creating a potential conflict between subsistence practices and recreational hunting or other possible tourist activities.

Oil spills associated with OCS and non-OCS activities, as well as oil from naturally occurring seeps, could also affect recreation and tourism, and could result in both short-term and long-term effects, depending on public perception and reaction. Potential cumulative impacts include direct land impacts (e.g., oil contamination of a national wildlife refuge or recreational

port); aesthetic impacts of the spill and associated cleanup; increased traffic to respond to cleanup operations; and restricted access to particular lands while cleanup is being conducted.

Conclusion. Cumulative impacts on recreation and tourism from future OCS program and ongoing and future non-OCS program activities in Cook Inlet would be minor for most routine activities, with the exception of impacts associated with large oil spills during the peak tourist season, which could be moderate to major (but short-term). The incremental contribution of routine Program activities to cumulative impacts would be small, resulting from small incremental increases in construction and transportation noise and related visual intrusions, potential increases in trash and debris related to these activities, and the potential for a relatively small number of accidental releases (see Section 4.4.12.1).

Oil spills could affect recreation and tourism temporarily in all areas, but would not likely result in long-term effects, depending on public perception and reaction. The magnitude of impacts from an oil spill could range from minor to major, depending on the size, location, and timing of the spill. The greatest impacts would be expected to occur in popular tourist areas during the main tourist season.

4.6.5.2.5 Sociocultural Systems. The area surrounding the Cook Inlet Planning Area is demographically diverse and includes relatively remote Native villages that rely on subsistence harvesting, towns that rely on commercial fishing, and ethnically diverse cities (Section 3.14.1.2). Future non-OCS activities include oil and gas development on State submerged lands, changes in commercial fishing patterns and maritime shipping, and limited industrialization.

The Cook Inlet Planning Area is already the location of offshore oil and gas development. Supporting infrastructure and a trained workforce are already available in relative proximity. As part of this industrial mix, development of the OCS is likely to have minor cumulative impacts relative to development on the Arctic coast. No new shore bases are planned and only one new pipeline is projected under the Program.

Oil spills can cause damage to resources important to subsistence harvesters, affect fish populations important to commercial fishers, and have sociological impacts in affected communities. Most spills projected to result from exploration and development of the OCS would be a relatively minor component of the existing mix of oil and gas development and commercial shipping. However, as the *Exxon Valdez* event has shown, coastal communities are susceptible to sociocultural disruption as the result of large-scale spills that disrupt commercial fishing and subsistence harvesting.

OCS program development could temporarily displace fish and sea mammal populations harvested by subsistence hunters and fishers. Helicopter flights associated with development could disturb nesting and roosting sites of birds that are harvested, and temporarily and locally disturb terrestrial game animals.

Conclusion. Cumulative impacts on sociocultural systems as a result of future OCS and ongoing and future non-OCS activities would be minor to moderate. Important impacting factors include the displacement of fish and sea mammal populations and the disturbance of nesting and roosting sites and terrestrial game animals (e.g., by noise). The contribution of the proposed action to cumulative impacts on sociocultural systems in the Cook Inlet Planning Area would be small because no significant changes are anticipated (see Section 4.4.13.2).

4.6.5.2.6 Environmental Justice. Although no new pipe yards, pipeline landfalls, or gas processing facilities would be built as a result of the proposed 5-yr OCS program, additional offshore construction could include increased noise and traffic, air and water pollution, impacts to residential property values, and land use changes. Much of the Alaska Native population resides in the coastal areas of Alaska. New offshore infrastructure resulting from this program could be located near areas where subsistence hunting occurs. The OCS program would result in levels of infrastructure use and construction similar to what is occurring in south central Alaska. These activities are not expected to expose residents to notably higher risks than currently occur.

Any adverse environmental impacts to fish and mammal subsistence resources from installation of infrastructure and routine operations of these facilities could have disproportionately higher health or environmental impacts to Alaska Native populations. OCS activities could potentially disrupt marine mammal harvests (primarily walrus, seals, and beluga whales) by diverting marine migrations or by causing other behavioral changes such as increased wariness.

Air emissions from onshore facilities and helicopter and vessel traffic traversing coastal areas will be highest in areas containing the greatest amounts of infrastructure. It is assumed that the majority of the activity from the proposed action would occur in deep waters, with offshore air emissions greatest in the coastal areas with the greatest amounts of oil and gas activity, with lesser amounts occurring elsewhere. The effects of the OCS program on air quality have been analyzed in Section 4.4.4.2. This analysis concluded that routine operations associated with the proposed 5-yr program would result in NO_2, SO_2, PM_{10}, and CO levels that are well within the NAAQS. Disproportionate impacts on low-income or minority populations of the inlet would be minor, because coastal effects from offshore activities are expected to be small, based on the established and increasing trend toward movement of oil and gas activities into deeper waters of the inlet.

Oil spill events in the region and related cleanup activities pose the greatest potential for cumulative effects on low-income and minority population groups. It is reasonable to expect that most of these spills will occur in deepwater areas located away from the coast, based on the established trend for oil and gas activity to move into deep waters located for the most part at a substantial distance from the coast. The magnitude of impacts from such spills cannot be predicted, should they contact the coast, and depends on their location, size, and timing. While the location of possible oil spills cannot be determined and while low-income and minority populations are resident in some areas of the coast, in general, the coasts are home to more affluent groups. Low-income and minority groups are not more likely to bear more negative impacts than are other groups.

Conclusion. In the Cook Inlet Planning Area, future OCS program and ongoing and future non-OCS program activities in combination with the effects of onshore and offshore construction, increased marine vessel and helicopter traffic, and land use changes would result in disproportional moderate to major adverse cumulative impacts on low-income and minority populations (especially those dependent on subsistence harvesting and fishing). The incremental contribution of routine Program activities to these impacts would be small (see Section 4.4.14.2).

The incremental impacts of accidental oil spills associated with the proposed action would be small to large, depending on the size, location, and timing of the spill (see Section 4.4.14.2).

4.6.5.2.7 Archeological and Historic Resources. Section 4.4.15.2 discusses the potential impacts from the proposed action (OCS program activities from 2012 to 2017) on archeological and historic resources in the Cook Inlet Planning Area. Cumulative impacts on archeological and historic resources result from the incremental impacts of the proposed action when added to impacts from existing and reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities. Table 4.6.1-2 presents the exploration and development scenario for the Cook Inlet cumulative case (encompassing the proposed action and future OCS program activities). Specific types of impact-producing factors related to OCS program activities considered in this analysis include drilling rig and platform emplacement, pipeline emplacement, new onshore facilities, and oil spills. Non OCS-program activities (e.g., oil and gas industry in State waters) and natural geologic processes such as ice gouging and erosion due to high-energy waves/currents and thermokarst collapse are also considered.

Archeological Resources. Offshore development could result in an interaction between a drilling rig, platform, pipeline, or anchors and an inundated prehistoric site. This direct physical contact with a site could destroy artifacts or site features and could disturb the stratigraphic context of the site. The result would be the loss of archaeological data on prehistoric migrations, settlement patterns, subsistence strategies, and archaeological contacts between northeast Asia and the Americas.

Since 1973, BOEM has required that an archaeological survey be conducted prior to development of mineral leases determined to have potential for cultural resources, including prehistoric archaeological sites. Relative sea-level data, which are used to define the portion of the continental shelf having potential for prehistoric sites, suggest that the portion of the continental shelf shoreward of about the 60-m (200-ft) isobath would have potential for prehistoric sites. Although an archaeological survey would identify most of the cultural resources in the APE for the project and routine operations related to OCS program activities would avoid all known cultural resources, it is likely that impacts to prehistoric resources may have already occurred as a result of non-OCS program activities prior to the implementation of the 1973 archaeological survey requirement.

Onshore development could result in direct physical contact between the construction of new onshore facilities or pipeline trenches and previously unidentified prehistoric sites. This

direct physical contact with a prehistoric site could cause physical damage to or complete destruction of information on the prehistory of the region and North America. Federal and State laws and regulations initiated in the 1960s began requiring archaeological surveys prior to permitting any activity that might disturb a significant archaeological site. Therefore, it can be assumed that, since the introduction of the archaeological resource protection laws, most coastal archaeological sites have been located, evaluated, avoided, or mitigated prior to construction. However, impacts to coastal prehistoric resources may have already occurred as a result of various onshore construction activities prior to enactment of the archaeological resource protection laws.

Trawling activity in Cook Inlet only affects the uppermost portion of the sediment column (Krost et al. 1990). This zone would already be disturbed by natural factors relating to the destructive effects wave and current action (Cook Inlet is a high-energy wave environment; see Section 4.2.3.2.2). Therefore, the effect of trawling on most prehistoric archaeological sites would be minor.

Most channel dredging occurs at the entrances to bays, harbors, and ports. These areas have a high probability for prehistoric archaeological sites, as they are often associated with drowned river valleys, which are known to have a high probability for prehistoric sites. It is assumed that some of the archaeological data that have been lost as a result of dredging have been significant and unique; therefore, the impact to prehistoric archaeological sites as a result of past channel dredging activities has probably been moderate to major. In many areas, the USACE now requires remote-sensing surveys prior to dredging activities to minimize such impacts (Espey, Huston & Associates 1990).

Natural geologic processes such as ice gouging and thermokarst erosion may affect prehistoric archaeological sites associated with Cook Inlet. No specific studies examining the effects of geological processes on archaeological sites have been conducted in Cook Inlet. However, coastal prehistoric sites are exposed to the erosional effects of high-energy waves and thermokarst erosion. These natural processes could cause artifacts to be dispersed and the site context to be disturbed or even completely destroyed, resulting in the loss of archaeological information. Cook Inlet is a high-energy area affected by strong tidal movements. The seafloor of lower Cook Inlet contains characteristics such as lag gravels, sand ribbons, and sand wave fields (MMS 2003a). These features are formed only in areas of high energy. High-energy water movement may have removed the potential for archaeological resources to be present. Additional research is needed to determine the extent of the disturbance. Studies conducted in the Beaufort Sea indicate that seafloor sediments have been affected by ice gouging and by increased river flows resulting from glaciation (Darigo et al. 2007). It is likely that similar processes have operated in Cook Inlet and that they have affected the integrity of archaeological sites. Overall, some loss of data from submerged and coastal prehistoric sites has probably occurred, and will continue to occur, from the effects of natural geologic processes. It is assumed that some of the data lost have been significant and/or unique, resulting in a major level of impact. Additional studies specifically addressing these topics are required.

An accidental oil spill could affect coastal prehistoric archaeological sites, but the direct impact of oil on most sites is uncertain. Protection of such sites during an oil spill requires

specific knowledge of their location, condition, nature, and extent prior to impact; however, the Cook Inlet coastline has not been systematically surveyed for archaeological sites.

Heavy oiling of a coastal area could conceal intertidal sites that may not be recognized until they are inadvertently damaged during cleanup (Whitney 1994). Crude oil may also contaminate organic material used in ^{14}C dating, and although there are methods for cleaning contaminated ^{14}C samples, greater expense is incurred (Dekin et al. 1993). The major source of potential impact from oil spills is the harm that could result from unmonitored shoreline cleanup activities. Unauthorized collecting of artifacts by cleanup crew members is also a concern, albeit one that can be mitigated with effective training and supervision. Damage or loss of significant archaeological information could result from the contact between an oil spill and a prehistoric archaeological site; therefore, cumulatively the level of impacts from oil spills (past, present, and future) to prehistoric archaeological sites ranges from moderate to high.

Historic Resources. Direct physical contact between a routine activity and a shipwreck site could destroy fragile ship remains, such as the hull and wooden or ceramic artifacts, and could disturb the site context. The result would be the loss of archaeological data on ship construction, cargo, and the social organization of the vessel's crew, and the concomitant loss of information on maritime culture for the time period from which the ship dates.

Since 1973, BOEM has required archaeological (historical) surveys be conducted prior to development of mineral leases when a historic-period shipwreck is reported to lie within or adjacent to the lease area. Although an archeological survey would identify most of the cultural resources in the APE for the project and routine operations related to OCS activities would avoid all known cultural resources, it is likely that impacts on historic-period shipwrecks may have already occurred as a result of non-OCS program activities that took place before implementation of the 1973 archaeological survey requirement.

Onshore development could result in direct physical contact between the construction of new onshore facilities or pipeline trenches and previously unidentified historic sites. Federal and State laws and regulations initiated in the 1960s began requiring archaeological surveys prior to permitting any activity that might disturb a significant archaeological site. Therefore, it can be assumed that, since the introduction of the archaeological resource protection laws, most coastal archaeological sites that would have been impacted have been located, evaluated, avoided, or mitigated prior to construction. However, impacts to coastal historic sites may have resulted from onshore construction activities prior to enactment of the archaeological resource protection laws, but the magnitude of this possible impact is impossible to quantify.

Trawling activity in south central Alaska affects only the uppermost portion of the sediment column (Krost et al. 1990). On many wrecks, this zone would already be disturbed by natural factors and would contain only artifacts of low specific gravity which have lost all original context. Therefore, the effect of trawling on most historic shipwreck sites would be minor.

Most channel dredging occurs at the entrances to bays, harbors, and ports. These areas have a high probability for historic shipwrecks. Assuming that some of the data lost have been

unique, the impact on historic sites as a result of past channel dredging activities has probably been moderate to major. In many areas, the USACE now requires remote-sensing surveys prior to dredging activities to minimize such impacts (Espey, Huston & Associates 1990).

Natural geologic processes such as ice gouging and erosion due to high-energy waves/currents and thermokarst collapse affect historic sites in Cook Inlet. No specific studies addressing this topic have been undertaken. Coastal historic sites are exposed to the erosional effects of wave energy and thermokarst erosion, which can cause artifacts to be dispersed and the site context to be disturbed or even completely destroyed. Cook Inlet is a high-energy area affected by strong tidal movements. The seafloor of lower Cook Inlet contains seafloor characteristics such as lag gravels, sand ribbons, and sand wave fields (MMS 2003a). These features are only formed in areas of high energy. High-energy water movement may have removed the potential for historic resources to be present. Additional research is needed to determine the extent of the disturbance. Overall, a significant loss of data from submerged and coastal historic sites may have already occurred from the effects of natural geologic processes. It is assumed that some of the data lost have been significant and/or unique, resulting in a major level of impact. Additional studies specifically addressing these topics are required.

An accidental oil spill could affect a coastal historic site, but the direct impact of oil on most historic sites is uncertain. The primary source of potential impacts from oil spills is unmonitored shoreline cleanup activities (Bittner 1996; see Section 4.4.14.2.2). Unauthorized collecting of artifacts by cleanup crew members is also a concern, albeit one that can be mitigated with effective training and supervision. Damage or loss of significant historic information could result from oil spill cleanup activities; therefore, the cumulative impact of oil spills (past, present, and future) on historic sites could range from moderate to major.

Conclusion. The cumulative impacts of future OCS program and ongoing and future non-OCS program activities on prehistoric and historic archaeological sites in Cook Inlet are currently unknown, but could range from minor to moderate, mainly because activities occurring on the OCS prior to BOEM's survey requirement (in effect since 1973) may already have affected significant archaeological sites. Other important impacting factors that have had, and will continue to have, an impact on both prehistoric and historic archaeological sites are channel dredging and geologic processes, such as ice gouging and erosion due to high-energy waves/currents and thermokarst collapse. Commercial treasure hunting and sport diving may also result in a loss of artifacts at historic-period shipwreck sites. The incremental contribution of routine Program activities is expected to be minor because required archaeological surveys would identify significant cultural resources to be avoided (see Section 4.4.15.2).

Cumulative impacts on prehistoric and historic sites due to accidental oil spills would result mainly from cleanup activities (direct impacts to the sites are uncertain) and could range from moderate to major. The incremental impacts of oil spills associated with the proposed action would be small to medium relative to those associated with future OCS program and ongoing and future non-OCS program activities.

4.6.5.3 Alaska Region – Arctic

4.6.5.3.1 Population, Employment, and Income. Section 4.4.9 discusses the potential impacts from the proposed action (OCS program activities from 2012 to 2017) on population, employment, and income in the Arctic region. Cumulative impacts on these resources result from the incremental impacts of the proposed action when added to impacts from reasonably foreseeable future OCS program activities (there are no existing OCS program activities) and other non-OCS program activities. Specific types of impact-producing factors related to OCS program activities considered in this analysis include total employment and regional income for the North Slope Borough, which corresponds to the Beaufort Sea and Chukchi Sea Planning Areas (described in Section 3.10). Non-OCS program activities affecting the region include employment and earnings related to various other industrial sectors (e.g., construction, manufacturing, services, and State and local government).

The population in the Beaufort Sea and Chukchi Sea Planning Areas is concentrated in Barrow. It increased at an average annual rate of 3.6% between 1980 and 1990, and 2.1% between 1990 and 2000; it decreased by 1.0% between 2000 and 2009. The components of population increase include the natural increase due to births and net positive domestic migration; the population trend is uncertain over the next 50 yr and will likely depend on the availability of jobs. Most communities in the borough have a high percentage of American Indian or Alaska Natives.

Although the proposed action would add an average of 167 to 225 jobs annually between 2012 and 2017, this increase is considered minor (though positive) since it would amount to less than 1% of total Alaska employment (additional jobs created in the rest of Alaska during the same period would range from 2,644 to 3,570). Likewise, income produced in the region would range from $5.6 million to $7.6 million annually in the Arctic region, which constitutes about 50% of income in Alaska overall. Most of the workers directly associated with OCS oil and gas activities would work offshore or onshore in worker enclaves separated from local communities, and most workers will likely commute to work sites from Alaska's larger population centers or from outside the immediate area. While OCS jobs would be available to the local populations in all areas, rural Alaskan employment in the petroleum industry, especially among Alaska Natives, would likely remain relatively low. However, a contingent of Alaska Natives from the Fairbanks area and members of the Doyon Corporation do work in the oil fields of the North Slope, and these jobs are important to them.

Employment impacts of oil spills reaching landfall can vary considerably depending upon the total volume of oil reaching land, the land area affected, and the sensitivity of local environmental conditions to oil impacts. The primary impacts of oil spills would most likely fall on such activities as beach recreation, commercial fishing, recreational fishing, and sightseeing. Oil spills reaching land can have both short- and long-term effects on these recreational coastal activities. Although an oil spill could occur anywhere in the lease sale area, cleanup-related employment would likely occur in the area directly affected, generally in locations remote from communities. The hiring of cleanup workers would have a regional and State of Alaska emphasis. Oil spills will generate only temporary employment (and population) increases during

cleanup operations, because such operations are expected to be of short duration. Employment generated by spills will be a function of the size and frequency of spills.

Conclusion. The cumulative impacts of future OCS program and ongoing and future non-OCS program activities would be considered beneficial because these activities would increase employment and earnings in the region over the next 40 to 50 yr (although rural Alaskan employment in the petroleum industry, especially among Alaska Natives, would likely remain relatively low). The proposed action would add to these beneficial impacts. The incremental impact of the proposed action is expected to be small, however, because the added employment demands are less than 1% of total Alaska employment (see Section 4.4.9.3).

The cumulative impacts of accidental oil spills could be minor to major, depending on the total volume of oil reaching land, the land area affected, and the sensitivity of local environmental conditions to oil impacts. The incremental impacts of oil spills associated with the proposed action would be small to medium relative to those associated with ongoing and future non-OCS program activities.

4.6.5.3.2 Land Use and Infrastructure. Localized and site-dependent impacts to land use and existing infrastructure are anticipated as a result of the construction of new oil and gas facilities in the Beaufort and Chukchi Sea Planning Areas. Impact-producing factors from OCS program activities would include increased vehicular traffic (e.g., helicopter trips); modifications to current land use designations to incorporate new facilities, if they are needed; and some infrastructure expansion.

Ongoing non-OCS program activities that could affect land use and onshore infrastructure are expected to continue into the foreseeable future. These include offshore construction, onshore construction, and vessel traffic. Where land is largely undeveloped and no established oil and gas infrastructure is present, development could result in land use and infrastructure impacts, such as the conversion of existing land use (e.g., undeveloped, residential, or commercial) to industrial land use to accommodate oil and gas production (MMS 2007e).

Accidental oil releases may occur as a result of both OCS and non-OCS activities. The extent of impacts would depend on the location and size of the releases, but could include stresses of spill response on the community infrastructure, increased traffic to respond to cleanup, and restricted access to particular lands while cleanup is conducted. In general, these releases would be expected to have a temporary impact on land use and infrastructure (MMS 2007c).

Conclusion. Localized and site-dependent impacts to land use and existing infrastructure are anticipated as a result of future OCS program and ongoing and future non-OCS program activities in the Beaufort and Chukchi Seas. Impacts from Program activities could range from minor to moderate depending on the nature (extent and duration) of the land use change. Ongoing non-OCS program activities that could affect land use and onshore infrastructure are expected to continue into the foreseeable future.

The extent of land use-related impacts resulting from accidental oil spills could be minor to major, depending on the location and size of the releases.

4.6.5.3.3 Recreational Fisheries. Given the importance of this fishing to local villages in the Arctic region, any impacts from the proposed action may directly affect the local economy by causing declines in salmon availability for harvest. Greater declines in the harvest would lead to greater impacts on local communities. However, it is anticipated that impacts from routine OCS operations would be minor as a result of adherence to mitigation measures and compliance with Federal, State, and local requirements.

The proposed action would represent a small increment to the potential for overall cumulative effects on fishing by local villages in the Arctic region. Routine OCS program activities would be unlikely to have cumulative population- or community-level effects on local fishery resources because of the limited time frame over which most individual activities would occur; because a small proportion of habitat, relative to similar available habitat, could be affected during a given period; and because of existing stipulations that are in place to avoid impacts to sensitive habitats such as hard bottom areas and topographic features. Non-OCS activities, including State oil and gas development, commercial fishing, and sportfishing, could also contribute to cumulative effects on local fisheries.

Depending on specific conditions during a large oil spill, there could be substantial economic losses for commercial fisheries as a consequence of reduced catch, loss of gear, or loss of fishing opportunities during cleanup and recovery periods. Non-OCS sources of spills, including State oil and gas production, have a potential to cause similar effects. The occurrence of a catastrophic spill, such as could occur from a tanker accident, could have substantially greater effects on fisheries.

Conclusion. The future OCS program in combination with ongoing and future non-OCS program activities could result in moderate to major impacts on recreational fisheries in the Arctic region. The incremental contribution of routine Program activities would be small (see Section 4.4.11.3).

The incremental impacts of accidental oil spills associated with the proposed action would be small to large, depending on the size, location, and timing of the spill (see Section 4.4.11.3).

4.6.5.3.4 Tourism and Recreation. Platform, pipeline, causeway, and facility construction and vessel traffic could interfere with water-based recreational activities (fishing, boating, sightseeing, cruise ships); cause some disruption to land-based activities (hiking, picnicking, hunting, visiting Native communities, camping, wildlife viewing, and sightseeing), depending on the location of recreational activities relative to proposed development; increase amounts of trash and debris from OCS activities; and cause possible competition between workers and tourists for local services, such as air transport, hotel accommodations, and other visitor services. Non-OCS activities that could have an impact on tourism and recreation include

offshore construction (e.g., State oil and gas development, domestic transportation of oil and gas), onshore construction (e.g., coastal and community development), and vessel traffic (e.g., commercial shipping, recreational boating, military training and testing).

Non-OCS activities and proposed and future OCS activities represent a continuation of existing onshore and offshore oil and gas construction trends in the Beaufort Sea and Chukchi Sea Planning Areas. Substantial infrastructure for related oil and gas development already exists in both of these areas, including platforms, exploration and production wells, pipelines to transport oil from offshore platforms to common-carrier pipeline systems onshore, and processing facilities; therefore, there should not be additional visual disruption for the tourists in these areas. Pipeline construction would present a temporary disruption to tourism and recreation due to workers competing with tourists for short-term housing (hotels) and air transport; aesthetic impacts (visual and auditory) associated with construction sites; and possible temporary prevention of access to some recreational or wilderness areas. In addition, the new pipeline in the Arctic region could create road access into previously undeveloped lands used primarily for subsistence, creating a potential conflict between subsistence practices and recreational hunting or other possible tourist activities.

Oil spills associated with OCS and non-OCS activities, as well as oil releases from naturally occurring seeps, could also affect recreation and tourism, and could result in both short-term and long-term effects, depending on public perception and reaction. Potential cumulative impacts include direct land impacts (e.g., oil contamination of a National Wildlife Refuge); aesthetic impacts of the spill and associated cleanup; increased traffic to respond to cleanup operations; and restricted access to particular lands while cleanup is being conducted.

Conclusion. Infrastructure changes in the Beaufort Sea and Chukchi Sea Planning Areas would result in moderate to major impacts because they would be noticeable to the recreation and tourism community, as no similar infrastructure yet exists in that region, and competition for accommodations and air transport may slow tourism for a time. The incremental contribution of routine Program activities to cumulative impacts would be relatively large, resulting from large incremental increases in construction and transportation noise and related visual intrusions, potential increases in trash and debris related to these activities, and the potential for a relatively large number of accidental releases (see Section 4.4.12.1).

Oil spills could affect recreation and tourism temporarily in all areas, but would not likely result in long-term effects, depending on public perception and reaction. The magnitude of impacts would depend on the size, location, and timing of the spill. The greatest impacts would be expected to occur in popular tourist areas during the main tourist season (in the summer).

4.6.5.3.5 Sociocultural Systems. Small, primarily Alaska Native communities along the Arctic coast are heavily dependent on subsistence harvesting of sea mammals, fish, and terrestrial fauna. Enclaves of workers at Prudhoe Bay and nearby oil fields are employed by the oil and gas industry. They commute from mostly south-central Alaska, Fairbanks, and States outside of Alaska. For the most part, these two communities (Alaska Native communities and worker enclaves) have had little interaction because of the physical distance that separates them.

The exception is Nuiqsuit. Further development of the oil and gas industry, increases in marine shipping as a result of the diminishing polar ice caps, and the effects of climate change coupled with development of oil and gas resources on the OCS could have cumulative effects on the subsistence harvesting and sociocultural structure of the region.

A primary concern of Alaska Natives is the health and accessibility of sea mammals including whales, walrus, and seals. Warming climatic conditions have resulted in the early retreat of the polar ice pack. Ice flow haulouts used by seals and walrus are thus farther from shore, increasing the effort required for subsistence hunters to harvest them. More ice-free lanes along the coast have resulted in an increase in shipping in the Beaufort and Chukchi Seas, a pattern that is likely to continue. Increased shipping is likely to disturb bowhead and beluga whale migration patterns, already affected by the noise of seismic survey vessels during oil and gas exploration, and to a lesser extent during drilling and operation of wells. The whale harvest is central to Alaska Native culture, both in terms of the food it provides and its association with Native cultural identity and spirituality. Oil and gas exploration and development combined with increased shipping and the effects of climate change would have an adverse cumulative effect on subsistence harvesting.

The construction and operation of linear features such as oil and gas pipelines and roads can deflect migration patterns of terrestrial mammals such as caribou that are an important part of the subsistence harvest. As onshore oil and gas development expands from Prudhoe Bay, Native communities such as Nuiqsut feel increasingly cut off from traditional subsistence resource harvesting areas. To the extent that offshore oil development requires onshore support infrastructure, it contributes to a cumulative negative impact on onshore access to subsistence resources. As the distance between Native communities and oil and gas worker enclaves decreases, the interaction between these two groups is likely to increase, raising the potential for cross-cultural conflicts and changes in traditional culture.

Conclusion. Cumulative impacts on sociocultural systems as a result of future OCS and ongoing and future non-OCS activities would be moderate to major. Important impacting factors include early retreat of the polar ice pack (due to warming climate conditions), increased marine shipping (due to more ice-free lanes along the coast), and increased noise (due to seismic surveys and other oil and gas activities) — all of which disturb sea mammals and their migration patterns. Onshore linear features (e.g., pipelines and roads) affect the migration patterns of terrestrial mammals. Because of the high level of dependence on subsistence harvesting, the incremental contribution of the proposed action to cumulative impacts on sociocultural systems in the Beaufort and Chukchi Seas would be medium to large (see Section 4.4.13.3).

4.6.5.3.6 Environmental Justice. Additional offshore construction under the proposed action could include increased noise and traffic, air and water pollution, impacts on residential property values, and land use changes. Much of the Alaska Native population resides in the coastal areas of Alaska. New offshore infrastructure resulting from this program could be located near areas where subsistence hunting occurs. The proposed 5-year program will result in levels of infrastructure use and construction similar to what has occurred in the south Alaska

region during previous programs. These activities are not expected to expose residents to notably higher risks than currently occur.

Any adverse environmental impacts on fish and mammal subsistence resources could have disproportionately higher health or environmental impacts on Alaska Native populations. OCS activities could potentially disrupt marine mammal harvests (primarily walrus, seals, and beluga whales) by diverting marine migrations or by causing other behavioral changes, such as increased wariness or having to go further from shore because of the diminishing polar ice cap, and whales migrating further from shore or the synergistic effects of all these factors combined.

Air emissions from onshore facilities and helicopter and vessel traffic traversing coastal areas will be highest in areas containing the greatest amounts of infrastructure. It is assumed that the majority of the activity from the proposed 5-yr program will occur in waters no more than 100 m (30 ft) deep, with the most offshore air emissions occurring in the coastal areas with the greatest amounts of oil and gas activity and with fewer emissions occurring elsewhere. The effects of the OCS program on air quality have been analyzed in Section 4.4.4. This analysis concluded that routine operations associated with the proposed 5-year program would result in NO_2, SO_2, PM_{10}, and CO levels that are well within the NAAQS. Coastal effects from offshore activities are expected to be small, based on the established and increasing trend toward movement of oil and gas activities into deeper waters.

Oil spill events in the region, and related cleanup activities, pose the greatest potential for impacts on low-income and minority population groups. It is reasonable to expect that most of these spills would occur in deepwater areas located away from the coast, based on the established trend for oil and gas activities to move into deep waters located for the most part at a substantial distance from the coast. The magnitude of impacts from such spills cannot be predicted, should they contact the coast, and depends on their location, size, and timing. However, according to MMS (2002), the probability that an offshore oil spill occurring and impacting coastal populations is low. While the location of possible oil spills cannot be determined, low-income and minority populations are resident in some areas of the coast. Low-income and minority groups could bear more negative impacts than other population groups.

Conclusion. In the Beaufort and Chukchi Sea Planning Areas, OCS and non-OCS program activities in combination with increased marine traffic and climate change could result in major adverse cumulative impacts on human health and the environment, especially if a large oil spill were to occur, because oil spill contamination of subsistence foods is the main concern regarding potential effects on Native health. Impacts on marine and terrestrial ecosystems in the region (described in Section 4.6.4) could affect subsistence resources, traditional culture, and community infrastructure; indigenous communities that are subsistence-based would likely experience disproportionate, highly adverse environmental and health effects. However, the incremental change due to impacts from Program activities is expected to be negligible to minor.

The incremental impacts of accidental oil spills associated with the proposed action would be small to large, depending on the size, location, and timing of the spill (see Section 4.4.14.3).

4.6.5.3.7 Archeological and Historic Resources. Section 4.4.15.3 discusses the potential impacts from the proposed action (OCS program activities from 2012 to 2017) on onshore and offshore environments in the Beaufort and Chukchi Sea Planning Areas. Cumulative impacts on archeological and historic resources result from the incremental impacts of the proposed action when added to impacts from existing and reasonably foreseeable future OCS program activities (that are not part of the proposed action) and other non-OCS program activities. Table 4.6.1-2 presents the exploration and development scenario for the Arctic region cumulative case (encompassing the proposed action and future OCS program activities). Specific types of impact-producing factors related to OCS program activities considered in this analysis include drilling rig and platform emplacement, pipeline emplacement, new onshore facilities, and oil spills. Non-OCS program activities (e.g., oil and gas industry in State waters) and natural geologic processes such as ice gouging and thermokarst erosion are also considered (see also Section 4.2.2.2).

Archeological Resources. Offshore development could result in an interaction between a drilling rig, platform, pipeline, or anchors and an inundated prehistoric site. This direct physical contact with a site could destroy artifacts or site features and could disturb the stratigraphic context of the site. The result would be the loss of archaeological data on prehistoric migrations, settlement patterns, subsistence strategies, and archaeological contacts between northeast Asia and the Americas.

Since 1973, BOEM has required that an archaeological survey be conducted prior to development of mineral leases determined to have potential for cultural resources, including prehistoric archaeological sites. Relative sea-level data, which are used to define the portion of the continental shelf having potential for prehistoric sites, suggest that the portion of the continental shelf shoreward of about the 60-m (200-ft) isobath would have potential for prehistoric sites. Although an archaeological survey would identify all cultural resources in the APE for the project and routine operations related to OCS program activities would avoid all known cultural resources, it is likely that impacts to prehistoric resources may have already occurred as a result of non-OCS program activities prior to the implementation of the archaeological survey requirement.

Onshore development could result in direct physical contact between the construction of new onshore facilities or pipeline trenches and previously unidentified prehistoric sites. This direct physical contact with a prehistoric site could cause physical damage to or complete destruction of information on the prehistory of the region and North America. Federal and State laws and regulations initiated in the 1960s began requiring archaeological surveys prior to permitting any activity that might disturb a significant archaeological site. Therefore, it can be assumed that, since the introduction of the archaeological resource protection laws, most coastal archaeological sites have been located, evaluated, avoided, or mitigated prior to construction. However, impacts to coastal prehistoric resources may have already occurred as a result of various onshore construction activities prior to enactment of the archaeological resource protection laws.

Trawling activity in the Arctic region affects only the uppermost portion of the sediment column (Krost et al. 1990). This zone would already be disturbed by natural factors relating to

the destructive effects of ice gouging and scouring (see Section 4.2.2). Therefore, the effect of trawling on most prehistoric archaeological sites would be minor.

Most channel dredging occurs at the entrances to bays, harbors, and ports. These areas have a high probability for prehistoric archaeological sites, as they are often associated with drowned river valleys, which are known to have a high probability for prehistoric sites. It is assumed that some of the archaeological data that have been lost as a result of dredging have been significant and unique; therefore, the impact to prehistoric archaeological sites as a result of past channel dredging activities has probably been moderate to major. In many areas, the USACE now requires remote-sensing surveys prior to dredging activities to minimize such impacts (Espey, Huston & Associates 1990).

Natural geologic processes such as ice gouging and thermokarst erosion have caused and will continue to cause a significant loss of prehistoric archaeological data in the Alaska region. For example, ice gouges on the Beaufort Sea shelf can create a furrow up to 67 m (220 ft) wide and 4 m (13 ft) deep; however, the average ice gouge is about 8 m (26 ft) wide and 0.5 m (1.6 ft) deep (Barnes 1984). Coastal prehistoric sites are exposed to the destructive effects of thermokarst erosion. These natural processes would cause artifacts to be dispersed and the site context to be disturbed or even completely destroyed, resulting in the loss of archaeological information. Overall, a significant loss of data from submerged and coastal prehistoric sites has probably occurred, and will continue to occur, from the effects of natural geologic processes. It is assumed that some of the data lost have been significant and/or unique, resulting in a major level of impact.

An accidental oil spill could affect coastal prehistoric archaeological sites, but the direct impact of oil on most sites is uncertain. Protection of such sites during an oil spill requires specific knowledge of their location, condition, nature, and extent prior to impact; however, the Beaufort and Chukchi Sea coastlines have not been systematically surveyed for archaeological sites.

Heavy oiling of a coastal area could conceal intertidal sites that may not be recognized until they are inadvertently damaged during cleanup (Whitney 1994). Crude oil may also contaminate organic material used in ^{14}C dating, and, although there are methods for cleaning contaminated ^{14}C samples, greater expense is incurred (Dekin et al. 1993). The major source of potential impact from oil spills is the harm that could result from unmonitored shoreline cleanup activities. Unauthorized collecting of artifacts by cleanup crew members is also a concern, albeit one that can be mitigated with effective training and supervision. Damage or loss of significant archaeological information could result from the contact between an oil spill and a prehistoric archaeological site; therefore, the cumulative impact from oil spills to prehistoric archaeological sites could range from moderate to major.

Historic Resources. Direct physical contact between a routine activity and a shipwreck site could destroy fragile ship remains, such as the hull and wooden or ceramic artifacts, and could disturb the site context. The result would be the loss of archaeological data on ship construction, cargo, and the social organization of the vessel's crew, and the concomitant loss of information on maritime culture for the time period from which the ship dates.

Since 1973, BOEM has required archaeological (historical) surveys be conducted prior to development of mineral leases when a historic-period shipwreck is reported to lie within or adjacent to the lease area. Although an archeological survey would identify all cultural resources in the APE for the project and routine operations related to OCS activities would avoid all known cultural resources, it is likely that impacts to historic-period shipwrecks may have already occurred as a result of non-OCS program activities that took place before implementation of the 1973 archaeological survey requirement.

Onshore development could result in direct physical contact between the construction of new onshore facilities or pipeline trenches and previously unidentified historic sites. Federal and State laws and regulations initiated in the 1960s began requiring archaeological surveys prior to permitting any activity that might disturb a significant archaeological site. Therefore, it can be assumed that, since the introduction of the archaeological resource protection laws, most coastal archaeological sites that would have been impacted have been located, evaluated, avoided, or mitigated prior to construction. However, impacts to coastal historic sites may have resulted from onshore construction activities prior to enactment of the archaeological resource protection laws.

Trawling activity in the Alaska subregion only affects the uppermost portion of the sediment column (Krost et al. 1990). On many wrecks, this zone would already be disturbed by natural factors and would contain only artifacts of low specific gravity which have lost all original context. Therefore, the effect of trawling on most historic shipwreck sites would be minor.

Most channel dredging occurs at the entrances to bays, harbors, and ports. These areas have a high probability for historic shipwrecks. Assuming that some of the data lost have been unique, the impact to historic sites as a result of past channel-dredging activities has probably been moderate to major. In many areas, the USACE now requires remote-sensing surveys prior to dredging activities to minimize such impacts (Espey, Huston & Associates 1990).

Natural geologic processes such as ice gouging and thermokarst erosion may cause a loss of historic data in the Beaufort and Chukchi Seas (see study conducted in the Beaufort Sea by Darigo et al. [2007]). For example, ice gouges on the Beaufort Sea shelf can create furrows up to 67 m (220 ft) wide and 4 m (13 ft) deep; however, the average ice gouge is about 8 m (26 ft) wide and 0.5 m (1.6 ft) deep (Barnes 1984). Darigo et al. (2007) suggest that areas close to islands and the shore may be protected from the effects of ice gouging. Coastal historic sites are exposed to the erosional effects of wave energy and thermokarst erosion, which would cause artifacts to be dispersed and the site context to be disturbed or even completely destroyed. No specific studies have examined the effect of geological processes on site integrity. Overall, a significant loss of data from submerged and coastal historic sites may have already occurred from the effects of natural geologic processes. It is possible that some of the data lost may have been significant and/or unique, resulting in a major level of impact. Additional studies are needed to assess the effect of geological processes on cultural resources.

An accidental oil spill could affect a coastal historic site, but the direct impact of oil on most historic sites is uncertain. The primary source of potential impact from oil spills is

unmonitored shoreline cleanup activities (Bittner 1996; see Section 4.4.15.3.2). Unauthorized collecting of artifacts by cleanup crew members is also a concern, albeit one that can be mitigated with effective training and supervision. Damage or loss of significant historic information could result from oil spill cleanup activities; therefore, the cumulative impact from oil spills (past, present, and future) on historic sites could range from moderate to major.

Conclusion. The cumulative impacts of future OCS program and ongoing and future non-OCS program activities on prehistoric and historic archaeological sites in the Beaufort and Chukchi Seas are currently unknown, but could range from minor to moderate, mainly because activities occurring on the OCS prior to BOEM's survey requirement (in effect since 1973) may already have affected significant archaeological sites. Other important impact-producing factors that likely have had, and will continue to have, an impact on both prehistoric and historic archaeological sites are channel dredging and geologic processes, such as ice gouging and thermokarst erosion. Commercial treasure hunting and sport diving may also result in a loss of artifacts at historic-period shipwreck sites. The incremental contribution of routine Program activities is expected to be small because required archaeological surveys would identify significant cultural resources to be avoided (see Section 4.4.15.3).

Cumulative impacts on prehistoric and historic sites due to accidental oil spills would result mainly from cleanup activities (direct impacts to the sites are uncertain) and could range from moderate to major. The incremental impacts of oil spills associated with the proposed action would be small to medium relative to those associated with future OCS program and ongoing and future non-OCS program activities.

4.6.6 Cumulative Impacts Summary Tables

The cumulative impacts are incremental contributions of routine Program activities for resources in the GOM, Cook Inlet Planning Area, and Arctic region are summarized in Tables 4.6.6-1, 4.6.6-2, and 4.6.6-3.

TABLE 4.6.6-1 Summary of Cumulative Impacts and Incremental Contributions of the Proposed Action, GOM

	Cumulative Impact				Incremental Contribution			
Resource	Negligible	Minor	Moderate	Major	Small	Medium	Large	Comments
Water Quality			X		X			
Air Quality		X	X		X			
Acoustic Environment		X	X	X	X	X	X	Magnitude of cumulative impacts depends on the ambient acoustic conditions and the nature and combination of OCS and non-OCS program activities taking place.
Coastal and Estuarine Habitat			X	X	X			
Marine Benthic Habitat		X			X			
Essential Fish Habitat		X			X			Magnitude of cumulative impacts depends on size of affected EFH. Impacts from OCS activities would be limited by specific lease stipulations.
Marine Mammals		X	X		X			
Terrestrial Mammals		X	X		X			
Marine and Coastal Birds			X		X			
Fish		X	X		X			
Reptiles		X	X		X			
Invertebrates and Lower Trophic Levels			X		X			

TABLE 4.6.6-1 (Cont.)

Resource	Cumulative Impact				Incremental Contribution			Comments
	Negligible	Minor	Moderate	Major	Small	Medium	Large	
Areas of Special Concern		X			X			
Population, Employment, and Income		X			X			Cumulative impacts would be considered beneficial because past, present, and foreseeable future activities would generally increase employment and earnings in the region over the next 40 to 50 yr. The proposed action would add to these beneficial impacts.
Land Use and Infrastructure		X	X	X	X			The magnitude of cumulative impacts depends on the extent and duration of land use change.
Tourism and Recreation			X	X	X			Cumulative impacts minor for most routine activities except for large oil spills occurring during the peak tourist season (which could result in major impacts).
Commercial and Recreational Fishing		X	X		X			
Sociocultural Systems		X			X			
Environmental Justice		X	X		X			
Archeological and Historic Resources		X	X		X			Incremental contribution from routine Program activities expected to be small because required archaeological surveys would identify significant resources to be avoided.

TABLE 4.6.6-2 Summary of Cumulative Impacts and Incremental Contributions of Proposed Action, Cook Inlet Planning Area

	Cumulative Impact				Incremental Contribution			
Resource	Negligible	Minor	Moderate	Major	Small	Medium	Large	Comments
Water Quality		X	X		X			Cumulative impacts may lessen with time since oil and gas production is currently on the decline.
Air Quality		X	X		X			
Acoustic Environment		X	X	X	X	X	X	Magnitude of cumulative impacts depends on the ambient acoustic conditions and the nature and combination of OCS and non-OCS program activities taking place.
Coastal and Estuarine Habitat			X	X	X			
Marine Benthic Habitat		X			X			
Essential Fish Habitat		X	X		X			Magnitude of cumulative impacts depends on size of affected EFH. Impacts from OCS activities would be limited by specific lease stipulations.
Marine Mammals		X	X		X			
Terrestrial Mammals		X	X		X			
Marine and Coastal Birds		X	X		X			Magnitude of cumulative impacts depends on nature and duration of activities that could reduce bird survival and productivity.
Fish		X			X			

TABLE 4.6.6-2 (Cont.)

Resource	Cumulative Impact				Incremental Contribution			Comments
	Negligible	Minor	Moderate	Major	Small	Medium	Large	
Invertebrates and Lower Trophic Levels			X		X			
Areas of Special Concern		X			X			
Population, Employment, and Income		X			X			Cumulative impacts would be considered beneficial because past, present, and foreseeable future activities would generally increase employment and earnings in the region over the next 40 to 50 yr. The proposed action would add to these beneficial impacts.
Land Use and Infrastructure		X	X	X	X			The magnitude of cumulative impacts depends on the extent and duration of land use change.
Tourism and Recreation		X			X			
Commercial and Recreational Fishing		X	X		X			
Sociocultural Systems		X	X		X			
Environmental Justice		X	X		X			
Archeological and Historic Resources		X	X		X			Incremental contribution from routine Program activities expected to be small because required archaeological surveys would identify significant resources to be avoided.

TABLE 4.6.6-3 Summary of Cumulative Impacts and Incremental Contributions of Proposed Action, Arctic Region

	Cumulative Impact				Incremental Contribution			
Resource	Negligible	Minor	Moderate	Major	Small	Medium	Large	Comments
Water Quality			X		X	X		
Air Quality		X	X		X			
Acoustic Environment		X	X	X	X	X	X	Magnitude of cumulative impacts depends on the ambient acoustic conditions and the nature and combination of OCS and non-OCS program activities taking place.
Coastal and Estuarine Habitat			X	X	X			
Marine Benthic Habitat		X			X			
Essential Fish Habitat		X	X		X			Magnitude of cumulative impacts depends on size of affected EFH. Impacts from OCS activities would be limited by specific lease stipulations.
Marine Mammals		X	X		X			
Terrestrial Mammals		X	X		X			
Marine and Coastal Birds		X	X		X			Magnitude of cumulative impacts depends on nature and duration of activities that could reduce bird survival and productivity. Population-level effects could result from the tendency of large numbers of individuals of some bird species to concentrate in certain coastal arctic locations.
Fish		X	X		X			

TABLE 4.6.6-3 (Cont.)

Resource	Cumulative Impact				Incremental Contribution			Comments
	Negligible	Minor	Moderate	Major	Small	Medium	Large	
Invertebrates and Lower Trophic Levels		X	X		X			
Areas of Special Concern		X			X			Lease stipulations applied at the lease sale stage could minimize the potential for cumulative impacts.
Population, Employment, and Income		X			X			Cumulative impacts would be considered beneficial because past, present, and foreseeable future activities would generally increase employment and earnings in the region over the next 40 to 50 yr. The proposed action would add to these beneficial impacts.
Land Use and Infrastructure		X	X	X	X			The magnitude of cumulative impacts depends on the extent and duration of land use change.
Commercial and Recreational Fishing			X	X	X			
Tourism and Recreation		X					X	
Sociocultural Systems		X	X			X	X	
Environmental Justice		X	X			X	X	
Archeological and Historic Resources		X	X		X			Incremental contribution from routine Program activities expected to be small because required archaeological surveys would identify significant resources to be avoided.

4.7 REFERENCES

Abraham, K.S., 2005, "Battering of US GOM Structures Brings Discussion of Standards," *World Oil* 226(11):51–60.

Adcroft, A., R. Hallberg, J.P. Dunne, B.L. Samuels, J.A. Galt, C.H. Barker, and D. Payton, 2010, "Simulations of Underwater Plumes of Dissolved Oil in the Gulf of Mexico," *Geophysical Research Letters* 37:L18605.

Addison, R., J. Dower, J. Hall, and I. Jordan, 2004, *Report of the Expert Panel on Science Issues Related to Oil and Gas Activities, Offshore British Columbia*, the Royal Society of Canada, Ottawa, Feb. Available at http://www.rsc.ca/documents/fullreportEN.pdf. Accessed July 15, 2011.

ADEC (Alaska Department of Environmental Conservation), 2007a, *Summary of Oil and Hazardous Substance Spills by Subarea (July 1, 1995 to June 30, 2005)*, Oct.

ADEC, 2007b, *Alaska's Nonpoint Source Water Pollution Control Strategy*, Feb. 15.

ADEC (Alaska Department of Environmental Conservation), 2010, *Alaska's Final 2010 Integrated Water Quality Monitoring and Assessment Report*, July 15.

ADFG (Alaska Department of Fish and Game), 2011, "Cook Inlet Area," Alaska Department of Fish and Game. Available at http://www.adfg.alaska.gov/index.cfm?adfg=ByAreaSubsistence CookInlet.main. Accessed August 31, 2011.

ADN (Anchorage Daily News), 2009, *Redoubt Ash Dusts Anchorage, Airport Closed*, March 29.

ADNR (Alaska Department of Natural Resources), 1999, *Beaufort Sea Areawide 1999 Oil and Gas Lease Sale, Finding of the Director, State of Alaska*, Division of Oil and Gas, Department of Natural Resources, Anchorage, Alaska, July 15.

ADNR, 2009a, *Cook Inlet Areawide Oil and Gas Lease Sale, Final Finding of the Director, January 20, 2009*, Division of Oil and Gas.

ADNR, 2009b, *Final Best Interest Finding: 2009 Cook Inlet Areawide Oil and Gas Lease Sale*. Available at http://www.dog.dnr.state.ak.us/oil/products/publications/cookinlet/ciaw_2009_ final_finding/ciaw09-ff_toc.html. Accessed April 26, 2011.

ADNR, 2009c, *Alaska Oil and Gas Report, Annual Report of the Division of Oil and Gas*, Nov.

ADNR, 2011, *Red Dog Mine*, Division of Mining, Land, and Water, April 25. Available at http://dnr.alaska.gov/mlw/mining/largemine/reddog/index.htm. Accessed July 12, 2011.

Alexander-Bloch, B., 2010, "Vietnamese-American Fishers Fight for Oil Spill Claim Approval," *nola.com.* Available at http://www.nola.com/news/gulf-oil-spill/index.ssf/2010/12/vietnamese-american_fishermen.html. Accessed December 15, 2010.

Allen, B.N., and R.P. Angliss, 2010, *Alaska Marine Mammal Stock Assessments, 2009*, NOAA Technical Memorandum NMFS-AFSC-206, National Marine Fisheries Service, Alaska Fisheries Science Center, Seattle, Washington, Feb.

Allen, B.N., and R.P. Angliss, 2011, *Alaska Marine Mammal Stock Assessments, 2010*, NOAA, Technical Memorandum NMFS-AFSC-223, National Oceanic and Atmospheric Administration, National Marine Fisheries Service, Alaska Fisheries Science Center, Seattle, Wash., May. REPLACES ALLEN AND ANGLISS 2010.

AMAP (Arctic Monitoring and Assessment Programme), 1997, "Acidification and Arctic Haze," in *Arctic Pollution Issues: A State of the Arctic Environment Report*. Available at http://iwlearn.net/iw-projects/Msp_112799491731/reports/arctic-pollution-issues-a-state-of-the-arctic-environment-report-1997. Accessed September 5, 2011.

AMAP, 2007, *Arctic Oil and Gas 2007*. Available at http://www.amap.no/oga/. Accessed May 10, 2011.

AMAP, 2010, Asssessment 2007: *Oil and Gas Activities in the Arctic – Effects and Potential Effects*, Vol. 2. Available at http://www.amap.no/oga/. Accessed May 10, 2011.

Amstrup, S.C., 1993, "Human Disturbances of Denning Polar Bears in Alaska," *Arctic* 46:246–250.

Anchorage Daily News, 2010, "Shell, Native Corporations Team Up for Offshore Operations," *adn.com*, Jan. 13.

Anderson, C.M., and R.P. LaBelle, 2000, "Update of Comparative Occurrence Rates for Offshore Oil Spill," *Spill Science and Technology* 65(6):303–321.

Anderson, D.E., O.J. Rongstead, and W.R. Mytton, 1986, "The Behavioral Response of a Red-Tailed Hawk to Military Training Activity," *Raptor Research* 20: 65–68.

Anderson, D.E., O.J. Rongstead, and W.R. Mytton, 1989, "Response of Nesting Red-Tailed Hawks to Helicopter Overflights," *The Condor* 91: 296–299.

Anderson, J., 2010, *Corps of Engineers Alaska District 2011 Dredging Projects*, Alaska District Corps of Engineers, Elmendorf Air Force Base, Alaska, Oct. 27.

Andre, M., M. Terada, and Y. Watanabe, 1997, *Sperm Whale (*Physeter macrocephalus*) Behavioral Response after the Playback of Artificial Sounds*, Reports of the International Whaling Commission 47, SC/48/NA 13:499–504.

Antoine, J.W., 1972, "Structure of the Gulf of Mexico," in *Contributions on the Geological and Geophysical Oceanography of the Gulf of Mexico*, Vol. 3, Texas A&M University Oceanographic Studies, R. Resak and V.J. Henry (eds.), Gulf Publishing Company, Houston, Texas.

API (American Petroleum Institute), 1989, *Effects of Offshore Petroleum Operations on Cold Water Marine Mammals: A Literature Review*, Washington, D.C.

APTA (American Public Transportation Association), *2010, 2010 Public Transportation Fact Book*. Available at http://www.apta.com/RESOURCES/STATISTICS/Pages/transitstats.aspx. Accessed April 2010.

Archer, A.W., and M.S. Hubbard, 2003, "Highest Tides of the World," *Special Paper – Geological Society of America* 370:151–173.

Arctic Council and IASC (International Arctic Science Committee), 2005, *Arctic Climate Impact Assessment*, Cambridge University Press, New York, N.Y.

Asplin, M.G., J.V. Lukovich, and D.G. Barber, 2009, "Atmospheric Forcing of the Beaufort Sea Ice Gyre: Surface Pressure Climatology and Sea Ice Motion," *Journal of Geophysical Research* 114:C00A06.

Astakhov, A.S., A.A. Bosin, A.N. Kolesnik, D.A. Korshunov, K. Crane, and E.A. Logvina, 2010, "Geological Investigations in the Chukchi Sea and the Adjacent Areas of the Arctic Ocean during the RUSALCA-2009 Expedition," *Russian Journal of Pacific Geology* 4(6):532–537.

Atauz, A.D., W. Bryant, T. Jones, and B. Phaneuf, 2006, *Mica Shipwreck Project: Deepwater Archaeological Investigation of a 19th Century Shipwreck in the Gulf of Mexico*, OCS Study MMS 2006-072, Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La.

Atchinson, A.D., P.W. Sammarco, and D.A. Brazeau, 2008, "Genetic Connectivity in Corals on the Flower Garden Banks and Surrounding Oil/Gas Platforms, Gulf of Mexico." *Journal of Experimental Marine Biology and Ecology* 365: 1–12.

Auerbach, N.A., M.D. Walker, and D.A. Walker. 1997. Effects of Roadside Disturbance on Substrate and Vegetation Properties in Arctic Tundra. Ecol. Appl. 7(1):218-235.

Aurell, J., and B.K. Gullett, 2010, "Aerostat Sampling of PCDD/PCDF Emissions from the Gulf Oil Spill In Situ Burns," *Environ. Sci. Tech.* 44(24):9431–9437.

Austin, D., et al., 2002, *Social and Economic Impacts of Outer Continental Shelf Activities on Individuals and Families*, OCS Study MMS 2002-022, prepared by University of Arizona, Bureau of Applied Research in Anthropology.

Avens, L., J. Braun-McNeill, S. Epperly, and K.J. Lohmann, 2003, "Site Fidelity and Homing Behavior in Juvenile Loggerhead Sea Turtles (*Caretta caretta*)," *Marine Biology* 143:211–220.

Bak, R.P.M., 1987, "Effects of Chronic Oil Pollution on a Caribbean Coral Reef," *Marine Pollution Bulletin* 18:534–539.

Baker, J.D., C.L. Littnan, and D.W. Johnston, 2006, "Potential Effects of Sea Level Rise on the Terrestrial Habitats of Endangered and Endemic Megafauna in the Northwestern Hawaiian Islands," *Endangered Species Research* 4:1–10.

Barber, D.G., R. Galley, M.G. Asplin, R. De Abreu, K.-A. Warner, M. Puc´ko, M. Gupta, S. Prinsenberg, and S. Julien, 2009, "Perennial Pack Ice in the Southern Beaufort Sea Was Not as It Appeared in the Summer of 2009," *Geophysical Research Letters* 36:L24501, doi:10.1029/2009GL041434.

Barnes, P.W., 1984, "Ice Gouging Characteristics and Processes," pp. 185–212 in *The Beaufort Sea: Ecosystems and Environments*, P.W. Barnes, D.M. Schell, and E. Reimnitz (eds.), Academic Press, New York, N.Y.

Barnes, P.W., and E. Reimnitz, 1979, *Ice Gouge Obliteration and Sediment Redistribution Event, 1977-1978, Beaufort Sea, Alaska*, Open File Report 79-848, U.S. Geological Survey.

Bartol, S.M., J. Musick, and M. Lenhardt, 1999, "Auditory Evoked Potentials of the Loggerhead Sea Turtle (*Caretta caretta*)," *Copeia* 99(3):836–840.

Bartol, S.M., and D.R. Ketten, 2006, "Turtle and Tuna Hearing," pp. 98–103 in *Sea Turtle and Pelagic Fish Sensory Biology: Developing Techniques to Reduce Sea Turtle Bycatch in Longline Fisheries*, NOAA Technical Memorandum NMFS-PIFSC-7, December.

Bartsch-Winkler, S., 1982, *Physiography, Texture, and Bedforms in Knik Arm, Upper Cook Inlet, Alaska during June and July, 1980*, U.S. Geological Survey Open File Report 82-464.

Battelle, 2001, *An Initial Survey of Aquatic Invasive Species Issues in the Gulf of Mexico Region*, Version 4.0, EPA 855-R-00-003, submitted by Battelle, Coastal Resources and Ecosystems Management, New Orleans, La., to U.S. Environmental Protection Agency, Gulf of Mexico Program, Stennis Space Center, Mississippi, August 31. Available at http://nis.gsmfc.org/pubs/Initial%20Survey%20of%20Invasive%20Species.pdf. Accessed September 6, 2011.

Baust, J.G., A.H. Benton, and G.D. Aumann, 1981, "The Influence of Off-shore Platforms on Insect Dispersal and Migration," *Journal of Economic Entomology* 27: 23–25.

Bean, D., 2005, *Past and Present Deepwater Contour-Current Bedforms at the Base of the Sigsbee Escarpment, Northern Gulf of Mexico*, dissertation, Texas A&M University, College Station, Texas, Aug.

Becker, E.L., E.E. Cordes, S.A. Macko, and C.R. Fisher, 2009, "Importance of Seep Primary Production to *Lophelia pertusa* and Associated Fauna in the Gulf of Mexico," *Deep Sea Research Part I* 56:786–800.

Behrenfeld, M.J., R.T. O'Malley, D.A. Siegel, C.R. McClain, J.L. Sarmiento, G.C. Feldman, A.J. Milligan, P.G. Falkowski, R.M. Letelier, and E.S. Boss, 2006, "Climate-Driven Trends in Contemporary Ocean Productivity," *Nature* 444:752–755.

Berner, J., 2011, *Integrating Health Impact Assessments into the Federal Environmental Impact Process with a Focus on Alaska Native Communities*. Prepared by the Alaska Inter-Tribal Council for the Robert Wood Johnson Foundation. Available at http://www.rwjf.org/files/research/63350.pdf. Accessed July 20, 2011.

Bhatia, R., 2007, "Protecting Health Using an Environmental Impact Assessment: A Case Study of San Francisco Land Use Decisionmaking," *American Journal of Public Health*, Vol. 97, No. 3, March.

Bierman, V.J., Jr., S.C. Hinz, D. Justić, D. Scavia, J.A. Veil, K. Satterlee, III, M.E. Parker, and S. Wilson, 2007, "Predicted Impacts from Offshore Produced Water Discharges on Hypoxia in the Gulf of Mexico," prepared for 2007 SPE E&P Environmental and Safety Conference, Galveston, Texas, March 5–7.

Billings, R., and D. Wilson, 2004, *Data Quality Control and Emissions Inventories of OCS Oil and Gas Production Activities in the Breton Area of the Gulf of Mexico, Final Report*, OCS Study MMS 2004-071.

Bittner, J.E., 1996, "Cultural Resources and the *Exxon Valdez* Oil Spill: An Overview," *American Fisheries Society Symposium* 18:814–818.

Black, B.B., M.W. Collopy, H.F. Percival, A.A. Tiller, and P.G. Bohall, 1984, *Effect of Low-Level Military Training Flights on Wading Bird Colonies in Florida. Tech. Rep. 7*, Florida Cooperative Fish and Wildlife Research Unit, University of Florida, Gainesville.

Blackwell, S.B., J.W. Lawson, and M.T. Williams, 2004, "Tolerance of Ringed Seals (*Phoca hispida*) to Impact Pipe-Driving and Construction Sounds at an Oil Production Island," *The Journal of the Acoustical Society of America* 115(5):2346–2357.

Blake, E.S., E.N. Rappaport, and C.W. Landsea, 2007, *The Deadliest, Costliest, and Most Intense United States Tropical Cyclones from 1851 to 2006*, Technical Memorandum NWS TPC-5, National Weather Service, National Hurricane Center, Miami, Fla.

BLM (Bureau of Land Management), 2002, *Renewal of the Federal Grant for the Trans-Alaska Pipeline System Right-of-Way, Final Environmental Impact Statement*, BLM/AK/PT-03/005+2880+990, BLM, Anchorage, Alaska.

BLM, 2007, *Northeast National Petroleum Reserve-Alaska (NPR-A) Draft Supplemental Integrated Activity Plan/Environmental Impact Statement*, Bureau of Land Management, Alaska State Office, Anchorage. Available at http://www.blm.gov/ak/st/en/prog/planning/npra_general/ne_npra.html.

Blum, M.D., and H.H. Roberts, 2009, "Drowning of the Mississippi Delta due to Insufficient Sediment Supply and Global Sea-level Rise," *Nature Geoscience*, Vol. 2, July.

Blumer, M., H.L. Sanders, J.F. Grassie, and G.R. Hampson, 1971, "A Small Oil Spill," *Environment* 13:2–12.

Boatman, M.C., and J. Peterson, 2000, *Oceanic Gas Hydrate Research and Activities Review*, MMS Gulf of Mexico OCS Region, OCS Report MMS 2000-017, Feb.

Bodkin, J.L., B.E. Ballachey, T.A. Dean, A.K. Fukuyama, S.C. Jewett, L. McDonald, D.H. Monson, C.E. O'Clair, and G.R. VanBlaricom, 2002, "Sea Otter Population Status and the Process of Recovery from the 1989 'Exxon Valdez' Oil Spill," *Marine Ecology Progress Series* 241:237–253.

Boehm, P.D., J.M. Neff, and D.S. Page, 2007, "Assessment of Polycyclic Aromatic Hydrocarbon Exposure in the Waters of Prince William Sound after the *Exxon Valdez* Oil Spill: 1989-2005," *Marine Pollution Bulletin* 54:339–356.

BOEM, unpublished, *Draft Programmatic EIS for the Geological and Geophysical Exploration of Mineral and Energy Resources in the Gulf of Mexico*, Bureau of Ocean Energy Management, Gulf of Mexico Region, New Orleans, La.

BOEMRE (Bureau of Ocean Energy Management, Regulation, and Enforcement), 2008, *Beaufort Sea and Chukchi Sea Planning Area Oil and Gas Lease Sales 209, 212, 217 and 221, Draft Environmental Impact Statement*, OCS EIS/EA BOEMRE 2008-0055.

BOEMRE, 2010a, *Chukchi Sea Planning Area, Oil and Gas Lease Sale 193 in the Chukchi Sea, Alaska, Draft Supplemental Environmental Impact Statement*, OCS EIS/EA, BOEMRE 2010-034, September.

BOEMRE, 2010b, *Installations and Removals – Offshore Production Facilities in Federal Water*, BOEMRE TIMS GOM and Pacific databases. Available at http://www.boemre.gov/stats/PDFs/OCSPlatformActivity.pdf. Accessed April 21, 2011.

BOEMRE, 2010c, *Draft Programmatic Environmental Impact Statement for the Geological and Geophysical Exploration of Mineral Resources in the Gulf of Mexico Outer Continental Shelf*.

BOEMRE, 2010d, *Revised Offshore Environmental Cost Model (OECM): Guide to Cost Benefit Calculations*, prepared by Industrial Economics, Dec.

BOEMRE, 2010e, *Alaska Outer Continental Shelf Chukchi Sea Planning Area Statoil USA E&P Inc. Geological & Geophysical Permit 2010 3D/2D Seismic Acquisition Chukchi Sea, Alaska Environmental Assessment*, OCS EIS/EA BOEMRE 2010-020, Bureau of Ocean Energy Management, Regulation and Enforcement, Alaska OCS Region, Office of Leasing and Environment, June.

BOEMRE, 2011a, *Gulf of Mexico OCS Oil and Gas Lease Sale: 2011, Western Planning Area Lease Sale 218, Draft Supplemental Environmental Impact Statement*, OCS EIS/EA, BOEMRE 2011-018. Available at http://www.gomr.boemre.gov/PDFs/2011/2011-018.pdf. Accessed April 22, 2011.

BOEMRE, 2011b, "Catastrophic Spill Event Analysis: High-Volume, Extended-Duration Oil Spill Resultilng from Loss of Well Control on the Gulf of Mexico Outer Continental Shelf," Appendix B in *Gulf of Mexico OCS Oil and Gas Lease Sale: 2011, Western Planning Area Lease Sale 218, Draft Supplemental Environmental Impact Statement*, OCS EIS/EA BOEMRE 2011-018, Bureau of Ocean Energy Management, Regulation and Enforcement, Gulf of Mexico Region, New Orleans, La.

BOEMRE, 2011c, *2012-2017 Five-Year Scoping Meeting for Programmatic Environmental Impact Statement Bureau of Ocean Energy Management, Regulation and Enforcement, U.S. Department of the Interior, Kaktovik, Alaska*, transcript reported by Mary A. Vavrik, Midnight Sun Court Reporters, February 23.

BOEMRE, 2011d, *2012-2017 Five-Year Scoping Meeting for Programmatic Environmental Impact Statement Bureau of Ocean Energy Management, Regulation and Enforcement, U.S. Department of the Interior, Nuiqsut, Alaska*, transcript reported by Mary A. Vavrik, Midnight Sun Court Reporters, February 22.

BOEMRE, 2011e, *2012-2017 Five-Year Scoping Meeting for Programmatic Environmental Impact Statement Bureau of Ocean Energy Management, Regulation and Enforcement, U.S. Department of the Interior, Wainwright, Alaska*, transcript reported by Mary A. Vavrik, Midnight Sun Court Reporters, February 15.

BOEMRE, 2011f, *2012-2017 Five-Year Scoping Meeting for Programmatic Environmental Impact Statement Bureau of Ocean Energy Management, Regulation and Enforcement, U.S. Department of the Interior, Barrow, Alaska*, transcript reported by Mary A. Vavrik, Midnight Sun Court Reporters, February 21.

BOEMRE, 2011g, *Fact Sheet: Renewable Energy on the Outer Continental Shelf*. Available at http://www.boemre.gov/offshore/RenewableEnergy/PDFs/BOEMREAlternativeEnergyfactsheet.pdf. Accessed July 20, 2011.

BOEMRE, 2011h, *Initial Interim Policy Proposed Projects*. Available at http://www.boemre.gov/offshore/RenewableEnergy/InitialInterimPolicyProposedProject.htm. Accessed July 20, 2011.

BOEMRE, 2011i, *Gulf of Mexico OCS Oil and Gas Lease Sale 216/222 Draft Supplemental Environmental Impact Statement*, OCS EIS/EA BOEMRE 2011-027, Bureau of Ocean Energy Management, Regulation and Enforcement, Gulf of Mexico OCS Region.

BOEMRE, 2011j, *Gulf of Mexico Region: Offshore Statistics by Water Depth*. Available at www.gomr.boemre.gov/homepg/fastfacts/WaterDepth/WaterDepth.html. Accessed July 18, 2011.

BOEMRE, 2011k, *Chukchi Sea Planning Area, Oil and Gas Lease Sale 193 in the Chukchi Sea, Alaska, Final Supplemental Environmental Impact Statement*, OCS EIS/EA, BOEMRE 2011-041, August.

BOEMRE, 2011l, *Gulf of Mexico OCS Oil and Gas Lease Sale: 2011, Western Planning Area Lease Sale 218, Final Supplemental Environmental Impact Statement*, OCS EIS/EA BOEMRE 2011-034, Bureau of Ocean Energy Management, Regulation and Enforcement, Gulf of Mexico OCS Region.

BOEMRE, 2011m, *Coastal Impact Assistance Program (CIAP).* Available at http://www.boemre.gov/offshore/CIAPmain.html. Accessed August 31, 2011.

BOEMRE, 2011n, *Seismic Water Bottom Anomalies Map Gallery (and Figure 4).* Available at http://www.boemre.gov/offshore/mapping/SeismicWaterBottomAnomolies.htm. Accessed September 4, 2011.

Boehm, P.D., 2001, *ANIMIDA Phase I: Arctic Nearshore Characterization and Monitoring of the Physical Environment in the Northstar and Liberty Development Areas*, Final Report, OCS Study MMS 2001-104, prepared by Arthur D. Little, Inc., Cambridge, Mass., for Minerals Management Service, Alaska Region, Anchorage, Alaska.

Bohnsack, J.A., 1989, "Are High Densities of Fishes at Artificial Reefs the Result of Habitat Limitation or Behavioral Preference?" *Bulletin of Marine Science* 44:631–645.

Bolam, S.G., and H.L. Rees, 2003, "Minimizing Impacts of Maintenance Dredged Material Disposal in the Coastal Environment: A Habitat Approach," *Environmental Management* 32(2):171–188.

Bonsal, B.R., and B. Kochtubajda, 2009, "An Assessment of Present and Future Climate in the Mackenzie Delta and the Near-Shore Beaufort Sea Region of Canada," *International Journal of Climatology* 29(12):1780–1795.

Boston Consulting Group, 2010, *Batteries for Electric Cars: Challenges, Opportunities, and the Outlook to 2020*. Available at http://www.bcg.com/documents/file36615.pdf. Accessed January 2010.

Born, E.W., F.F. Riget, R. Dietz, and D. Andriashek, 1999, "Escape Responses of Hauled Out Ringed Seals (*Phoca hispida*) to Aircraft Disturbance," *Polar Biology* 21:171–178.

Bouma, A.H., 1981, *Submarine Topography and Physiography of Lower Cook Inlet*, U.S. Geological Survey Open File Report 81-1335.

Bouma, A.H., and M.A. Hampton, 1986, "Environmental Geology," in *Geologic Studies of the Lower Cook Inlet Cost No. 1 Well, Alaska Outer Continental Shelf*, L.B. Magoon (ed.), U.S. Geological Survey Bulletin 1596.

Bouma, A.H., and H.H. Roberts, 1990, "Northern Gulf of Mexico Continental Slope," *Geo-Marine Letters* 10:177–181.

Bouma, A.H., M.A. Hampton, J.W. Whitney, and W.G. Noonan, 1978a, *Physiography of Lower Cook Inlet, Alaska*, U.S. Geological Survey Open File Report 78-728, Aug.

Bouma, A.H., M.A. Hampton, T.P. Frost, M.E. Torreson, R.C. Orlando, and J.W. Whitney, 1978b, *Bottom Characteristics of Lower Cook Inlet, Alaska*, U.S. Geological Survey Open File Report 78-236.

Bowles, A.E., B. Smultea, B. Würsig, D.P. DeMaster, and D. Palka, 1994, "Relative Abundance and Behavior of Marine Mammals Exposed to Transmissions from the Heard Island Feasibility Test," *Journal of the Acoustical Society of America* 96(4):2469–2484.

Bowman, T.D., R.A. Stein, and K.T. Scribner, 2000, "Glaucous Gull Predation of Goslings on the Yukon-Kuskokwim Delta, Alaska," *Condor* 106: 288–298.

BP Exploration (Alaska), Inc., 1998a, *Part 55 Permit Application for the BP Exploration (Alaska) Inc. Liberty Development Project*, Anchorage, Alaska, Jan.

BP Exploration (Alaska), Inc., 1998b, *Part 55 Permit Application for the BP Exploration (Alaska) Inc. Northstar Development Project*, Anchorage, Alaska, Jan.

Brabets, T.P., G.L. Nelson, J.M. Dorova, and A.M. Milner, 1999, *Water Quality Assessment of the Cook Inlet Basin, Alaska — Environmental Setting*, Water Resources Investigation Report 99-4025, U.S. Geological Survey, Anchorage, Alaska.

Braddock, J.F., J.E. Lindstrom, and R.C. Price, 2003, "Weathering of a Subarctic Oil Spill over 25 years: the Caribou-Poker Creeks Research Watershed Experiment," *Cold Regions Science and Technology* 36(1-3):11–23.

Braddock, J., K. Gannon, and B. Rasley, 2004, *Petroleum Hydrocarbon-Degrading Microbial Communities in Beaufort-Chukchi Sea Sediments*, OCS Study MMS 2004-061, University of Alaska, Fairbanks, Alaska.

Bradner, T., 2011, *LNG Plant Closure Heightens Concern about Gas*, Alaska Journal of Commerce, Feb. 18. Available at http://www.alaskajournal.com/stories/021811/oil_lpchcag.shtml. Accessed July 18, 2011.

Brannon, E.L., T.P. Quinn, R.P. Whitman, A.E. Nevissi, R.E. Nakatani, and C.D. McAuliffe, 1986, "Homing of Adult Chinook Salmon after Brief Exposure to Whole and Dispersed Crude Oil," *Transactions of the American Fisheries Society* 115:823–827.

Brooke, S., and C.M. Young, 2009, "In Situ Measurement of Survival and Growth of *Lophelia pertusa* in the Northern Gulf of Mexico," *Marine Ecology Progress Series* 397:153–161.

Brooke, S.D., M.W. Holmes, and C.M. Young, 2009, "Sediment Tolerance of Two Different Morphotypes of the Deep-Sea Coral *Lophelia pertusa* from the Gulf of Mexico," *Marine Ecology Progress Series* 390:137–144.

Brooks, D.A., 1983, "The Wake of Hurricane Allen in the Western Gulf of Mexico," *Journal of Physical Oceanography* 13:117–129.

Brooks, D.A., 1984, "Current and Hydrographic Variability in the Northwestern Gulf of Mexico," *Journal of Geophysical Research* 89(C5):8022–8032.

Brooks, J.M., and C.P. Giammona, 1991, *Mississippi-Alabama Continental Shelf Ecosystem Study Data Summary and Synthesis, Volume II: Technical Narrative*, OCS Study 91-0063, MMS, Gulf of Mexico OCS Region, New Orleans, La.

Brown, B.T., G.S. Mills, C. Powels, W.A. Russell, G.D. Therres, and J.J. Pottie, 1999, "The Influence of Weapons-Testing Noise on Bald Eagle Behavior," *Journal of Raptor Research*, 33: 227–232.

Brown, J., 2005, *ANIMIDA Task 2: Hydrocarbon and Metal Characterization of Sediments, Bivalves and Amphipods in the ANIMIDA Study Area*, Final Report, OCS Study MMS 2004-024, submitted by Exponent, Inc., Maynard, Mass., to Minerals Management Service, Alaska Outer Continental Shelf Region, Anchorage, Alaska. Available at http://www.alaska.boemre.gov/reports/2004Reports/2004_024/ANIMIDA%20Task%202%20Final%20Report.pdf. Accessed June 24, 2011.

Brown, E.D., B.L. Norcross, and J.W. Short, 1996, "An Introduction to Studies on the Effects of the Exxon Valdez Oil Spill on Early Life History Stages of Pacific Herring, *Clupea Pallasi*, in Prince William Sound, Alaska," *Canadian Journal of Fisheries and Aquatic Sciences* 53:2337–2342.

Bryant, W.R., and J.Y. Liu, 2000, "Chapter 3: Geology," in *Deepwater Gulf of Mexico Environmental and Socioeconomic Data Search and Literature Synthesis, Volume I: Narrative Report*, OCS Study MMS 2000-049, prepared by Continental Shelf Associates, Inc. for Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La.

Bryant, W.R., J. Lugo, C. Cordova, and A. Salvador, 1991, "Physiography and Bathymetry," in *The Gulf of Mexico Basin*, A. Salvador (ed.), Geological Society of America, *The Geology of North America* Vol. J, pp. 13–30.

Buckstaff, K.C., 2004, "Effects of Watercraft Noise on the Acoustic Behavior of Bottlenose Dolphins, *Tursiops truncatus*, in Sarasota Bay, Florida," *Marine Mammal Science* 20:709–725.

Bue, B.G., S. Sharr, and J.E. Seeb, 1998, "Evidence of Damage to Pink Salmon Populations Inhabiting Prince William Sound, Alaska, Two Generations after the Exxon Valdez Oil Spill," *Transactions of the American Fisheries Society* 127:35–43.

Buist, I., R. Belore, D. Dickins, D. Hackenberg, A. Guarino and Z. Wang, 2008, *Empirical Weathering Properties of Oil in Ice and Snow*, OCS study, MMS 2008-033, Anchorage, Alaska.

Burgess, R.M., 2000, "Arctic Fox," *The Natural History of an Arctic Oil Field*, pp. 159–178, J.C. Truett and S.R. Johnson (eds). Academic Press, San Diego, CA.

Burns, J.J., and K.J. Frost, 1979, *Natural History and Ecology of the Bearded Seal, Erignathus barbatus*, Environ. Assess. Alaskan Cont. Shelf, Final Rep. Princ. Invest., NTIS PB 85-200939, NOAA, Juneau, Alaska.

Burwell, M., 2011, e-mail from Burwell (BOEMRE, Anchorage, Alaska) to B.T. Verhaaren (Argonne National Laboratory, Argonne, Ill.).

California Energy Commission, undated a, *Consumer Energy Center: Choices at Home*. Available at http://www.consumerenergycenter.org/home/. Accessed August 20, 2011.

California Energy Commission, undated b, *Consumer Energy Center: Water Heaters*. Available at http://www.consumerenergycenter.org/home/appliances/waterheaters.html. Accessed August 20, 2011.

California Energy Commission, undated c, *Consumer Energy Center: Stoves, Ranges and Ovens*. Available at http://www.consumerenergycenter.org/home/appliances/ranges.html. Accessed August 20, 2011.

Calkins, D.G., E. Becker, T.R. Spraker, and T.R. Loughlin, 1994, "Impacts on Steller Sea Lions," pp. 119–139.in *Marine Mammals and the* Exxon Valdez, Academic Press, San Diego, Calif.

Calleson, C.S., and R.K. Frohlich, 2007, "Slower Boat Speeds Reduce Risks to Manatees," *Endangered Species Research* 3:295–304.

Cameron, M., and P. Boveng, 2009, *Habitat Use and Seasonal Movements of Adult and Sub-adult Bearded Seals*, Alaska Fisheries Science Center Quarterly Report October November December 2009. Available at http://www.afsc.noaa.gov/Quarterly/ond2009/OND09feature.pdf. Accessed March 17, 2011.

Cameron, R.D., W.T. Smith, R.G. White, and B. Griffith, 2002, "Section 4: The Central Arctic Caribou Herd," pp. 38–45 in *Arctic Refuge Coastal Plain Terrestrial Wildlife Research Summaries*, D.C. Douglas, P.E. Reynolds, and E.B. Rhodes (eds.), Biological Science Report USGS/BRD/BSR-2002-0001, U.S. Geologic Survey, Biological Resources Division.

Camilli R., C.M. Reddy, D.R. Yoerger, B.A. S. Van Mooy, M.V. Jakuba, J.C. Kinsey, C.P. McIntyre, S.P. Sylva and J.V. Maloney, 2010, "Tracking Hydrocarbon Plume Transport and Biodegradation at Deepwater Horizon," *Science* 330:201–204.

Carmack, E., R. Macdonald, R. Perkin, F. McLaughlin, and R. Pearson, 1995, "Evidence for Warming of Atlantic Water in the Southern Canadian Basin of the Arctic Ocean: Results from the Larsen-93 Expedition," *Geophysical Research Letters* 22(9):1061–1064.

Carney, R.S., 1997, *Workshop on Environmental Issues Surrounding Deepwater Oil and Gas Development*, Final Report, OCS Study MMS 98-0022, Minerals Management Service, Gulf of Mexico Outer Continental Shelf Region, New Orleans, La.

Carretta, J.V., K.A. Forney, E. Leson, K. Martien, M.M. Muto, M.S. Lowry, J. Barlow, J. Baker, B. Hanson, D. Lynch, L. Carswell, R.L. Brownell, Jr., J. Robbins, D.K. Matilla, K. Ralls, and M.C. Hill, 2011, *U.S. Pacific Marine Mammal Stock Assessments: 2010*, NOAA-TM-NMFS-SWFSC-476, National Oceanic and Atmospheric Administration, National Marine Fisheries Service, Southwest Fisheries Science Center. Available at http://www.nmfs.noaa.gov/pr/pdfs/sars/po2010.pdf. Accessed August 1, 2011.

Casale, P., D. Freggi, D. Basso, C. Vallini, and R. Argano, 2007, "A Model of Area Fidelity, Nomadism, and Distribution Patterns of Loggerhead Sea Turtles (*Caretta caretta*) in the Mediterranean Sea," *Marine Biology* 152(5):1039–1049.

Ceresana Research, 2009, *Market Study: Bioplastics*, June. Available at http://www.ceresana.com/en/market-studies/plastics/bioplastics/. Accessed August 21, 2011.

Chang, Y.L., and L.Y. Oey, 2010, "Why Can Wind Delay the Shedding of Loop Current Eddies?" *Journal of Physical Oceanography* 40(11):2481–2495.

Church, R.A., and D.J. Warren, 2008, *Viosca Knoll Wreck: Discovery and Investigation of an Early Nineteenth Century Sailing Ship in 2,000 feet of Water*, OCS Study MMS 2008-018, Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La.

Church, J., J.M. Gregory, P. Huybrechts, M. Kuhn, K. Lambeck, M.T. Nhuan, D. Qin, and P.L. Woodworth, 2001, *Changes in Sea Level, in Climate Change 2001: The Scientific Basis, Contribution of Working Group I to the Third Assessment Report of the Intergovernmental Panel on Climate Change*, J.T. Houghton et al. (eds.), pp. 639–693, Cambridge University Press, New York, N.Y.

CIBSE (Chartered Institution of Building Services Engineers), undated, "Indicative Life Expectancy for Building Services Plant, Equipment and Systems." Available at http://www.cibse.org/pdfs/newOOMtable1.pdf. Accessed August 21, 2011.

Clark, C.E., and J.A. Veil, 2009, *Produced Water Volumes and Management Practices in the United States*, ANL/EVS/R-09/1, prepared for the U.S. Department of Energy, Office of Fossil Energy, National Environmental Technology Laboratory, Environmental Science Division, Argonne National Laboratory, Argonne, Ill., September.

Clausen, C.J., and J.B. Arnold III, 1975, "Magnetic Delineation of Individual Shipwreck Sites; A New Control Technique," *Bull. of the Texas Archaeological Soc.* 46:69-86.

Claypool, G.E., et al., 1980, "Biogenic and Thermogenic Origins of Natural Gas in Cook Inlet Basin, Alaska," *American Association of Petroleum Geologists Bull*. 64(6), Aug.

Clean Edge, Inc. and Co-op America, 2008, *Utility Solar Assessment (USA) Study: Reaching Ten% Solar by 2025*, June. Available at http://www.cleanedge.com/reports/reports-solarUSA2008.php.

Clough, C., 2011, *Fault Data for the Cook Inlet*, GIS data transmittal from C. Clough, Senior GIS tech, Kenai Peninsula Borough, GIS Division, Soldotna, Alaska, to E. Zvolanek, Argonne National Laboratory.

Coastal Response Research Center, 2010, *Deepwater Horizon Dispersant Use Meeting Report*, University of New Hampshire, Durham, N.H.

Cochrane, J.D., and F.J. Kelly, 1986, "Low-Frequency Circulation on the Texas-Louisiana Continental Shelf," *Journal of Geophysical Research* 91(C9):10645–10659.

Coleman, J.M., and D.B. Prior, 1988, "Mass Wasting on Continental Margins," *Ann. Rev. Earth Planet. Sci.* 16:101–119.

Coleman, J.M., H.H. Roberts, and W.R. Bryant, 1991, "Late Quaternary Sedimentation," in *The Gulf of Mexico Basin*, A. Salvador (ed.), Geological Society of America, *The Geology of North America* Vol. J, pp. 325–352.

Collier, T.K., C.A. Krone, M.M. Krahn, J.E. Stein, S. Chan, and U. Varanasi, 1996, "Petroleum Exposure and Associated Biochemical Effects in Subtidal Fish after the *Exxon Valdez* Oil Spill," *American Fishery Society Symposium* 18:671–683.

Combellick, R., and W.E. Long, 1983, *Geologic Hazards in Southeastern Alaska, an Overview: State of Alaska*, Alaska Report of Investigations 83-17, Division of Geological and Geophysical Surveys.

Combellick, R.A., R.D. Reger, and C.J. Nye, 1995, *Geologic Hazards in and near Proposed State of Alaska Oil and Gas Lease Sale 85A (Cook Inlet)*, Public Data File 95-36, Alaska Department of Natural Resources, Nov.

Comiso, J.C., 2002, "A Rapidly Declining Perennial Sea Ice Cover in the Arctic," *Geophysical Research Letters* 29(20):1956.

Comiso, J.C., 2003, "Warming Trends in the Arctic from Clear Sky Satellite Observations," *Journal of Climate* 16(21):3498–3510.

Comiso, J., J. Yang, S. Honjo, and R.A. Krishfield, 2003, "Detection of Change in the Arctic Using Satellite and In Situ Sata," *Journal of Geophysical Research* 108(C12).

Conlan, K., and R.G. Kvitek, 2005, "Recolonization of Soft-Sediment ice Scours on an Exposed Arctic Coast," *Marine Ecology Progress Series* 286:21–42.

Continental Shelf Associates, Inc., 1992, *Analysis of Potential Effects of Oil Spilled from Texaco's Proposed Pipeline on the Biota of the East Flower Garden, West Flower Garden, Rankin, and MacNeil Banks*, prepared for Texaco, New Orleans, La.

Continental Shelf Associates, Inc., 1994, *Analysis of Potential Effects of Oil Spilled from Proposed Structures Associated with Oryx's High Island Block 384 Unit on the Biota of the East Flower Garden Bank and on the Biota of Coffee Lump Bank*, prepared for Oryx Energy Company, Dallas, Texas.

Continental Shelf Associates, Inc., 1997, *Gulf of Mexico Produced Water Bioaccumulation Study, Definitive Component*, prepared for the Offshore Operators Committee, New Orleans, La.

Continental Shelf Associates, Inc., 2004a, *Final Report: Gulf of Mexico Comprehensive Synthetic Based Muds Monitoring Program, Volume 1: Technical*.

Continental Shelf Associates, Inc., 2004b, *Explosive Removal of Offshore Structures — Information Synthesis Report*, OCS Study MMS 2003-070, Minerals Management Service, Gulf of Mexico Outer Continental Shelf Region, New Orleans, La.

Continental Shelf Associates, Inc., 2004c, *Gulf of Mexico Comprehensive Synthetic Based Muds Monitoring Program*, Technical Report, Vol. 1, prepared for the Synthetic Based Muds Research Group.

Continental Shelf Associates, Inc., 2004d, *Geological and Geophysical Exploration for Mineral Resources on the Gulf of Mexico Outer Continental Shelf Final Programmatic Environmental Assessment*, OCS EIS/EA MMS 2004-054, prepared for Minerals Management Service, Gulf of Mexico OCS Region, New Orleans. La., July.

Continental Shelf Associates, Inc., 2006, *Effects of Oil and Gas Exploration and Development at Selected Continental Slope Sites in the Gulf of Mexico*, Volume I: Executive Summary, OCS Study MMS 2006-044, Minerals Management Service, Gulf of Mexico Outer Continental Shelf Region, New Orleans, La.

Continental Shelf Associates, Inc., and Texas A&M University, Geochemical and Environmental Research Group, 2001, *Mississippi/Alabama Pinnacle Trend Ecosystem Monitoring, Final Synthesis Report*, USGS/BR 2001-0007 prepared for U.S. Geological Survey, Biological Resources Division, and OCS Study MMS 2001-080 prepared for Minerals Management Service, Gulf of Mexico Outer Continental Shelf Region, New Orleans, La.

Cooper, C., G.Z. Forristall, and T.M. Joyce, 1990, "Velocity and Hydrographic Structure of Two Gulf of Mexico Warm-Core Rings," *Journal of Geophysical Research* 95(C2):1663–1679.

Cooke, S.J., and I.G. Cowx, 2006, "Contrasting Recreational and Commercial Fishing: Searching for Common Issues to Promote Unified Conservation of Fisheries Resources and Aquatic Environments," *Biological Conservation* 128:93–108.

Costello, J.A., 1985, *Tsunamis: Hazard Definition and Effects on Facilities*, U.S. Geological Survey Open File Report 85-533.

Cox, T.M., T.J. Ragen, A.J. Read, E. Vos, R.W. Baird, K. Balcomb, J. Barlow, J. Caldwell, T. Cranford, L. Crum, A. D'Amico, G.D. Spain, A. Fernandez, J. Finneran, R. Gentry, W. Gerth, F. Gulland, J. Hildebrand, D. Houser, T, Hullar, P.D. Jepson, D. Ketten, C.D. MacLeod, P. Miller, S. Moore, D.C. Mountain, D. Palka, P. Ponganis, S. Rommel, T. Rowles, B. Taylor, P. Tyack, D. Wartzok, R. Gisiner, J. Mead, and L. Benner, 2006, "Understanding the Impacts of Anthropogenic Sound on Beaked Whales," *Journal of Cetacean Research and Management* 7(3):177–187.

Coyne, J.M., and J.J. Dollar, 2005, "Shell Pipeline's Response and Repairs after Hurricane Ivan," *Proc. Offshore Technology Conference*, Houston, Texas, OTC Paper No. 17734.

Crane, N.L., and K. Lashkari, 1996, "Sound Production of Gray Whales Along Their Migration Route, a New Approach to Signal Analysis," *Journal of the Acoustical Society of America* 100(3):1878–1886.

Craig et al., 1985, *Geologic Report for the Beaufort Sea Planning Area, Alaska: Regional Geology, Petroleum Geology, Environmental Geology*, OCS Report MMS 85-0111, Dec.

Crouse, D.T., L.B. Crowder, and H. Caswell, 1987, "A Stage-Based Population Model for Loggerhead Sea Turtles and Implications for Conservation," *Ecology* 68:1412–1423.

Crout, R.L., 2009, "Oil and Gas Platform Ocean Current Profile Data from the Northern Gulf of Mexico," *Marine Technology Society Journal* 43(2):13–20.

Cruz, A.M., and E. Krausmann, 2008, "Damage to Offshore Oil and Gas Facilities Following Hurricanes Katrina and Rita: An Overview," *Journal of Loss Prevention in the Process Industries* 21(6):620–626.

Cudahy, E., and W.T. Ellison, 2002, *A Review of the Potential for In Vivo Tissue Damage by Exposure to Underwater Sound*, white paper report for the Department of Navy, Washington, D.C. Available at http://www.dymedso.ca/pdf/Lung%20resonant%20frequency.pdf. Accessed July 12, 2011.

Culbertson, J.B., I. Valiela, M. Pickart, E.E. Peacock, and C.M. Reddy, 2008, "Long-Term Consequences of Residual Petroleum on Salt Marsh Grass," *Journal of Applied Ecology* 45(4):1284–1292.

Curry, T., and E. Murphy, 1995, "Impacts of Aircraft Disturbance on Reproductive Success of Thick-Billed Murres: Major Threat or Minor Stressor," *Pacific Seabirds* 22(1): 28.

Daggett et al., 2006, *Alternative Fuels and Their Potential Impact on Aviation*, NASA Technical Memorandum 2006-214365, October. Available at http://gltrs.grc.nasa.gov/reports/2006/TM-2006-214365.pdf. Accessed August 20, 2011.

Dalen, J., and G.M. Knutse, 1986, *Scaring Effects in Fish and Harmful Effects on Eggs, Larvae and Fry by Offshore Seismic Explorations*. Symposium on Underwater Acoustics, Halifax.

Dahlheim, M.E., 1987, *Bio-Acoustics of the Gray Whale (Eschrichtius robustus)*, Ph.D. Thesis. Vancouver, B.C.: University of British Columbia 315 pp.

Dahlin, J., et al., 1994, *Recovery of Mangrove Habitats at the Vesta Bella Spill Site*, Hazmat Report 95-3, National Oceanic Atmospheric Administration, Hazardous Materials Response and Assessment Division.

Darigo, N., O. Mason, and P. Bowers, 2007, *Review of Geological/Geophysical Data and Core Analysis to Determine Archaeological Potential of Buried Landforms, Beaufort Sea Shelf, Alaska*, OCS Study MMS 2007-004, prepared by Northern Land Use Research, Inc., URS Corporation, and GeoArch Alaska for MMS, Alaska OCS Region.

Dau, J.R., and R.D. Cameron, 1986, "Effects of a Road System on Caribou Distribution and Calving," *Rangifer* Special Edition 1:95–101.

Davis, R.A., D.H. Thompson, and C.I. Malme, 1998, *Environmental Assessment of Seismic Exploration on the Scotian Shelf*, Canada/Nova Scotia Offshore Petroleum Board, Halifax, Nova Scotia.

Davis, R.W., W.E. Evans, and B. Würsig (eds.), 2000, *Cetaceans, Sea Turtles and Seabirds in the Northern Gulf of Mexico: Distribution, Abundance and Habitat Associations, Volume II: Technical Report*, U.S. Geological Survey, Biological Resources Division, USGS/BRD/CR-1999-0006 and OCS Study MMS 2000-002, Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La.

Day, J., N. Psuty, and B. Perez, 2000, "The Role of Pulsing Events in the Functioning of Coastal Barriers and Wetlands: Implications for Human Impact, Management and the Response to Sea Level Rise," in *Concepts and Controversies in Tidal Marsh Ecology*, M. Weinstein and D. Kreeger (eds.), Kluwer Academic Publishers, Dordrecht.

Day, R.H., 1998, *Predator Populations and Predation Intensity on Tundra-Nesting Birds in Relation to Human Development*. Prepared by ABR, Inc., Fairbanks, AK, for Northern Alaska Ecological Services, U.S Fish and Wildlife Service, Fairbanks, AK.

Day, R.H., and D.A. Nigro, 1999, *Status and Ecology of Kittlitz's Murrelet in Prince William Sound, 1996–1998*. *Exxon Valdez* Oil Spill Restoration Project 98142, Final Report No. 435.

Day, R.H., S.M. Murphey, J.A. Wiens, G.D. Hayward, E.J. Harner, and B.E. Lawhead, 1997a, "Effects of the *Exxon Valdez* Oil Spill on Habitat Use by Birds Along the Kenai Peninsula, Alaska," *The Condor* 99: 728–742.

Day, R.H., S.M. Murphy, J.A. Wiens, G.D. Hayward, E.J. Harner, and L.N. Smith, 1997b, "Effects of the *Exxon Valdez* Oil Spill on Habitat Use by Birds in Prince William Sound, Alaska." *Ecological Applications* 7: 593–613.

Day, R.H., D.A. Nigro, and A.K. Prichard, 2000b, "At-Sea Habitat Use by the Kittlitz's Murrelet *Brachyramphus brevirostris* in Nearshore Waters of Prince William Sound, Alaska," *Marine Ornithology* 28: 105–114.

de Gouw, J.A., et al., 2011, "Organic Aerosol Formation Downwind from the Deepwater Horizon Oil Spill," *Science* 331:1295–1299.

Dean, T.A., and S.C. Jewett, 2001, "Habitat-Specific Recovery of Shallow Subtidal Communities following the *Exxon Valdez* Oil Spill," *Ecological Applications* 11:1456–1471.

Dekin, A.A., Jr., M.S. Cassell, J.I. Ebert, E. Camilli, J.M. Kerley, M.R. Yarborough, P.A. Stahl, and B.L. Turcy, 1993, Exxon Valdez *Oil Spill Archaeological Damage Final Report*, Contract No. 53-0109-1-00325, U.S. Forest Service.

Delany, D.K., T.G. Grubb, P. Beier, L.L. Pater, and M.H. Reiser, 1999, "Effects of Helicopter Noise on Mexican Spotted Owls," *Journal of Wildlife Management* 63: 60–76.

Derksen, D.V., K.S. Bollinger, D. Esler, K.C. Jensen, E.J. Taylor, M.W. Miller, and M.W. Weller, 1992, *Effects of Aircraft on Behavior and Ecology of Molting Black Brant Near Teshekpuk Lake, Alaska. Final Report*. U.S. Department of the Interior, U.S Fish and Wildlife Service, Anchorage, AK.

Derraik, J.G.B., 2002, "The Pollution of the Marine Environment by Plastic Debris: a Review," *Marine Pollution Bulletin* 44: 842–852.

Det Norske Veritas, 2007, *Pipeline Damage Assessment from Hurricanes Katrina and Rita in the Gulf of Mexico*, Report No. 44814183, MMS.

DeWald, O., 1980, "Severe Storm and Hurricane Impacts along the Gulf and Lower Atlantic Coasts," in *Environmental Information on Hurricanes, Deepwater Technology, and Mississippi Delta Mudslides in the Gulf of Mexico, Section III*, Bureau of Land Management Open File Report 80-02, New Orleans, La.

DF Dickens Associates, Ltd., 2004, *Advancing Oil Spill Response in Ice-Covered Waters*, prepared for Prince William Sound Oil Spill Recovery Institute, Cordova, Alaska, and U.S. Arctic Research Commission, Arlington, Virginia, and Anchorage Alaska, March.

DFO (Department of Fisheries and Oceans), 2004, *Review of Scientific Information on Impacts of Seismic Sound on Fish, Invertebrates, Marine Turtles and Marine Mammals*, Department of Fisheries and Oceans, Canadian Science Advisory Secretary Habitat Status Report 2004/002.

Di Iorio, L., and C.W. Clark, 2010, "Exposure to Seismic Survey Alters Blue Whale Acoustic Communication," *Biology Letters* 6:51–54.

Dickerman, R.W., and R.G. Goelet, 1987, "Northern Gannet Starvation After Swallowing Styrofoam," *Marine Pollution Bulletin* 13: 18–20.

Dickerson, D.D., 1990, "Workgroup 1 Summary," pp. 74–75 in *Proceedings of the National Workshop on Methods to Minimize Dredging Impacts on Sea Turtles*, May 11 and 12, 1988, Jacksonville, Fla., Dickerson, D.D., and D.A. Nelson (comp.), Miscellaneous Paper EL-90-5, U.S. Army Engineer Waterways Experiment Station, Vicksburg, Miss.

Dickerson, D.D., D.A. Nelson, M. Wolff, and L. Manners, 1992, "Summary of Dredging Impacts on Sea Turtles: King's Bay, Georgia, and Cape Canaveral, Florida," pp. 148–151 in *Proceedings of the Eleventh Annual Workshop on Sea Turtle Biology and Conservation*, February 26–March 2, 1991, Jekyll Island, Ga., M. Salmon, and J. Wyneken (comp.), NOAA Technical Memorandum NMFS-SEFSC-302.

Dimarco, S.F., M.K. Howard, W.D. Nowlin, Jr., and R.O. Reid, 2004, *Subsurface, High-Speed Current Jets in the Deepwater Region of the Gulf of Mexico, Final Report*, OCS Study 2004-022, MMS, Gulf of Mexico OCS Region, New Orleans, La.

Ditty, J.G., 1986, "Ichthyoplankton in Neretic Waters of the Northern Gulf of Mexico off Louisiana: Composition, Relative Abundance, and Seasonality," *Fishery Bulletin* 84:935–946.

Ditty, J.G., G.G. Zieske, and R.F. Shaw, 1988, "Seasonality and Depth Distribution of Larval Fishes in the Northern Gulf of Mexico above 26°00' N," *Fishery Bulletin* 86:811–823.

Dixon, E.J., G. Sharma, and S. Stoker, 1986, *Alaskan Outer Continental Shelf Cultural Resource Compendium*, Technical Report No. 119, OCS Study MMS 86-0018, MMS, Alaska Outer Continental Shelf Office, Anchorage, Alaska.

Dodge, R.E., B.J. Baca, A.H. Knap, S.C. Snedaker, and T.D. Sleeter, 1995, *The Effects of Oil and Chemically Dispersed Oil in Tropical Ecosystems: 10 Years of Monitoring Experimental Sites*, MSRC Tech Rep Ser 95-014, Marine Spill Response Corporation, Washington, D.C.

Dolman, S., V. Williams-Grey, R. Asmutis-Silvia, and S. Issac, 2006, *Vessel Collisions and Cetaceans: What Happens When They Don't Miss the Boat?*, a Whale and Dolphin Conservation Society report. Available at http://www.wdcs.org/submissions_bin/shipstrikes.pdf. Accessed July 15, 2011.

Donohue, K., P. Hamilton, R. Leben, R. Watts, and E. Waddell, 2008, *Survey of Deepwater Currents in the Northwestern Gulf of Mexico*, OCS Study, MMS 2008-031, MMS, Gulf of Mexico OCS Region, Raleigh, N.C.

Dow, W.E., D.A. Mann, T.T. Jones, S.A. Eckert, and C.A. Harms, 2008, "In-Water and In-Air Hearing Sensitivity of the Green Sea Turtle (*Chelonia mydas*)," abstract, Acoustic Communication by Animals, 2nd International Conference, August 12–15, 2008, Corvallis, Ore.

Doyle, L.R., B. McCowan, S.F. Hanser, C. Chyba, T. Bucci, and J.E. Blue, 2008, "Applicability of Information Theory to the Quantification of Response to Anthropogenic Noise by Southeast Alaskan Humpback Whales" *Entropy* 10:33–46.

Draggan, S., 2010, "Deepwater Horizon Oil Spill and Marine Mammals," in *The Encyclopedia of Earth*, C.J. Cleveland (topic ed.), Environmental Information Coalition, National Council for Science and the Environment, Washington, D.C. Available at http://www.eoearth.org/article/ Deepwater_Horizon_Oil_Spill_and_Marine_Mammals?topic=50359. Accessed March 16, 2011.

Dunn, E.H., 1993, "Bird Mortality from Striking Residential Windows in Winter," *Journal of Field Ornithology* 64: 302–309.

Dunton, K., K. Iken, S. Shonberg, and D.W. Funk, 2009, *Long-Term Monitoring of the Kelp Community in the Stefansson Sound Boulder Patch: Detection of Change Related to Oil and Gas Development*, OCS Study MMS 2009-040, continuation of Arctic Near shore Impact Monitoring in the Development Area (cANIMIDA) Task 006, final report to the Minerals Management Service.

Dunton, K.H., 1984, "An Annual Carbon Budget for an Arctic Kelp Community," pp. 1–65 in *The Alaskan Beaufort Sea Ecosystems and Environments*, P.W. Barners, D.M. Schell, and E. Reimnitz (eds.), Academic Press, New York, N.Y.

Duronslet, M.J., C.W. Caillouet, S. Manzella, K.W. Indelicato, C.T. Fontaine, D.B. Revera, T. Williams, and D. Boss, 1986, *The Effects of Underwater Explosion on the Sea Turtles* Lepidochelys kempi *and* Caretta caretta *with Observations of Effects on Other Marine Organisms*, report submitted to National Marine Fisheries Service Biological Laboratory, Galveston, Texas.

EERE (U.S. Department of Energy, Office of Energy Efficiency and Renewable Energy) 2008, *Natural Gas Reforming*.

EERE, 2010, *Energy Cost Calculator for Electric and Gas Water Heaters*, Federal Energy Management Program, November 3. Available at http://www1.eere.energy.gov/femp/technologies/eep_waterheaters_calc.html#output. Accessed August 2011.

EERE, 2011a, "Table 2.1.20: Residential Buildings Share of U.S. Petroleum Consumption (Percent)," and "Table 3.1.15: Commercial Buildings Share of U.S. Petroleum Consumption (Percent)Buildings," *Energy Data Book 2010*, March. Available at http://buildingsdatabook.eren.doe.gov/. Accessed August 2011.

EERE, 2011b, "Table 2.1.19: Residential Buildings Share of U.S. Natural Gas Consumption (Percent)," and "Table 3.1.14: Commercial Buildings Share of U.S. Natural Gas Consumption (Percent)," *Buildings Energy Data Book 2010*, March. Available at http://buildingsdatabook.eren.doe.gov/. Accessed August 2011.

EERE, 2011c, "Table 3.1.4: 2008 Commercial Energy End-Use Splits, by Fuel Type (Quadrillion Btu)," in *Buildings Energy Data Book 2010*, March. Available at http://buildingsdatabook.eren.doe.gov/. Accessed August 20, 2011.

EERE, 2011d, *Energy Savers: Furnaces and Boilers*, February 9. Available at http://www.energysavers.gov/your_home/space_heating_cooling/index.cfm/mytopic=12530. Accessed August 20, 2011.

EIA, (U.S. Energy Information Administration), 2000, *Petroleum Supply Annual, 1999*, U.S. Department of Energy. Available at http://www.eia.gov/pub/oil_gas/petroleum/data_publications/petroleum_supply_annual/psa_volume1/historical/1999/psa_volume1_1999.html. Accessed July 21, 2011.

EIA, 2003, The *Global Liquefied Natural Gas Market: Status and Outlook*, U.S. Department of Energy DOE/EIA-0637, Dec.

EIA, 2007a, *Alternatives to Traditional Transportation Fuels 2007*, DOE/EIA-0585(2007).

EIA, 2007b, *Alternatives to Traditional Transportation Fuels 2007*, DOE/EIA-0585(2007).

EIA, 2007c, *Alternatives to Traditional Transportation Fuels 2007*, DOE/EIA-0585(2007).

EIA, 2008a, *Annual Energy Review 2008*, DOE/EIA-0384(2008). Available at http://www.eia.doe.gov/aer/. Accessed June 26, 2009.

EIA, 2008b, "Table 2.8: Motor Vehicle Mileage, Fuel Consumption, and Fuel Rates, 1949-2007," in *Annual Energy Review 2008*, DOE/EIA-0384(2008). Available at http://www.eia.doe.gov/aer/. Accessed June 26, 2009.

EIA, 2008c, "Table ES1: Summary Statistics for the United States," in *Electric Power Annual with Data for 2006*, July 7.

EIA, 2009a, *Energy Perspectives Overview, U. S. Energy Information Administration Annual Energy Review 2009*, DOE/EIS-0384 (2009), Available at http://www.eia.gov/emeu/aer/contents.html. Accessed August 19, 2010.

EIA, 2009b, "Table 5.14c: Heat Content of Petroleum Consumption: Transportation and Electric Power Sectors, 1949-2009," in *Annual Energy Review 2009*, DOE/EIA-0384(2009). Available at http://www.eia.doe.gov/aer/. August 19, 2010.

EIA, 2009c, Table 5.14c: Heat Content of Petroleum Consumption: Transportation and Electric Power Sectors, 1949-2008," in *Annual Energy Review 2008*, DOE/EIA-0384(2008). Available at http://www.eia.doe.gov/aer/. Accessed August 20, 2011.

EIA, 2009d, *Annual Energy Outlook Early Release Overview* December 14. Available at http://www.eia.doe.gov/oiaf/aeo/overview.html. Accessed August 20, 2011.

EIA, 2009e, "Table 5.14b: Heat Content of Petroleum Consumption: Industrial Sector, 1949-2008," in *Annual Energy Review 2008*, DOE/EIA-0384(2008), June 26. Available at http://www.eia.doe.gov/aer/. Accessed August 20, 2011.

EIA, 2009f, "Table 2.1d: Industrial Sector Energy Consumption, 1949-2008," in *Annual Energy Review 2008*, DOE/EIA-0384(2008), June 26, 2009 Available at http://www.eia.doe.gov/aer/. Accessed August 20, 2011.

EIA, 2009g, "Table 5.13b: Estimated Petroleum Consumption: Industrial Sector, 1949-2008," *Annual Energy Review 2008*, DOE/EIA-0384(2008), June 26. Available at http://www.eia.doe.gov/aer/. Accessed August 20, 2011.

EIA, 2009h, "Table 5.2: End Use of Fuel Consumption, 2006," in *Manufacturing Energy Consumption Survey 2006*, June. Available at http://www.eia.gov/emeu/mecs/mecs2006/2006tables.html. Accessed August 20, 2011.

EIA, 2009i, "Table 2.2: Nonfuel (Feedstock) Use of Combustible Energy, 2006," in *Manufacturing Energy Consumption Survey 2006*, June. Available at http://www.eia.gov/emeu/mecs/mecs2006/2006tables.html. Accessed August 20, 2011.

EIA, 2009j, "Table 5.2: End Use of Fuel Consumption, 2006," in *Manufacturing Energy Consumption Survey 2006*, June. Available at http://www.eia.gov/emeu/mecs/mecs2006/2006tables.html. Accessed August 2011.

EIA, 2009k, "Table 2.2: Nonfuel (Feedstock) Use of Combustible Energy, 2006," in *Manufacturing Energy Consumption Survey 2006*, June. Available at http://www.eia.gov/emeu/mecs/mecs2006/2006tables.html. Accessed August 2011.

EIA, 2009l, "Table 2.1b: Residential Sector Energy Consumption, 1949-2008," and "Table 2.1c: Commercial Sector Energy Consumption, 1949-2008," in *Annual Energy Review 2008*, DOE/EIA-0384(2008), June 26. Available at http://www.eia.doe.gov/aer/. Accessed August 21, 2011.

EIA, 2009m, "Table 5.13a: Estimated Petroleum Consumption: Residential and Commercial Sectors, 1949-2008," in *Annual Energy Review 2008*, DOE/EIA-0384(2008), June 26. Available at http://www.eia.doe.gov/aer/. Accessed August 21, 2011.

EIA, 2009n, "Table 2.5: Household Energy Consumption and Expenditures by End Use and Energy Source, Selected Years, 1978-2005," in *Annual Energy Review 2008*, DOE/EIA-0384(2008), June 26. Available at http://www.eia.doe.gov/aer/. Accessed August 20, 2011.

EIA, 2009o, "Table 5.14a: Heat Content of Petroleum Consumption: Residential and Commercial Sectors, 1949-2008," in *Annual Energy Review 2008*, DOE/EIA-0384(2008), June 26. Available at http://www.eia.doe.gov/aer/. Accessed August 20, 2011.

EIA, 2009p, "Table 2.6: Household End Uses: Fuel Types and Appliances, Selected Years, 1978-2005," in *Annual Energy Review 2008*, DOE/EIA-0384(2008), June 26. Available at http://www.eia.doe.gov/aer/. Accessed August 20, 2011.

EIA, 2009q, *Bringing Alaska North Slope Natural Gas to Market*, Annual Energy Outlook Analyses papers, U.S. Department of Energy. Available at http://www.eia.gov/oiaf/aeo/otheranalysis/aeo_2009analysispapers/aeo_analyses.html. Accessed July 18, 2011.

EIA, 2010a, *Petroleum Supply Annual, 2009 (released July 29)*, U.S. Department of Energy. Available at http://www.eia.gov/oil_gas/petroleum/data_publications/petroleum_supply_annual/psa_volume1/psa_volume1.html. Accessed July 20, 2011.

EIA, 2010b, *Natural Gas Annual Supply and Disposition by State, 2009*, U.S. Department of Energy. Available at http://www.eia.gov/dnav/ng/ng_sum_snd_a_EPG0_FPD_Mmcf_a.htm. Accessed July 20, 2011.

EIA, 2010c, "Table ES1: Summary Statistics for the United States," in *Electric Power Annual with Data for 2008*, January 21. Available at http://www.eia.doe.gov/cneaf/electricity/epa/epa_sum.html. Accessed August 20, 2011.

EIA, 2010d, "Table ES1: Summary Statistics for the United States," *Electric Power Annual with Data for 2008*. Available at January 21, 2010. Available at http://www.eia.doe.gov/cneaf/electricity/epa/epa_sum.html. Accessed August 20, 2011.

EIA, 2011a, *Petroleum and Other Liquids: U.S. Imports of Crude Oil and Petroleum Products (released June 29)*, U.S. Department of Energy. Available at http://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=PET&s=MTTIMUS1&f=M. Accessed July 20, 2011.

EIA, 2011b, *Annual Energy Outlook 2011 with Projections to 2035*, U.S. Department of Energy DOE/EIA-0383 (2011), April.

EIA, 2011c, *Special Report – EIA Report on Alaska Prudhoe Bay Crude Oil Shut-In: Facts and Impacts on the U.S. Oil Markets*. Available at http://205.254.135.24/oog/special/eia_sr_alaska.html. Accessed August 19, 2011.

EIC and NCSE (Environmental Information Coalition and National Council for Science and the Environment), 2010, "Surface Washing Agents," in *The Encyclopedia of Earth*, C.J. Cleveland (ed.), Washington, D.C., last revised Oct. 7, 2010. Available at http://www.eoearth.org/article/Surface_washing_agents. Accessed January 5, 2011.

Ejechi, B.O., 2003, "Biodegradation of Wood in Crude Oil-Polluted Soil," *World Journal of Microbiology & Biotechnology* 19(8):799–804.

Eley, W.D., 2006, Cook Inlet Vessel Traffic Study: A Report to Cook Inlet Regional Citizens Advisory Council, Cape International, Inc., Dec.

Ellis, D.H., C.H. Ellis, and D.P. Mindell, 1991, "Raptor Responses to Low-Level Jet Aircraft and Sonic Boom," *Environmental Pollution* 74: 53–83.

Encyclopedia of Life, 2011, "North Pacific Right Whale," in *Encyclopedia of Life*, C.J. Cleveland (ed.), , Environmental Information Coalition, National Council for Science and the Environment, Washington, D.C. Available at http://www.eoearth.org/article/North_Pacific_Right_Whale?topic=49540. Accessed September 6, 2011.

Engelhardt, F.R., 1981, "Oil Pollution in Polar Bears. Exposure and Clinical Effects," pp. 139–179 in *Proceedings of the Fourth Arctic Marine Oil Spill Program Technical Seminar*, 16–18 June 1981, Edmonton, Alberta, Canada.

EnerNex Corporation, 2010, *Eastern Wind Integration and Transmission Study: Executive Summary and Project Overview*, prepared for the National Renewable Energy Laboratory, January. Available at http://www.nrel.gov/wind/systemsintegration/pdfs/2010/ewits_executive_summary.pdf. Accessed August 20, 2011.

Epstein, N., R.P.M. Bak, and B. Rinkevich, 2000, "Toxicity and Third Generation Dispersants and Dispersed Egyptian Crude Oil on Red Sea Coral Larvae," *Marine Pollution Bulletin* 40:497–503.

Erbe, C., 2002, "Underwater Noise of Whale-Watching Boats and Potential Effects on Killer Whales (*Orcinus orca*), Based on an Acoustic Impact Model," *Marine Mammal Science* 18(2):394–418.

Erbe, C., A.R. King, M. Yedlin, and D.M. Farmer, 1999, "Computer Models for Masked Hearing Experiments with Beluga Whales (*Delphinapterus leucas*)," *Journal of the Acoustical Society of America* 105(5):2967–2978.

ERCO (Energy Resources Co., Inc.), 1982, *Ixtock Oil Spill Assessment Final Report*. Prepared for Bureau of Land Management, Contract No. AA851-CTO-71.

Esler, D., J.A. Schmutz, R.L. Jarvis, and D.M. Mulcahy, 2000, "Winter Survival of Adult Harlequin Ducks in Relation to History of Contamination by the *Exxon Valdez* Oil Spill," *Journal of Wildlife Management* 64: 839–847.

Esler, D., T.D. Bowman, K.A. Trust, B.E. Ballachey, T.A. Dean, S.C. Jewett, and C.E. O'Clair, 2002, "Harlequin Duck Population Recovery Following the 'Exxon Valdez' Oil Spill: Progress, Process and Constraints," *Marine Ecology Progress Series* 241: 271–286.

Espey, Huston & Associates, Inc., 1990, *California, Oregon, and Washington Archaeological Resource Study*, OCS Study MMS 90-0087 to 90-0092, prepared for Pacific OCS Region, Austin, Texas.

Eurobserv'er 2011, *Solar Thermal and Concentrated Solar Power Barometer*, May. Available at http://www.eurobserv-er.org/pdf/solar_thermal_barometer_2011.pdf. Accessed August 21, 2011.

Evans, D.D., 1988, "Combustion of Oil Spills on Water," in *Technology Assessment and Research Program for Offshore Minerals Operations*, OCS Study MMS 86-0057, MMS, Washington, D.C.

Everett, K.R. 1980. Distribution and Properties of Road Dust Along the Northern Portions of the Haul Road. In: Environmental Engineering and Ecological Baseline Investigations Along the Yukon River- Prudhoe Bay Haul Road, J. Brown, and R.L. Berg, eds. CRREL Rep. 80-19. Hanover NH: U.S. Army Corps of Engineers Cold Regions Research and Engineering Laboratory. pp. 101-128.

Ewing, R., et al., 2008, *Growing Cooler: The Evidence on Urban Development and Climate Change*, Urban Land Institute.

Exxon Valdez Oil Spill Trustees, 1992, "Summary of Injury," *Alaska's Marine Resources* VII(3):2–11.

Exxon Valdez Oil Spill Trustee Council, 2003, *Update on Injured Resources and Services*, August 2002, with June 2003 additions.

Exxon Valdez Oil Spill Trustee Council, 2009a, Exxon Valdez *Oil Spill Trustee Council 2009 Status Report*, Anchorage, Alaska. Available at http://www.evostc.state.ak.us/universal/documents/publications/20th%20Anniversay%20Report/2009%20Status%20Report%20(Low-Res).pdf. Accessed June 24, 2011.

Exxon Valdez Oil Spill Trustee Council, 2009b, *Legacy of an Oil Spill 20 Years after* EXXON VALDEZ, Exxon Valdez *Oil Spill Trustee Council 2009 Status Report*.

Exxon Valdez Oil Spill Trustee Council, 2010a, Exxon Valdez *Oil Spill Restoration Plan, 2010 Update on Injured Resources and Services*, May 14.

Exxon Valdez Oil Spill Trustee Council, 2010b, *Lingering Oil Report*, January.

Exxon Valdez Oil Spill Trustee Council, 2010c, Exxon Valdez *Oil Spill Restoration Plan, 2010 Update, Injured Resources and Services*, Anchorage, Alaska. May 14. Available at http://www.evostc.state.ak.us/universal/documents/publications/2010IRSUpdate.pdf. Accessed June 24, 2011.

FAA (Federal Aviation Administration), 2004, "Chapter 9: Helicopter Oceanic Operations. 1. Gulf of Mexico," in *Advisory Circular 91-70: Oceanic Operations, an Authoritative Guide to Oceanic Operations (09-06-94)*, updated July 9, 2004, Federal Aviation Administration, Washington, D.C.

FAA, 2008, *2009-2013 FAA Flight Plan*. Available at http://www.faa.gov/about/plans_reports/media/flight_plan_2009-2013.pdf Accessed August 20, 2011.

FAA, 2010, *Advisory Circular AC No: 91-70A, Oceanic and International Operations*, U.S. Department of Transportation, Washington, D.C. Available at http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/MainFrame?OpenFrameSet. Accessed September 11, 2011.

Fabricius, K.E., 2005, "Effects of Terrestrial Runoff on the Ecology of Corals and Coral Reefs: Review and Synthesis," *Marine Pollution Bulletin* 50:125–146.

Fair, P.A., and P.R. Becker, 2000, "Review of Stress in Marine Mammals," *Journal of Aquatic Ecosystem Stress and Recovery* 7:335–354.

Fall, J.A., 2009, "Long-Term Consequences of the *Exxon Valdez* Oil Spill for Subsistence Uses of Fish and Wildlife," pp. 245–277 in *Synthesis: Three Decades of Research on Socioeconomic Effects Related to Offshore Petroleum Development in Coastal Alaska*, S.R. Braund and J. Kruse (eds.), MMS OCS Study No. 2009-006, Stephen R. Braund and Associates, Anchorage, Alaska.

Fall, J.A., and C.J. Utermohle, 1999, *Subsistence Harvests and Uses in Eight Communities Ten Years After the Exxon Valdez Oil Spill*, Technical Paper No. 252, State of Alaska, Department of Fish and Game, Division of Subsistence, Juneau, Alaska.

Fall, J.A., L.J. Field, T.S. Nighswander, N. Peacock, and U. Varansi (eds.), 1999, "Overview of Lessons Learned from the Exxon Valdez Oil Spill: A 10-Year Retrospective," in *Evaluating and Communicating Subsistence Seafood Safety in a Cross-Cultural Context*, SETAC Press, Pensacola, Fla.

Fall, J.A., C. Brown, M.F. Turek, N.Braem, J.J. Simon, W.E. Simeone, D.L. Holen, L. Naves, L. Hutchinson-Scarbrough, T. Lemons, V. Ciccone, T.M. Kreig, and D. Koster, 2009, *Alaska Subsistence Salmon Fisheries 2007 Annual Report*, Technical Paper No. 346, Alaska Department of Fish and Game, Division of Subsistence, Anchorage.

Fan, S., G. Jeans, C. Yetsko, and L. Oey, 2007, "Submerged Jet Currents in the Gulf of Mexico," *Proceedings of Oceans 2007*. Available at http://ieeexplore.ieee.org/stamp/stamp.jsp?tp=&arnumber=4449299&isnumber=4449115. Accessed May 18, 2011.

Fay, F.H., B.P. Kelly, P.H. Gehnrich, J.L. Sease, and A.A. Hoover, 1984, *Modern Populations, Migrations, Demography, Trophics, and Historical Status of the Pacific Walrus*, USDOC/NOAA, OCSEAP Final Rep. 37 (1986):231-376, prepared for MMS, OCS Study MMS 86-0021.

FFWCC (Florida Fish and Wildlife Conservation Commission), 2003, *Florida's Breeding Bird Atlas: A Collaborative Study of Florida's Birdlife*. Available at http://www.wildflorida.org/bba. Accessed May 5, 2005.

Field, C.B., L.D. Mortsch,, M. Brklacich, D.L. Forbes, P. Kovacs, J.A. Patz, S.W. Running, and M.J. Scott, 2007, *North America, Climate Change 2007: Impacts, Adaptation, and Vulnerability, Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*, M.L. Parry, O.F. Canziani, J.P. Palutikof, P.J. van der Linden, and C.E. Hanson (eds.), Cambridge University Press, Cambridge, U.K., pp. 617–652.

Field, L.J., J.A. Fall, T.J. Nighswander, N. Peacock, and U. Varanasi (eds.), 1999, *Evaluating and Communicating Subsistence Seafood Safety in a Cross-Cultural Context*, SETAC Press, Pensacola, Fla.

Fingas, M., 2008, *A Review of Literature Related to Oil Spill Dispersants 1997-2008*, prepared for Prince William Sound Regional Citizens' Advisory Council, Anchorage, Alaska, Sept. Available at http://www.pwsrcac.org/docs/d0053000.pdf. Accessed July 3, 2011.

Fingas, M., F. Ackerman, P. Lambert, K. Li, Z. Wang, J. Mullin, L. Hannon, D. Wang, A. Steenkammer, R. Hiltabrand, R. Turpin, and P. Campagna, 1995, "The Newfoundland Offshore Burn Experiment: Further Results of Emissions Measurement," in *Proceedings of the Eighteenth Arctic and Marine Oilspill Program (AMOP) Technical Seminar*, Vol. 2, June 14–16, 1995, Edmonton, Alberta, Canada.

Fischer, A., 1968, "History and Current Status of the Houma Indians," pp. 133–147 in *The American Indian Today*, S. Levine and S. Oestreich Lurie (eds.), Everett Edwards, Deland, Fla.

Fissel, D.B., J.R. Marko, and M.M. de Saavedra Alvarez, 2009, "The Changing Met-Ocean and Ice Conditions in the Beaufort Sea: Implications for Offshore Oil and Gas," in *Proceedings of the International Offshore and Polar Engineering Conference*, Osaka, Japan, June 21–26.

Fodrie, F.F., and K.L. Heck, Jr., 2011, "Response of Coastal Fishes to the Gulf of Mexico Oil Disaster," PLoS ONE 6(7):e21609. doi10.1371/journal.pone.0021609.

Folger, P., 2010, *Gas Hydrates: Resource and Hazard*, Congressional Research Service, May 25.

Follmann, E.H., and J.L. Hechtel, 1990, "Bears and Pipeline Construction in Alaska," *Arctic* 43:103–109.

Foote, R.Q., and R.G. Martin, 1981 "Potential Geologic Hazards in the Gulf of Mexico Maritime Boundary Region," in *Geologic Framework, Petroleum Potential, Petroleum-Resource Estimates, Mineral and Geothermal Resources, Geologic Hazards, and Deep-Water Drilling Technology of the Maritime Boundary Region in the Gulf of Mexico*, R.B. Powers (ed.), U.S. Geological Survey Open File Report 81-265.

Ford, B., A. Borgens, W. Bryant, D. Marshall, P. Hitchcock, C. Arias, and D. Hamilton, 2008, *Archaeological Excavation of the Mardi Gras Shipwreck (16GM01), Gulf of Mexico Continental Slope*, OCS Report MMS 2008-037, prepared by Texas A&M University, Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La.

Fox, D.A., J.E. Hightower, and F.M. Paruka, 2000, "Gulf Sturgeon Spawning Migration and Habitat in the Choctawhatchee River System, Alabama-Florida," *Transactions of the American Fisheries Society* 129:811–826.

Frankel, A.S., and W.T. Ellison, 2005, *Explosive Removal Scenario Simulation Results: Final Report*, OCS Study MMS 2004-064, Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La.

Fried, N., and B. Windisch-Cole, 2004, "The Kenai Peninsula Borough: An Economy that Benefits from Diversity," *Alaska Economic Trends*, J. Erskine (ed.), November. Available at http://www.cookinletoilandgas.org/State/Economic%20Data/DLWD%20Trends%20November %202004.pdf. Accessed April 25, 2011.

Fritts, T.H., and M.A. McGehee, 1982, *Effects of Petroleum on the Development and Survival of Marine Turtle Embryos*, FWS-OBS-82/37, U.S. Fish and Wildlife Service, Office of Biological Services, Washington, D.C.

Frost, K.J., and L.F. Lowry, 1994, *Assessment of Injury to Harbor Seals in Prince William Sou8nd, Alaska, and Adjacent Areas following the Exxon Valdez Oil Spill*, Final Report, Marine Mammals Study Number 5, State-Federal Natural Resource Damage Assessment for 1 April 1989 through 31 September 1991.

Frost, K.J., L.F. Lowry, and G. Carroll, 1993, "Beluga Whale and Spotted Seal Use of a Coastal Lagoon System in the Northeastern Chukchi Sea," *Arctic* 46:8–16.

Fry, D.M., and L.J. Lowenstine, 1985, "Pathology of Common Murres and Cassin's Auklets Exposed to Oil," *Archives of Environmental Contamination and Toxicology* 14: 725–737.

Fry, D.M., R. Boekelheide, J. Swensen, A. Kang, J. Young, and C.R. Grau, 1985, "Long-Term Responses of Breeding Seabirds to Oil Exposure," *Pacific Seabird Group Bulletin* 10: 48–49.

Frye, M. (compiler), 2008, *Preliminary Evaluation of In-Place Gas Hydrate Resources: Gulf of Mexico Outer Continental Shelf*, MMS Resource Evaluation Division, OCS Report MMS 2008-004, Feb. 1.

Garrison, E.G., C.P. Giammona, F.J. Kelly, A.R. Tripp, and G.A. Wolff, 1989, *Historic Shipwrecks and Magnetic Anomalies of the Northern Gulf of Mexico: Reevaluation of Archaeological Resource Management Zone*, OCS Study MMS 89-0023, 89-0024, and 89-0025, Gulf of Mexico OCS Region, New Orleans, La.

Garrott, R.A., L.E. Eberhardt, and W.C. Hanson, 1983, "Summer Food Habits of Juvenile Arctic Foxes in Northern Alaska," *Journal of Wildlife Management* 47(2): 540–545.

Gass, S.E., and J.M. Roberts, 2006, "The Occurrence of the Cold-Water Coral *Lophelia pertusa* (Scleractinia) on Oil and Gas Platforms in the North Sea: Colony Growth, Recruitment, and Environmental Controls on Distribution," *Marine Pollution Bulletin* 52:549–559.

Gatto, L.W., 1975, *Baseline Data on the Oceanography of Cook Inlet, Alaska*, Technical Report 76-25, USACE, CRREL (Cold Regions Research and Engineering Laboratory), Hanover, N.H.

GCCF (Gulf Coast Claims Facility), 2011, *Overall Program Statistics*, as of May 05, 2011. Available at http://www.GulfCoastClaimsFacility.com. Accessed June 15, 2011.

GE Energy, 2010, *Western Wind and Solar Integration Study: Executive Summary*, prepared for the National Renewable Energy Laboratory, May. Available at http://www.nrel.gov/wind/systemsintegration/pdfs/2010/wwsis_executive_summary.pdf. Accessed August 20, 2011.

Geoplatform, 2011a, *Shoreline Cleanup and Assessment Team (SCAT), Latest Ground Observations, 01-12-11, Louisiana Sector*, Environmental Response Management Application (ERMA) Dataset Results. Available at www.geoplatform.gov\gulfresponse. Accessed January 13, 2011.

Geoplatform, 2011b, *Shoreline Cleanup and Assessment Team (SCAT), Latest Ground Observations, 01-12-11, Mobile Sector*, Environmental Response Management Application (ERMA) Dataset Results. Available at www.geoplatform.gov\gulfresponse. Accessed January 13, 2011.

Geraci, J.R., 1990, "Physiologic and Toxic Effects on Cetaceans," pp. 167–197 in *Sea Mammals and Oil: Confronting the Risks*, J.R. Geraci and D.J. St. Aubin (eds.), Academic Press, San Diego, Calif.

Geraci, J.R., and D.J. St. Aubin, 1982, *Study of the Effects of Oil on Cetaceans, Final Report*, Bureau of Land Management, New York OCS Office, July 20.

Geraci, J.R., and D.J. St. Aubin, 1985, *Expanded Studies of the Effects of Oil on Cetaceans, Part I, Final Report*, Minerals Management Service, Washington, DC.

Geraci, J.R., and D.J. St. Aubin, 1987, "Effects of Offshore Oil and Gas Development on Marine Mammals and Turtles," pp. 587–617. in *Long Term Environmental Effects of Offshore Oil and Gas Development*, D.F. Boesch and N.N. Rabalais (eds.), Elsevier Applied Science Publ. Ltd., London and New York.

GESAMP (Joint Group of Experts on the Scientific Aspects of Marine Environmental Protection), 1995, *The Sea-Surface Microlayer and Its Role in Global Change*, GESAMP Reports and Studies 59, Joint Group of Experts (IMO/FAO/Unesco-IOC/WMO/WHO/IAEA/UN/UNEP) on the Scientific Aspects of Marine Environmental Protection.

Gitschlag, G., 2000, *Fisheries Impacts of Underwater Explosives Used in Platform Salvage in the Gulf of Mexico 1993–1998*, pp. 53–59 in *Proceedings: Eighteenth Annual Gulf of Mexico Information Transfer Meeting, December 1998*, M. McKay and J. Nides (eds.), OCS Study MMS 2000-030, Minerals Management Service, Gulf of Mexico Outer Continental Shelf Region, New Orleans, La.

Gitschlag, G.R., and B.A. Herczeg, 1994, "Sea Turtle Observations at Explosive Removals of Energy Structures," *Mar. Fish. Rev*. 56(2):1–8.

Gittings, S.R., 1998, "Monitoring at the Flower Gardens: History and Status," pp. 623–630 in *Proceedings of the 17th Information Transfer Meeting*, Minerals Management Service, Gulf of Mexico Outer Continental Shelf Region, New Orleans, La.

Gladwin, D.N., K.M. Manci, and R. Villella, 1988, *Effects of Aircraft Noise and Sonic Booms on Domestic Animals and Wildlife: Bibliographic Abstracts*. NERC-88/32, U.S. Fish and Wildlife Service, National Ecology Research Center, Ft. Collins, CO.

Glass, A., T.V.N. Cole, M. Garron, R.L. Merrick, and R.M. Pace, 2008, *Mortality and Serious Injury Determinations for Baleen Whale Stocks Along the United States Eastern Seaboard and Adjacent Canadian Maritimes, 2002-2006*, National Oceanic and Atmospheric Administration, Northeast Fisheries Science Center Reference Document 08-04.

Goldstein, B.D., H.J. Osofsky, and M.Y. Lichtveld, 2011, "The Gulf Oil Spill," *New England Journal of Medicine* 364:1344–1348.

Golet, G.H., P.E. Seiser, A.D. McGuire, D.D. Roby, J.B. Fischer, K.J. Kuletz, D.B. Irons, T.A. Dean, S.J. Jewett, and S.H. Newman, 2002, "Long-Term Direct and Indirect Effects of the 'Exxon Valdez' Oil spill on Pigeon Guillemots in Prince William Sound, Alaska," *Marine Ecology Progress Series* 241: 287–304.

Goold, J.C., and S.E. Jones, 1995, "Time and Frequency Domain Characteristics of Sperm Whale Clicks," *Journal of the Acoustical Society of America* 98(3):1279–1281.

Gordon, J.C.D., D. Gillespie, J. Potter, A. Frantzis, M. Simmonds, and R. Swift, 1998, "The Effects of Seismic Surveys on Marine Mammals," in M.L. Tasker and C. Weir (eds.), *Proceedings of the Seismic and Marine Mammals Workshop, London*, June 23–25, 1998.

Gordon, J., D. Gillespie, J. Potter, A. Frantzis, M.P. Simmonds, R. Swift, and D. Thompson, 2003/2004, "A Review of the Effects of Seismic Surveys on Marine Mammals," *Marine Technology Society Journal* 37:16–34.

Gow, A.J., and W.B. Tucker III, 1991, *Physical and Dynamic Properties of Sea Ice in the Polar Oceans*, monograph 91-1, USACE, CRREL (Cold Regions Research and Engineering Laboratory), Hanover, N.H.

Graedel, T.E., and J.A. Howard-Grenville, 2005, *Greening the Industrial Facility: Perspectives, Approaches, and Tools*, Springer, New York.

Grantz, A., et al., 1994, "Geology of the Arctic Continental Margin of Alaska," in *The Geology of North America, Vol. G-1, The Geology of Alaska*, G. Plafker and H.C. Berg (eds.), The Geological Society of America.

Grantz, A., D.A., Dinter, E.R. Hill, R.E. Hunter, S.D. May, R.H. McMullin, and R.L. Phillips, 1982a, *Geologic Framework, Hydrocarbon Potential, and Environmental Conditions for Exploration and Development of Proposed Oil and Gas Lease Sale 85 in the Central and Northern Chukchi Sea – A Summary Report*, U.S. Geological Survey Open File Report 82-1053.

Grantz, A., D.A. Dinter, E.R. Hill, S.D. May, R.H. McMullin, R.L. Phillips, and E. Reimnitz, 1982b, *Geologic Framework, Hydrocarbon Potential, and Environmental Conditions for Exploration and Development of Proposed Oil and Gas Lease Sale 87 in the Beaufort and Northeast Chukchi Sea – A Summary Report*, U.S. Geological Survey Open File Report 82-482.

Grantz, A., and D.A. Dinter, 1980, "Constraints of Geologic Processes on Western Beaufort Sea Oil Developments," *Oil and Gas Journal* 78(18):304–319.

Greb, S.F., and A.W. Archer, 2007, "Soft-Sediment Deformation Produced by Tides in a Meizoseismic Area, Turnagain Arm, Alaska," *Geology* 35:435–438.

Grieb, T.M., T.E. Donn, J. Collins, J. Radde, C. Perez, J.B. Smith, G. Rowe, S. Scott, and G.T. Ririe, 2008, *Effects of Subsea Processing on Deepwater Environments in the Gulf of Mexico*, OCS Study MMS 2008-022, Minerals Management Service, Gulf of Mexico Outer Continental Shelf Region, New Orleans, La.

Greene, C.R., Jr., N.S. Alman, and W.J. Richardson, 1999, "The Influence of Seismic Survey Sounds on Bowhead Whale Calling Rates," *Journal of the Acoustical Society of America* 106(4):2280.

Griffith, B., D.C. Douglas, N.E. Walsh, D.D. Young, T.R. McCabe, D.E. Russell, R.G. White, R.D. Cameron, and K.R. Whitten, 2002, "Section 3: The Porcupine Caribou Herd," pp. 8–37 in D.C. Douglas, *Arctic Refuge Coastal Plain Terrestrial Wildlife Research Summaries*, P.E. Reynolds and E.B. Rhodes (eds.), U.S. Geologic Survey, Biological Resources Division, Biological Science Report USGS/BRD/BSR-2002-0001.

Grotefendt, K., K. Logermann, D. Quadfasel, and S. Ronski, 1998, "Is the Arctic Ocean Warming?" *Journal of Geophysical Research* 103C(12):679–687.

GulfBase, 2011, *General Facts about the Gulf of Mexico*. Available at http://www.gulfbase.org/facts.php. Accessed February 4, 2011.

Gunn, J., and R. Muench, 2001, "Observed Changes in Arctic Ocean Temperature Structure over the Past Half Decade," *Geophysical Research Letters* 28(6):1035–1038.

Guzman, H.M., J.B.C. Jackson, and E. Weil, 1991, "Short-Term Ecological Consequences of a Major Oil Spill on Panamanian Subtidal Reef Corals," *Coral Reefs* 10:1–12.

Haapkylai, J., F. Ramade, and B. Salvat, 2007, "Oil Pollution on Coral Reefs: A Review of the State of Knowledge and Management Needs," *Vie Milieu* 57:95–111.

Haddad, R., and S. Murawski, 2010, *Analysis of Hydrocarbons in Samples Provided from the Cruise of the R/V WEATHERBIRD II, May 23–26, 2010,* National Oceanic and Atmospheric Administration, Silver Spring, Md. Available at http://www.noaanews.noaa.gov/stories2010/PDFs/noaa_weatherbird_analysis.pdf. Accessed June 24, 2011.

Haeussler, P.J., and R.W. Saltus, 2004, "26 km Offset on the Lake Clark Fault since Late Eocene Time," Professional Paper 1709-A in *Studies by the U.S. Geological Survey in Alaska*.

Haeussler, P.J., R.L. Bruhn, and T.L. Pratt, 2000, "Potential Seismic Hazards and Tectonics of the Upper Cook Inlet Basin, Alaska, Based on Analysis of Pliocene and Younger Deformation," *GSA Bulletin* 112(9):1414–1429.

Haley, B., G. Tomlins, O. Smith, W. Wilson, and M. Link, 2000, *Mapping Cook Inlet Rip Tides Using Local Knowledge and Remote Sensing*, OCS study, MMS 2000-025, MMS, Anchorage, Alaska.

Hamilton, P., 1990, "Deep Currents in the Gulf of Mexico," *Journal of Physical Oceanography* 20(7):1087–1104.

Hamilton, P., 2007, "Deep-Current Variability near the Sigsbee Escarpment in the Gulf of Mexico," *Journal of Physical Oceanography* 37(3):708–726.

Hamilton, P., 2009, "Topographic Rossby Waves in the Gulf of Mexico," *Progress in Oceanography* 82:1–31.

Hamilton, P., and A. Badan, 2009, "Subsurface Jets in the Northwestern Gulf of Mexico," *Journal of Physical Oceanography* 39(11):2875–2891.

Hamilton, C.I., S.J. Starr, and L.L. Trasky, 1979, *Recommendations for Minimizing the Impacts of Hydrocarbon Development on Fish, Wildlife and Aquatic Plant Resources of Lower Cook Inlet*, Alaska Department of Fish and Game, Marine and Coastal Habitat Management, Anchorage, Alaska.

Hamilton, P., T.J. Berger, J. Singer, B. Waddell, J. Churchill, R. Leben, T. Lee, and W. Sturges, 2000, *Desoto Canyon Eddy Intrusion Study, Final Report, Volume II: Technical Report*, OCS Study 2000-080, MMS, Gulf of Mexico OCS Region, New Orleans, La.

Hampton, M.A., 1982a, *Synthesis Report: Environmental Geology of Lower Cook Inlet Alaska*, U.S. Geological Survey Open File Report 82-197.

Hampton, M.A., 1982b, *Synthesis Report: Environmental Geology of Kodiak Shelf, Alaska*, U.S. Geological Survey Open File Report 82-59.

Hampton, M.A., A.H. Bouma, M.E. Torresan, and I.P. Colburn, 1978, "Analysis of Microtextures on Quartz Sand Grains from Lower Cook Inlet, Alaska," *Geology*, 6:105–110.

Hampton, M.A., K.H. Johnson, M.E. Torresan, and W.J. Winters, 1981, *Description of Seafloor Sediment and Preliminary Geo-Environmental Report, Shelikof Strait, Alaska*, U.S. Geological Survey Open File Report 81-1133.

Hance, J.J., 2003, *Development of a Database and Assessment of Seafloor Stability Based on Published Literature*, Offshore Technology Research Center, Texas A&M University, College Station, Texas.

Haney, J.L., Y. Wei, and S.G. Douglas, 2004, *A Preliminary Assessment of On-shore Air Quality Impacts for the Eastern Gulf Coast (Louisiana to Florida) Using the 2000 Gulf-wide Emissions Inventory, Draft Report*, May 28.

Haney, J.L., Y. Wei, and S.G. Douglas, 2004, *A Preliminary Assessment of On-shore Air Quality Impacts for the Eastern Gulf Coast (Louisiana to Florida) Using the 2000 Gulfwide Emissions Inventory, Draft Report*, prepared by ICF Consulting, San Rafael, Calif., for MMS, New Orleans, La., May 28.

Hanna, S.R., and P.J. Drivas, 1993, "Modeling VOC Emissions and Air Concentrations from the Exxon Valdez Oil Spill," *J. Air Waste Manage. Assoc.* 43:298–309.

Hansen, D.J., 1981, *The Relative Sensitivity of Seabird Populations in Alaska to Oil Pollution*. BLMYK-ES-006-1792. U.S. Department of the Interior, Bureau of Land Management, Anchorage, AK.

Harbinson, D., and R. Knight, 2002, "Floating Production Growth Continues into 2003," *Offshore Magazine* 62:12.

Hardage, B., 2011, *Multicomponent and Multifrequency Seismic for Assessment of Fluid-Gas Expulsion Geology and Gas Hydrate Deposits: Gulf of Mexico*, Bureau of Economic Geology Research. Available at http://www.beg.utexas.edu/resprog/geophysics/fluid-gasexpulsion.htm. Accessed January 28, 2011.

Harting, A.L., 1987, "Road, Highway, Aircraft, and Garbage Impacts," pp. 69−74 in *Grizzly Bear Compendium*, M.N. LeFranc et al. (eds.), sponsored by the Interagency Grizzly Bear Committee, produced by the National Wildlife Federation, Washington, D.C.

Hartung, R., 1995, "Assessment of the Potential for Long-Term Toxicological Effects of the *Exxon Valdez* Oil Spill on Birds and Mammals," *Exxon Valdez Oil Spill: Fate and Effects in Alaskan Waters, ASTM STP 1219*, pp. 693–725, P.G. Wells et al. (eds.), American Society for Testing and Materials, Philadelphia, PA.

Harvey, J.T., and M.E. Dahlheim, 1994, "Cetaceans in Oil," pp. 257–264 in *Marine Mammals and the* Exxon Valdez, T.R. Loughlin, (ed.), Academic Press, San Diego.

Hayes, M., et al., 1992, *An Introduction to Coastal Habitats and Biological Resources for Oil Spill Response*, Report No. HMRAD 92-4, National Oceanic and Atmospheric Administration, Hazardous Materials Response and Assessment Division.

Hayes, M.O., R. Hoff, J. Michel, D. Scholz, and G. Shigenaka, 1992, *An Introduction to Coastal Habits and Biological Resources for Oil Spill Response*, Report No. HNRAD 92-4, Hazardous Materials Response and Assessment Division, National Oceanic and Atmospheric Administration, Seattle, Wash.

Hawkes, L.A., A.C. Broderick, M.H. Godfrey, and B.J. Godley, 2009, "Climate Change and Marine Turtles," *Endangered Species Research* 7:137–154.

Hazel, J., I.V. Lawler, H. Marsh, and S. Robson, 2007, "Vessel Speed Increases Collision Risk for the Green Turtle *Chelonia mydas*," *Endangered Species Research* 3:105–113.

Hearon, G., D. Dickins, K. Ambrosius, and K. Morris, 2009, *Mapping Sea Ice Overflood Using Remote Sensing: Smith Bay to Camden Bay*, OCS study, MMS 2009-017, MMS, Anchorage, Alaska.

Heathershaw, A.D., P.D. Ward, and A.M. David, 2002, "The Environmental Impact of Underwater Sound," *Proceedings of the Institute of Acoustics* 23(4):1–13.

Hemmer, M.J., M.G. Barron, and R.M. Greene, 2010a, *Comparative Toxicity of Eight Oil Dispersant Products on Two Gulf of Mexico Aquatic Test Species*, U.S. Environmental Protection Agency, Office of Research and Development. Available at http://www.epa.gov/bpspill/reports/ComparativeToxTest.Final.6.30.10.pdf. Accessed June 3, 2011.

Hemmer, M.J., M.G. Barron, and R.M. Greene, 2010b, *Comparative Toxicity of Louisiana Crude Oil (LSC) and Chemically Dispersed LSC of Two Gulf of Mexico Aquatic Test Species*, U.S. Environmental Protection Agency, Office of Research and Development. Available at http://www.epa.gov/bpspill/reports/phase2dispersant-toxtest.pdf. Accessed June 3, 2011.

Hemmerling, S.A., and C.E. Colton, 2004, *Environmental Justice Considerations in Lafourche Parish, Louisiana*, OCS Study MMS 2003-038, prepared by Louisiana State University Coastal Studies Institute, Baton Rouge, La., for Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La., Jan.

Heneman, B., and the Center for Environmental Education, 1988, *Persistent Marine Debris in the North Sea, Northwest Atlantic Ocean, Wider Caribbean Area, and the West Coast of Baja California. Final Report*, Contract MM3309598-5, Marine Mammal Commission, Washington, D.C.

Hensel, P., et al., 2002, *Oil Spills in Mangroves, Planning and Response Considerations*, National Oceanic and Atmospheric Administration, Office of Response and Restoration.

Hepler, K.R., P.A. Hansen, and D.R. Bernard, 1993, *Impact of Oil Spilled from the* Exxon Valdez *on Survival and Growth of Dolly Varden and Cutthroat Trout in Prince William Sound, Alaska*, Exxon Valdez *Oil Spill State/Federal Natural Resource Damage Assessment Final Repor*t, Fish/Shellfish Study Number 5, Restoration Study Number 90, Alaska Department of Fish and Game, Division of Sport Fish, Anchorage, Alaska.

Herkhof, D., 2011, *Air Emissions Table for Five-Year DEIS*, personal communication from D. Herkhof (Bureau of Ocean Energy Management, Regulation and Enforcement, Herndon, Va.) to Y.-S. Chang (Argonne National Laboratory, Argonne, Ill.), Sept. 2.

Hess, G., 2011, "Congress Stalls on Oil-Spill Response," *Chemical and Engineering News* 89(34):31–33.

Hiett, R.L., and J.W. Milon, 2002, *Economic Impact of Recreational Fishing and Diving Associated with Offshore Oil and Gas Structures in the Gulf of Mexico*, final report, OCS Study MMS 2002-010, prepared by QuanTech, Inc. for the MMS, Gulf of Mexico OCS Region, New Orleans, La. Available at http://www.gomr.mms.gov/PI/PDFImages/ESPIS/2/3058.pdf. Accessed June 22, 2011.

Highsmith, R.C., S.M. Saupe, and A.L. Blanchard, 2001, *Kachemak Bay Experimental and Monitoring Studies: Recruitment, Succession, and Recovery in Seasonally Disturbed Rocky-Intertidal Habitat*, OCS Study MMS 2001-053, MMS, Alaska OCS Region, Anchorage, Alaska.

Hildebrand, J., 2004, *Sources of Anthropogenic Sound in the Marine Environment*, International Policy Workshop on Sound and Marine Mammals, London, September 28–30.

Hildebrand, J.A., 2005, "Impacts of Anthropogenic Sound," pp. 101–124in *Marine Mammal Research: Conservation beyond Crisis*, J.E. Reynolds, W.F. Perrin, R.R. Reeve, S. Montgomery, and T.J. Ragen (eds.), The Johns Hopkins University Press, Baltimore, Md. Available at http://www.awionline.org/ht/a/GetDocumentAction/i/10158. Accessed July 11, 2011.

Hill, P.S., and D.P. DeMaster, 1998, *Alaska Marine Mammal Stock Assessments 1998*, National Marine Mammal Laboratory, Alaska Fisheries Science Center, Seattle, Wash.

Hitchcock, C., et al., 2010, "GIS-Based Assessment of Submarine Mudflow Hazard Offshore of the Mississippi Delta," in *Submarine Mass Movements and Their Consequences, Advances in Natural and Technological Hazards Research*, D. Mosher et al. (eds.), Springer Science+Business Media.

Hoff, R., 1995, *Responding to Oil Spills in Coastal Marshes: The Fine Line between Help and Hindrance*, HAZMAT Report 96-1, National Oceanic and Atmospheric Administration, Hazardous Materials Response and Assessment Division.

Hoffecker, J.F., and S.A. Elias, 2003, "Environment and Archaeology in Beringia," *Evolutionary Anthropology* 12:34–49.

Holland-Bartels, L., and J.J. Kolak, 2011, "Oil-spill, Risk, Reponse, and Impact," in *An Evaluation of the Science Needs to Inform Decisions on Outer Continental Shelf Energy Development in the Chukchi and Beaufort Seas*, Chapter 5. Alaska: U.S. Geological Survey Circular 1370, p. 13–40.

Holliday, D.V., R.E. Pieper, M.E. Clarke, and C.F. Greenlaw, 1987, *The Effects of Airgun Energy Releases on the Eggs, Larvae, and Adults of the Northern Anchovy* (Engraulis mordax), API Publication 4453. Report by Tracor Applied Sciences for American Petroleum Institute, Washington, D.C.

Hom, W., et al., 1999, "Measuring the Exposure of Subsistence Fish and Marine Mammal Species to Aromatic Compounds following the Exxon Valdez Oil Spill," in *Evaluating and Communicating Subsistence Seafood Safety in a Cross-Cultural Context*, L.J. Field, J.A. Fall, T.S. Nighswander, N. Peacock, and U. Varanasi (eds), SETAC Press, Pensacola, Fla.

Hooker, S.K., T.L. Metcalfe, C.D. Metcalfe, C.M. Angell, J.Y. Wilson, M.J. Moore, and H. Whitehead, 2008, "Changes in Persistent Contaminant Concentration CYP1A1 Protein Expression in Biopsy Samples from Northern Bottlenose Whales, *Hyperoodon ampullatus*, Following the Onset of Nearby Oil and Gas Development," *Environmental Pollution* 151:205–216.

Hoose, P.J., and J. Whitney, 1980, *Map Showing Selected Geologic Features of Outer Continental Shelf, Shelikof Strait, Alaska*, U.S. Geological Survey Open File Report 80-2035.

Hopkins, D.M., and R.W. Hartz, 1978, *Coastal Morphology, Coastal Erosion, and Barrier Islands of the Beaufort Sea Coast, Alaska*, Open File Report 78-1063, U.S. Geological Survey.

Hopkinson, C., 2010, *Outcome/Guidance from Georgia Sea Grant Program: Current Status of BP Oil Spill*, Georgia Sea Grant Oil Spill Update, August 17.

Howarth, R.W., 1991, "Assessing the Ecological Effects of Oil Pollution from Outer Continental Shelf Oil Production," *American Fisheries Society Symposium* 11:1–8.

Hsiao, S.I., D.W. Kittle, and M.G. Foy, 1978, "Effects of Crude Oils and the Oil Dispersant Corexit on Primary Production of Arctic Marine Phytoplankton and Seaweed," *Environmental Pollution* 15:209–221.

Hsu, S.A., and B.W. Blanchard, 2005, *Visibility and Atmospheric Dispersion Capability over the Northern Gulf of Mexico: Estimations and Observations of Boundary Layer Parameters*, OCS Study MMS 2005-008, prepared by Coastal Marine Institute, Louisiana State University, Baton Rouge, La., for MMS, Gulf of Mexico OCS Region, New Orleans, La., March.

Huffman, A.R., and J.P. Castagna, 2001, "The Petrophysical Basis for Shallow-Water Flow Prediction Using Multicomponent Seismic Data," *The Leading Edge* 20(9):1030–1035.

Hunter, J.A., and G.O. Hobson, 1974, "Seismic Refraction Method of Detecting Subsea Bottom Permafrost, the Coast and Shelf of the Beaufort Sea," *Proceedings of a Symposium on Beaufort Sea Coast and Shelf Research*, J.C. Reed and J.E. Sater (Eds.), Arctic Institute of North America, Arlington Va.

IACMST (Inter-Agency Committee on Marine Science and Technology), 2006, *Underwater Sound and Marine Life*, Report No. 6, report of the Inter-Agency Committee on Marine Science and Technology Working Group, Southampton, U.K.

IATA (International Air Transport Association), 2011, *Fuel Efficiency*. Available at http://www.iata.org/whatwedo/environment/Pages/fuel_efficiency.aspx. Accessed August 20, 2011.

IMG Golder Corp., 2004, *Review of Potential Effects of Dredging in the Beaufort Sea*, prepared for the Fisheries and Oceans Canada, Inuvik, Northwest Territories, June.

Impact Assessment, Inc., 1990, *Northern Institutional Profile Analysis: Beaufort Sea*, OCS Study MMS 90-0023, MMS, Alaska OCS Region, Anchorage, Alaska.

Impact Assessment, Inc., 2001, Exxon Valdez *Oil Spill, Cleanup and Litigation: A Collection of Social-Impact Information and Analysis*, OCS Study MMS 2001-058, MMS, Alaska OCS Region, Anchorage, Alaska.

Invasive Species Advisory Committee, 2010, *Invasive Species and Climate Change*, White Paper. U.S. Department of the Interior, Invasive Species Advisory Committee, Washington, D.C. Available at http://www.invasivespecies.gov/ISAC/White%20Papers/Climate_Change_White_Paper_FINAL_VERSION.pdf.

IPCC (International Panel on Climate Change), 2007, *Climate Change 2007: Synthesis Report, Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*, R.K. Pachauri and A. Reisinger, (eds.), Geneva, Switzerland. Available at http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr.pdf. Accessed April 22, 2011.

Irvine, G., 2000, "Persistence of Spilled Oil on Shores and Its Effects on Biota," in *Seas at the Millennium: An Environmental Evaluation, Volume III: Global Issues and Processes*, Elsevier Science Ltd., Oxford.

Jay, C.V., and A.S. Fischbach, 2008, *Pacific Walrus Response to Arctic Sea Ice Losses*, fact sheet, USGS, Alaska Science Center, Anchorage, Alaska, May. Available at http://pubs.usgs.gov/fs/2008/3041/pdf/fs20083041.pdf. Accessed May 26, 2011.

Jensen, A.S., and G.K. Silber, 2004, *Large Whale Ship Strike Database*, NOAA Technical Memorandum NMFS-OPR-January 2004, Office of Protected Resources, National Marine Fisheries Service, National Oceanic and Atmospheric Administration, Silver Spring, Md.

Jeong, C., and V.G. Panchang, 2008, "Measurement-Based Estimates of Extreme Wave Conditions for the Gulf of Mexico," *Proceedings of Oceans 2008*. Available at http://ieeexplore.ieee.org/stamp/stamp.jsp?tp=&arnumber=5151997&isnumber=5151799. Accessed May 18, 2011.

Jernelöv, A., 2010, "The Threats from Oil Spills: Now, Then, and in the Future," *Ambio* 39:353–366.

Ji, Z.-G., 2004, "Use of Physical Sciences in Support of Environmental Management," *Environmental Management* 34(2):159–169

Jochens, A.E., and S.F. DiMarco, 2008, "Physical Oceanographic Conditions in the Deepwater Gulf of Mexico in Summer 2000-2000," *Deep-Sea Research Part II: Topical Studies in Oceanography* 55(24-26):2541–2554.

Jochens, A.E., S.F. DiMarco, W.D. Nowlin, Jr., R.O. Reid, and M.C. Kennicutt II, 2002, *Northeastern Gulf of Mexico Chemical Oceanography and Hydrography Study*, OCS Study MMS 2002-055, MMS, Gulf of Mexico OCS Region, New Orleans, La.

Johannesen, O., M. Miles, and E. Bjørgo, 1995, "The Arctic's Shrinking Ice," *Nature* 376:126–127.

Johnson, S.R., 1994, *The Status of Lesser Snow Geese in the Sagavanirktok River Delta Area, Alaska: 1980–1993*. Prepared by LGL Alaska Research Associates, Inc., for BP Exploration (Alaska), Inc., Anchorage, AK.

Johnson, S.R., 2000, "Pacific Eider," *Natural History of An Arctic Oil Field: Development and the Biota*. J.C. Truett and S.R. Johnson (eds), Academic Press, San Diego, CA.

Johnson, S.R., R.J. Rodrigues, and R.H. Pollard, 1993a, *Video Analysis of Predators and Nesting Snow Geese on Howe Island, Sagavanirktok River Delta, Alaska, 1992*. Report to BP Exploration (Alaska) Inc., by LGL Alaska Research Associates, Inc.

Johnson, S.R., D. Wiggins, and R.J. Rodrigues, 1993b, *Use of Gravel Causeways by Nesting Common Eiders, Beaufort Sea, Alaska, 1992*. Report to BP Exploration (Alaska) Inc., by LGL Alaska Research Associates, Inc.

Jones, K.F., and E.L. Andreas, 2009, *Sea Spray Icing of Drilling and Production Platforms*, ERDC/CRREL TR-09-3, USACE, CRREL (Cold Regions Research and Engineering Laboratory), Hanover, N.H.

Jorgenson, M.T., and J. Brown, 2005, "Classification of the Alaskan Beaufort Sea Coast and Estimation of Carbon and Sediment Inputs from Coastal Erosion," *Geo-Mar Lett* 25:69–80.

Judd, A.G., and M. Hovland, 2007, *Seabed Fluid Flow: The Impact of Geology, Biology and the Marine Environment*, Cambridge University Press.

Kaiser, M.J., and A.G. Pulsipher, 2007, "The Impact of Weather and Ocean Forecasting on Hydrocarbon Production and Pollution Management in the Gulf of Mexico," *Energy Policy* 35:966–983.

Karl, K.J., 2007, *Gulf of Mexico Oil and Gas Production Forecast: 2007-2016*, MMS Report 2007-020, Gulf of Mexico Region, May.

Karl, K.J., R.D. Baud, A.G. Boice, R. Bongiovanni, T.M. DeCort, R.P. Desselles, and E.G. Kazanis, 2007, *Gulf of Mexico Oil and Gas Production Forecast: 2007–2016*, MMS Report 2007-020, Gulf of Mexico OCS Region, May.

Kastak, D., and R.J. Schusterman, 1998, "Low-Frequency Amphibious Hearing in Pinnipeds: Methods, Measurements, Noise and Ecology," *Journal of the Acoustical Society of America* 103:2216–2228.

Kay, J.E., M.M. Holland, and A. Jahn, 2011, "Inter-annual to Multi-decadal Arctic Sea Ice Extent Trends in a Warming World," *Geophysical Research Letters* 38:L15708.

Keenan, S.F., M.C. Benfield, and J.K. Blackburn, 2007, "Importance of the Artificial Light Field around Offshore Petroleum Platforms for the Associated Fish Community," *Marine Ecology Progress Series* 331:219–231.

Keller, B.D., and J.B.C. Jackson, 1993, *Long-Term Assessment of the Oil Spill at Bahia Las Minas, Panama*, Synthesis Report, Volume I: Executive Summary OCS Study MMS93-0047, U.S. Department of the Interior, Minerals Management Service, Gulk of Mexico, OCS Region, New Orleans, La.

Keller, J.M., J.R. Kucklick, C.A. Harms, and P.D. McClellan-Green, 2004, "Organochlorine Contaminants in Sea Turtles: Correlations between Whole Blood and Fat," *Environmental Toxicology and Chemistry* 23:726–738.

Kelly, B.P., J.J. Burns, and L.T. Quakenbush, 1988, "Response of Ringed Seals (*Phoca hispida*) to Noise Disturbance," pp. 27–38 in *Port and Ocean Engineering Under Arctic Conditions, Vol. 2*, W.M. Sackinger and M.O. Jeffires (eds.), Geophysical Institute, University of Alaska, Fairbanks, Alaska.

Kenai Peninsula Borough, 2005, *Comprehensive Plan*. Available at http://www.borough.kenai.ak.us/planningdept/plan/2005/plan.htm. Accessed April 26, 2011.

Kenai Peninsula Borough, 2008. *Coastal Management Plan*, June. Available at http://www.kenairivercenter.org/Agencies/coastal/2008CMP/CZM_content_full.pdf. Accessed April 26, 2010.

Kennicutt, M.C. (ed.), 1995, *Gulf of Mexico Offshore Operations Monitoring Experiment, Phase I: Sublethal Responses to Contaminant Exposure*, Final Report, OCS Study MMS 95-0045, MMS, Gulf of Mexico OCS Region New Orleans, La.

Kennicutt II, M.C., and J.M. Brooks, 1990, "Recognition of Areas Effected [Affected – sic] by Petroleum Seepage: Northern Gulf of Mexico Continental Slope," *Geo-Marine Letters* 10:221–224.

Ketten, D.R., 1998, *Marine Mammal Auditory Systems: A Summary of Audiometric and Anatomical Data and Its Implications for Underwater Acoustic Impacts*, NOAA Technical Memorandum NMFS-SWFSC-256.

Kienle, J., Z. Kowalik, and T.S. Murty, 1986, "Tsunamis Generated by Eruptions from Mount St. Augustine Volcano, Alaska," *Science* 236:1442–1447.

King, J.A., and G.A. Sanger, 1979, "Oil Vulnerability Index for Marine Oriented Birds. Conservation of Marine Birds in Northern North America," *Wildlife Research Report II*, J.C. Bartonek and D.N. Nettleship (eds.), U.S. Fish and Wildlife Service, U.S. Department of the Interior, Washington, D.C.

Kingsford, M.J., 1996, "Influence of Pollutants and Oceanography on Abundance and Deformities of Wild Fish Larvae," pp. 235–256 in *Detecting Ecological Impacts, Concepts and Applications in Coastal Habitats*, R.J. Schmitt and C.W. Osenberg (eds.), Academic Press, San Diego, Calif.

Kinkhart, E., K. Pitcher, and G. Blundell, 2008, *Alaska Wildlife Notebook Series: Harbor Seal*, Alaska Department of Fish and Game, Juneau, Alaska. Available at http://www.adfg.alaska.gov/static/education/wns/harbor_seal.pdf. Accessed April 11, 2011.

Klem, D., Jr., 1989, "Bird–Window Collisions," *Wilson Bulletin* 101: 606–620.

Klem, D., Jr., 1990, "Collisions between Birds and Windows: Mortality and Prevention," *Journal of Field Ornithology* 61: 120–128.

Klima, E.F., G.R. Gitschlag, and M.L. Renaud, 1988, "Impacts of the Explosive Removal of Offshore Petroleum Platforms on Sea Turtles and Dolphins," *Mar. Fish. Rev.* 50(3):33–42.

Kovacs, A., and D.S. Sodhi, 1980, "Shore Ice Pile-up and Ride-up: Field Observations, Models, Theoretical Analyses," *Cold Regions Science and Technology* 2:210–288.

Kowalik, Z., 1984, "Storm Surges in the Beaufort and Chukchi Seas," *Journal of Geophysical Research* 89(C10):10,570–10,578.

Kowalik, Z., and A. Proshutinsky, 2010, "Tsunami-Tide Interactions: A Cook Inlet Case Study," *Continental Shelf Research* 30:633–642.

KPB (Kenai Peninsula Borough), 2011, "Tsunamis and Seiches," Chapter 6 in *KPB All-Hazard Mitigation Plan.* Available at http://www.borough.kenai.ak.us/emergency/hazmit/plan.htm. Accessed May 25, 2011.

Krost, P., M. Bernhard, F. Werner, and W. Hukriede, 1990, "Otter Trawl Tracks in Kiel Bay (Western Baltic) Mapped by Side-Scan Sonar," *Meereforschung* 32:344–353.

Kryter, K.D., 1985, *The Effects of Noise on Man*, 2nd Ed. Academic Press, Orlando.

Kujawinski, E.B., M.C. Kido Soule, D.L. Valentine, A.K. Boysen, K. Longnecker, and M.C. Redmond, 2011, "Fate of Dispersants Associated with the Deepwater Horizon Oil Spill," *Environmental Science and Technology* 45:1298–1306.

Kvenvolden, K.A., and C.K. Cooper, 2003, "Natural Seepage of Crude Oil into the Marine Environment," *Geo-Marine Letters* 23:140–146.

Kyle, R.E., and T.P. Brabets, 2001, *Water Temperature of Streams in the Cook Inlet Basin, Alaska, and Implications of Climate Change*, Water Resources Investigations Report 01-4109, U.S. Geological Survey.

Kyle, R.J., 2002, "A Century of Fire and Brimstone: the Rise and Fall of the Frasch Sulphur Industry of the Gulf of Mexico Basin, " in *Industrial Minerals and Extractive Industry Geology*, P.W. Scott and C.M. Bristow (editors), Geological Society of London.

Labay, K., and P.J. Haeussler, 2001, *GIS Coverages of the Castle Mountain Fault, South Central Alaska,* U.S. Geological Survey Open File Report 01-504.

Laist, D.W., A.R. Knowlton, J.G. Mead, A.S. Collet, and M. Podesta, 2001, "Collisions between Ships and Whales," *Marine Mammal Science* 17(1): 35–75.

Lance, B.K., D.B. Irons, S.J. Kendall, and L.L. McDonald, 2001, "An Evaluation of Marine Bird Population Trends Following the *Exxon Valdez* Oil Spill, Prince William Sound, Alaska," *Marine Pollution Bulletin* 42: 298–309.

Lange, J.L., D.A. Schwartz, B.N. Doebbeling, J.M. Heller, and P.S. Thorne, 2002, "Exposures to the Kuwait Oil Fires and Their Association with Asthma and Bronchitis among Gulf War Veterans," *Environ. Health Perspect.* 110(11):1141–1146.

Larkin, R.P., 1996, *Effects of Military Noise on Wildlife: a Literature Review*, Technical Report 96/21, U.S. Army Construction Engineering Research Laboratory, Champaign, Ill.

Laws, E.A., 1993, "Oil Pollution." Chapter 13 in *Aquatic Pollution, An Introductory Text*. 2nd ed. John Wiley and Sons, Inc.

LCWCRTF (Louisiana Coastal Wetlands Conservation and Restoration Task Force), 1998, *Coast 2050: Toward a Sustainable Coastal Louisiana, Report of the Louisiana Coastal Wetlands Conservation and Restoration Task Force and the Wetlands Conservation and Restoration Authority*, Louisiana Department of Natural Resources, Baton Rouge, La.

LCWCRTF, 2001, *The 2000 Evaluation Report to the U.S. Congress on the Effectiveness of Louisiana Coastal Wetland Restoration Projects*, Louisiana Department of Natural Resources, Baton Rouge, La.

LCWCRTF, 2003, *The 2003 Evaluation Report to the U.S. Congress on the Effectiveness of Coastal Wetland Planning, Protection, and Restoration Act Projects*, Louisiana Department of Natural Resources, Baton Rouge, La.

Leber, J., 2010, "Economics Improve for First Commercial Cellulose Ethanol Plants," *ClimateWire*. Available at http://www.nytimes.com/cwire/2010/02/16/16climatewire-economics-improve-for-first-commercial-cellu-93478.html. Accessed February 16, 2010.

Lee, D.S., and M. Socci, 1989, *Potential Impact of Oil Spills on Seabirds and Selected Other Oceanic Vertebrates Off the North Carolina Coast*. NCSM Biological Survey Report No. 90-1. North Carolina State Museum of Natural Sciences, Raleigh, NC.

Lee, R.F., and D.S. Page, 1997, "Petroleum Hydrocarbons and Their Effects in Subtidal Regions after Major Oil Spills," *Marine Pollution Bulletin* 34:928–940.

Leighton, F.A., 1990, *The Toxicity of Petroleum Oils to Birds: An Overview*. Oil Symposium, Herndon, VA.

Lemke, P., J. Ren, R.B. Alley, I. Allison, J. Carrasco, G. Flato, Y. Fujii, G. Kaser, P. Mote, R.H. Thomas, and T. Zhang, 2007, "Observations: Changes in Snow, Ice and Frozen Ground," in *Climate Change 2007: The Physical Science Basis, Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*, S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.), Cambridge University Press, Cambridge, U.K., and New York, N.Y.

Lesage, V., C. Barrette, M.C.S. Kingsley, and B. Sjare, 1999, "The Effects of Vessel Noise on the Vocal Behavior of Belugas in the St. Lawrence River Estuary, Canada," *Marine Mammal Science* 15:65–84.

Lewis, J.P., R. Sellers, S. Miller, D. McAllister, and D. Calkins, 1991, *Assessment of the Exxon Valdez Oil Spill on Brown Bears on the Alaska Peninsula*, Terrestrial Mammal Study Number Four, Final Report.

Lessard-Pilon, S., M.D. Porter, E.E. Cordes, I.R. MacDonald, and C.R. Fisher, 2010, "Community Composition and Temporal Change at Deep Gulf of Mexico Cold Seeps," *Deep-Sea Research II* 57:1891–1903.

Lincoln, F.C., S.R. Peterson, and J.L. Zimmerman, 1998, *Migration of Birds*. Circular 16, U.S. Department of the Interior, U.S. Fish and Wildlife Service, Washington, D.C.

Linnell, J.D.C., J.E. Swenson, R. Andersen, and B. Barnes, 2000, "How Vulnerable Are Denning Bears to Disturbance?" *Wildlife Society Bulletin* 28:400–413.

Liu, J., 2011, personal communication via e-mail from J. Liu (Louisiana Department of Environmental Quality, Baton Rouge, La.) to Y.-S. Chang (Argonne National Laboratory, Argonne, Ill.), July 22.

Ljungblad, D.K., B. Würsig, S.L. Swartz, and J.M. Keene, 1988, "Observations on the Behavioral Responses of Bowhead Whales (*Balaena mysticetus*) to Active Geophysical Vessels in the Alaskan Beaufort Sea," *Arctic* 41(3):183–194.

Lloyd, J.M. et al., 1991, *Part I: 1988 and 1989 Florida Petroleum Production and Exploration Including Florida Petroleum Reserve Estimates and Part II: Petroleum Exploration and Development Policies in Florida – Response to Public Concern for Sensitive Environments*, Information Circular No. 107, Florida Department of Natural Resources, published for the Florida Geological Survey, June.

Loehefener, R.R., W. Hoggard, C.L. Roden, K.D. Mullin, and C.M. Rogers, 1989, "Petroleum Structures and the Distribution of Sea Turtles," in *Proceedings Spring Ternary Gulf of Mexico Studies Meeting*, Minerals Management Service.

Lohoefener, R., W. Hoggard, K. Mullin, C. Roden, and C. Rogers, 1990, *Association of Sea Turtles with Petroleum Platforms in the North-Central Gulf of Mexico*, OCS Study/MMS 90-00025, Minerals Management Service, Gulf of Mexico OCS Regional Office, New Orleans, La.

Longwell, A.C., 1977, "A Genetic Look at Fish Eggs and Oil," *Oceanus* 20(4):46–58.

Lorne, J.K., and M. Salmon, 2007, "Effects of Exposure to Artificial Lighting on Orientation of Hatchling Sea Turtles on the Beach and in the Ocean," *Endangered Species Research* 3:23–30.

Loughlin, T.R., B.E. Ballachey, and B.A. Wright, 1996, "Overview of Studies to Determine Injury Caused by the Exxon Valdez Oil Spill to Marine Mammals," pp. 798–808 in *Proceedings of the* Exxon Valdez *Oil Spill Symposium*, S.D. Rice, R.B. Spies, D.A. Wolfe, and B.A. Wright (eds.), American Fisheries Society Symposium 18, Bethesda, Md.

Loya, Y., and B. Rinkevitch, 1980, "Effects of Oil Pollution on Coral Reef Communities," *Marine Ecology Progress Series* 3:167–180.

Lu, S., G.A. McMechan, and A. Liaw, 2005, "Identification of Shallow-Water-Flow Sands by V_p Inversion of Conventional 3D Seismic Data," *Geophysics* 70(5):29–37.

Lubchenco, J., M. McNutt, B. Lehr, M. Sogge, M. Miller, S. Hammond, and W. Conner, 2010, "BP Deepwater Horizon Oil Budget: What Happened To the Oil?." Available at http://www.restorethegulf.gov/sites/default/files/imported_pdfs/posted/2931/Oil_Budget_description_8_3_FINAL.844091.pdf. Accessed July 21, 2011.

Lugo-Fernandez, A., 2007, "Is the Loop Current a Chaotic Oscillator?" *Journal of Physical Oceanography* 37(6):1455–1469.

Lugo-Fernandez, A., and R.E. Green, 2011, "Mapping the Intricacies of the Gulf of Mexico's Circulation," *EOS* 92(3):21–22.

Lugo-Fernandez, A., and R.R. Leben, 2010, "On the Linear Relationship between Loop Current Retreat Latitude and Eddy Separation Period," *Journal of Physical Oceanography* 40(12):2778–2784.

Lukina, L., S. Matisheva, and V. Shapunov, 1996, "Ecological Monitoring of the Captivity Sites as a Means of Studying the Influence of Contaminated Environment on Cetaceans," pp. 52–54 in *Proceedings, First International Symposium on the Marine Mammals of the Black Sea*, B. Öztürk (ed.), June 27–30, 1994, Istanbul, Turkey.

Lutcavage, M.E., P.L. Lutz, G.D. Bossart, and D.M. Hudson, 1995, "Physiologic and Clinicopathologic Effects of Crude Oil on Loggerhead Sea Turtles," *Archives of Environmental Contamination and Toxicology* 28:417–422.

Lutcavage, M.E., P. Plotkin, B. Witherington, and P.L. Lutz, 1997, "Human Impacts on Sea Turtle Survival," pp. 387–410 in *The Biology of Sea Turtles*, P.L. Lutz and J.A. Musick (eds.), CRC Press, Boca Raton, Fla.

Luton, H., and R. Cluck, 2003, *Social Impact Assessment of Offshore Oil and Gas in the Gulf of Mexico*, draft, Mineral Management Service.

Lutz, P.L., and M. Lutcavage, 1989, "The Effects of Petroleum on Sea Turtles: Applicability to Kemp's Ridley," in *Proceedings of the First International Symposium on Kemp's Ridley Sea Turtle Biology, Conservation, and Management*, C.W. Caillouet and A.M. Landry (eds.), TAMU-SG-89-105.

Lynch, A.H., L.R. Lestak, P. Uotila, E.N. Cassano, and L. Xie, 2008, "A Factorial Analysis of Storm Surge Flooding in Barrow, Alaska," *Monthly Weather Review* 136(3):898–912.

Macdonald, K.B., 1977, "Plant and Animal Communities of Pacific North American Salt Marshes," pp. 167–192 in *Wet Coastal Ecosystems. Ecosystems of the World*, V.J. Chapman (ed.), Elsevier, Amsterdam, the Netherlands.

Macreadie, P., A. Fowler, and D. Booth, 2011, "Rigs-to-Reefs: Will the Deep Sea Benefit from Artificial Habitat?," *Frontiers in Ecology and the Environment* 110324084539019. Available at http://www.esajournals.org/doi/abs/10.1890/100112. Accessed June 21, 2011.

Madsen, P.T., B. Mohl, B.K. Nielsen, and M. Wahlberg, 2002, "Male Sperm Whale Behaviour During Exposures to Distant Seismic Survey Pulses," *Aquatic Mammals* 28(3):231–240.

Maffione, R.A., 2000, "Deep Problems in Optically Shallow Waters," *Backscatter* 11:28–31.

Mahoney, A., H. Eicken, A.G. Gaylord, and L. Shapiro, 2007, "Alaska Landfast Sea Ice: Links with Bathymetry and Atmospheric Circulation," *Journal of Geophysical Research* 112:C02001.

Maier, J.A.K., S.M. Murphy, and M.D. Smith, 1998, "Response of Caribou to Overflights by Low-altitude Jet Aircraft," *Journal of Wildlife Management* 62:752–766.

Malins, D.C. (ed.), 1977, *Effects of Petroleum on Arctic and Subarctic Marine Environments and Organisms, Vol. II, Biological Effects*, Academic Press, New York, N.Y.

Malm, W.C., 1999, *Introduction to Visibility*, Cooperative Institute for Research in the Atmosphere (CIRA), NPS Visibility Program, Colorado State University, Fort Collins, Colo., May.

Malm, W.C., 2000, *Spatial and Seasonal Patterns and Temporal Variability of Haze and Its Constituents in the United States, Report III*, Colorado State University, Fort Collins, May.

Malme, C.I., P.R. Miles, C.W. Clark, P. Tyack, and J.E. Bird, 1984, *Investigations of the Potential Effects of Underwater Noise from Petroleum Industry Activities on Migrating Gray Whale Behavior, Phase II: January 1984 Migration*, BBN Rep. 5586, report for MMS, Anchorage, Alaska, NTIS PB86-218377.

Malme, C.I., P.R. Miles, G.W. Miller, W.J. Richardson, D.G. Roseneau, D.H. Thomson, and C.R. Greene, Jr., 1989, *Analysis and Ranking of the Acoustic Disturbance Potential of Petroleum Industry Activities and Other Sources of Noise in the Environment of Marine Mammals in Alaska*, OCS Study MMS 89-0006, Minerals Management Service, Anchorage, Alaska.

Marine Mammal Commission, 2003, *Annual Report to Congress 2002*, Bethesda, Md.

Marine Mammal Commission, 2004, *Annual Report to Congress 2003*, Bethesda, Md.

Markus, T., J.C. Stroeve, and J. Miller, 2009, "Recent Changes in Arctic Sea Ice Melt Onset, Freeze Up, and Melt Season Length," *Journal of Geophysical Research* 114(C12).

Mars, J., and D. Houseknecht, 2007, "Quantitative Remote Sensing Study Indicates Doubling of Coastal Erosion Rate in Past 50 yr along a Segment of the Arctic Coast of Alaska," *Geology* 35:583–586.

Mason, W.T., Jr., and J.P. Claxton, 1993, "Foods of the Gulf Sturgeon in the Suwanee River, Florida," *Transactions of the American Fisheries Society* 122:378–385.

Matkin, C.O., E.L. Saulitis, G.M. Ellis, P. Olesiuk, and S.D. Rice, 2008, "Ongoing Population-level Impacts on Killer Whales *Orcinus orca* following the 'Exxon Valdez' Oil Spill in Prince William Sound, Alaska," *Marine Ecology Progress Series* 356:269–281.

McCammon, M., P. Mundy, and B. Spies, 2002, *The Gulf of Alaska Ecosystem Monitoring and Research (GEM) Program Document*, *Exxon Valdez* Oil Spill Trustee Council, July 9.

McCauley, R.D., J. Fewtrell, A.J. Duncan, C. Jenner, M-N. Jenner, J.D. Penrose, R.I.T. Prince, A. Adhitya, J. Murdoch, and K. McCabe, 2000, "Marine Seismic Surveys – A Study of Environmental Implications," *APPEA Journal* 40:692–708.

McCauley, R.D., J. Fewtrell, A.J. Duncan, C. Jenner, M-N. Jenner, J.D. Penrose, R.I.T. Prince, A. Adhitya, J. Murdoch, and K. McCabe, 2000, "Marine Seismic Surveys: A Study of Environmental Implications," *Australian Petroleum Production & Exploration Association Journal* 2000:692–708.

McClory, J., and T. Gotthardt, 2008, *Non-native and Invasive Animals of Alaska: A Comprehensive List and Select Species Status Reports – Final Report*, Alaska Natural Heritage Program, Anchorage, Alaska, January. Available at http://www.adfg.alaska.gov/static/species/nonnative/invasive/pdfs/invasivespp-report.pdf. Accessed September 6, 2011.

McColluch, D.S., 1966, *Slide-Induced Waves, Seiching and Ground Fracturing Caused by the Earthquake of March 27, 1964 at Kenai Lake, Alaska*, U.S. Geological Survey Professional Paper 543-A.

McDonald, M.A., J.A. Hildebrand, and S.C. Webb, 1995, "Blue and Fin Whales Observed on a Seafloor Array in the Northeast Pacific," *Journal of the Acoustical Society of America* 98(2):712–721.

McGrattan, K.B., et al., 1995, "Smoke Plume Trajectory from In Situ Burning of Crude Oil in Alaska – Field Experiments," in *Proceedings of the Eighteenth Arctic and Marine Oilspill Program (AMOP) Technical Seminar*, Vol. 2, June 14–16, 1995, Edmonton, Alberta, Canada.

McGurk, M.D., and E.D. Brown, 1996, "Egg–Larval Mortality of Pacific Herring in Prince William Sound, Alaska, after the *Exxon Valdez* Oil Spill," *Canadian Journal of Fisheries and Aquatic Sciences* 53:2343–2354.

McKechnie, A.M., and D.N. Gladwin, 1993, *Aircraft Overflight Effects on Wildlife Resources*, Report NPOA-93-8, HMMH-290940.22 (NTIS Number: PB94-149994), November 1993.

McKone, K.P., N.D. Walker, and E. Weeks, 2007, *Full-Water Column Currents Near the Sigsbee Escarpment (91-92° W. longitude) and Relationships with the Loop Current and Associated Warm-and Cold-Core Eddies*, OCS Study, MMS 2007-058, MMS, Gulf of Mexico OCS Region, Baton Rouge, La.

McNutt, M., R. Camilli, G. Guthrie, H. Hsieh, V. Labson, B. Lehr, D. Maclay, A. Ratzel, and M. Sogge, 2011, *Assessment of Flow Rate Estimates for the Deepwater Horizon/Macondo Well Oil Spill*, Flow Rate Technical Group, report to the National Incident Command, Interagency Solutions Group, U.S. Department of Interior, Washington, D.C. Available at http://www.doi.gov/deepwaterhorizon/loader.cfm?csModule=security/getfile&PageID=237763. Accessed September 20, 2011.

Mendelssohn, I., and Q. Lin (eds.), 2003, *Coastal Marine Institute, Development of Bioremediation for Oil Spill Cleanup in Coastal Wetlands*, prepared by Louisiana State University, Wetland Biogeochemistry Institute, Center for Coastal, Energy, and Environmental Resources, for Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La.

Miksis-Olds, J.L., P.L. Donaghay, J.H. Miller, P.L. Tyack, and J.A. Nystuen, 2007, "Noise Level Correlates with Manatee Use of Foraging Habitats," *Journal of the Acoustical Society of America* 121:3011–3020.

Miller, F.L., and A. Gunn, 1979, *Responses of Peary Caribou and Muskoxen to Helicopter Harassment*, Prince of Wales Island, Northwest Territories, July−August 1976, Canadian Wildlife Service Progress Notes, No. 79.

Miller, F.L., and A. Gunn, 1980, "Behavioral Responses of Muskox Herds to Simulation of Cargo Slinging by Helicopter, Northwest Territories," *Canadian Field Naturalist* 94:52–60.

Miller, M.W., K.C. Jensen, W.E. Grant, and M.W. Weller, 1994, "A Simulation Model of Helicopter Disturbance of Molting Pacific Black Brant," *Ecological Modelling* 73 (3/4): 293–309.

Miller, W.W., 1994, "Route Selection to Minimize Helicopter Disturbance of Molting Pacific Black Brant: A Simulation," *Arctic* 47(4): 341–349.

Milton, S.L., A.A. Schulman, and P.L. Lutz, 1997, "The Effect of Beach Nourishment with Aragonite Versus Silicate Sand on Beach Temperature and Loggerhead Sea Turtle Nesting Success," *Journal of Coastal Research* 13:904–915.

MMS (Minerals Management Service), undated, *Leasing Oil and Natural Gas Resources, Outer Continental Shelf*, U.S. Department of the Interior. Available at http://www.boemre.gov/ld/PDFs/GreenBook-LeasingDocument.pdf. Accessed September 15, 2011.

MMS, 1985, *Geologic Report for the Beaufort Sea Planning Area, Alaska*, OCS Report, MMS 85-0111, Alaska OCS Region, Anchorage, Alaska.

MMS, 1987, *Geologic Report for the Chukchi Sea Planning Area, Alaska*, OCS Report 87-0046, Alaska OCS Region, Anchorage.

MMS, 1991, *Alaska Outer Continental Shelf Chukchi Sea Oil & Gas Lease Sale 126, Final Environmental Impact Statement*, OCS EIS/EA MMS 90-0095, Minerals Management Service, Alaska OCS Region, Anchorage, Alaska, Jan.

MMS, 1992, *Geologic Report for the Gulf of Alaska Planning Area*, Report 92-0065, R.F. Turner (ed.), U.S. Department of the Interior, Alaska Outer Continental Shelf Region.

MMS, 1995a, *Cook Inlet Planning Area Oil and Gas Lease Sale 149*, Vol. 1, Report 95-0066, U.S. Department of the Interior, Alaska Outer Continental Shelf Region.

MMS, 1995b, *Gulf of Mexico Air Quality Study, Final Report, Volume I: Summary of Data Analysis and Modeling*, OCS Study MMS 95-0038, MMS, Gulf of Mexico OCS Region, New Orleans, La., Aug.

MMS, 1996, *Beaufort Sea Planning Area Oil and Gas Lease Sale 144, Final Environmental Impact Statement*, OCS EIS/EA MMS 96-0012, USDOI/MMS, Alaska OCS Region, Anchorage, Alaska.

MMS, 1996a, *Cook Inlet Planning Area Oil and Gas Lease Sale 149, Final Environmental Impact Statement*, OCS EIS/EA MMS 95-0066, Alaska Outer Continental Shelf Region, Anchorage, Alaska, Jan.

MMS, 1996b, *Outer Continental Shelf Oil & Gas Leasing Program: 1997-2002, Final Environmental Impact Statement*, OCS EIS/EA, MMS 96-0043, MMS, Environmental Projects Coordination Branch, Herndon, Va.

MMS, 1997a, *Beaufort Sea Planning Area Oil and Gas Lease Sale 170, Draft Environmental Impact Statement*, OCS EIS/EA MMS 97-0011, MMS, Alaska OCS Region, Anchorage, Alaska, May.

MMS, 1997b, *Gulf of Mexico OCS Oil and Gas Lease Sales 169, 172, 175, 178, and 182, Central Planning Area, Final Environmental Impact Statement*, OCS EIS/EA 97-0033, MMS, Gulf of Mexico OCS Region, New Orleans, La., Nov.

MMS, 1998, *Beaufort Sea Planning Area, Oil and Gas Lease Sale 170, Final Environmental Impact Statement*, OCS EIS/EA, MMS 98-0002, Minerals Management Service, Alaska Outer Continental Shelf Region, Anchorage, Alaska.

MMS, 2001a, *Sediment Quality in Depositional Areas of Shelikof Strait and Outermost Cook Inlet*, OCS Study MMS 2000-024, Alaska Outer Continental Shelf Region, Anchorage, Alaska.

MMS, 2001b, *Brief Overview of Gulf of Mexico OCS Oil and Gas Pipelines: Installation, Potential Impacts, and Mitigation Measures*, OCS Report, MMS 2001-067, Gulf of Mexico OCS Region, New Orleans, La.

MMS, 2001c, *Gulf of Mexico OCS Oil and Gas Lease Sale 181, Eastern Planning Area, Final Environmental Impact Statement*, OCS EIS/EA MMS 2001-051, MMS, Gulf of Mexico OCS Region, New Orleans, La, June.

MMS, 2001d, *Programmatic Environmental Assessment for Grid 10 Site-Specific Evaluation of BP Exploration and Production Inc.'s Joint Initial Development Operations Coordination Document*, N-7216 Holstein Project Green Canyon Blocks 644 and 645. Available at http://scholar.google.com/scholar?hl=en&lr=&q=cache: ai_wARiqbbYJ:mms.gov/homepg/regulate/environ/nepa/grid10ea.pdf+link:IuAQ9j0cEg4J:scholar.google.com/#25. Accessed Oct. 2005.

MMS, 2002a, *Outer Continental Shelf Oil & Gas Leasing Program: 2002-2007, Final Environmental Impact Statement*, OCS EIS/EA MMS 2002-006, Minerals Management Service, Herndon, Va., April. 2 vols.

MMS, 2002b, *Oil Spill Risk Analysis: Cook Inlet Planning Area, OCS Lease Sales 191 and 199*, OCS Report MMS 2002-074, MMS, Environmental Division, Herndon, Va.

MMS, 2002c, *Liberty Development and Production Plan, Final Environmental Impact Statement*, OCS Report 2002-019, Minerals Management Service, Alaska OCS Region, Anchorage, Alaska, May.

MMS, 2002d, *Environmental Sensitivity Index Shoreline Classification of the Alaskan Beaufort Sea and Chukchi Sea*, OCS Study MMS 2003-006, prepared for MMS, Alaska OCS Region, by Research Planning, Inc.

MMS, 2003a, *Alaska Outer Continental Shelf, Cook Inlet Planning Area, Oil and Gas Lease Sales 191 and 199, Final Environmental Impact Statement*, OCS EIS/EA MMS 2003-055, Minerals Management Service, Alaska OCS Region, Anchorage.

MMS, 2003b, *Vessel Strike Avoidance and Injured/Dead Protected Species Reporting: Notice to Lessees and Operators of Federal Oil, Gas, and Sulphur Leases in the Outer Continental Shelf, Gulf of Mexico OCS Region*. June 19. Available at http://www.ocsbbs.com/ntls/ntl04-g01.asp. Accessed April 15, 2011.

MMS 2003c, *Official Trnscript – Public Hearing Homer, Minerals Management Office, January 23, 2003, Draft Environmental Impact Statement for Cook Inlet Planning Area Oil and Gas Lease Sales 191 and 199*, transcribed by S. Hile, Computer Matrix Court Reporters, LLC, Anchorage, Alaska.

MMS, 2003d, *Final Environmental Impact Statement for Lease Sales 189 and 197*, Volumes I & II, OCS Study OCS EIS/EA MMS 2003-020, Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La.

MMS, 2003e, *Alaska Outer Continental Shelf Beaufort Sea Planning Area Oil and Gas Lease Sales 186, 195, and 202 Final Environmental Impact Statement*, OCS EIS/EA MMS 2003-001, Minerals Management Service, Alaska OCS Region, Anchorage, Alaska, Feb.

MMS, 2004a, *Geological and Geophysical Exploration for Mineral Resources on the Gulf of Mexico Outer Continental Shelf, Final Programmatic Environmental Assessment*, OCS EIS/EA MMS 2004-054, Gulf of Mexico Outer Continental Shelf Region, New Orleans, La.

MMS, 2004b, *Implementation of Seismic Survey Mitigation Measures and Protected Species Observer Program: Notice to Lessees and Operators of Federal Oil, Gas, and Sulphur Leases in the Outer Continental Shelf, Gulf of Mexico OCS Region*, March 1. Available at http://www.ocsbbs.com/ntls/ntl04-g01.asp. Accessed April 15, 2011.

MMS, 2004c, *Environmental Assessment Proposed Oil and Gas Lease Sale 195 Beaufort Sea Planning Area*, OCS EIS/EA MMS 2004-028, Minerals Management Service, Alaska OCS Region, Anchorage, Alaska, July.

MMS, 2005a, "A Hurricane on the OCS: Planning for Worst," *MMS Ocean Science* 2(6):4.

MMS, 2005b, "Powerful New Lessons: Hurricanes on the OCS," *MMS Ocean Science* 2(6):10–11.

MMS, 2005c, "Taking Another Look: Ivan the Terrible," *MMS Ocean Science* 2(6):6.

MMS, 2005d, *Programmatic Environmental Assessment: Structure-Removal Operations on the Gulf of Mexico Outer Continental Shelf*, OCS EIS/EA 2005-013, Gulf of Mexico OCS Region, New Orleans, La.

MMS, 2005e, *Proposed Geophysical Survey, Cosmopolitan Unit, Cook Inlet. Environmental Assessment*, OCS EIS/EA, MMS 2005-045. U.S. Department of the Interior, Minerals Management Service, Alaska OCS Region.

MMS, 2006a, *Gulf of Mexico OCS Oil and Gas Lease Sales: 2007-2012, Western Planning Area Sales 204, 207, 210, 215, and 218 and Central Planning Area Sales 205, 206, 208, 213, 216, and 222, Draft Environmental Impact Statement*, MMS 2006-062, Minerals Management Service Gulf of Mexico OCS Region, Nov. Available at http://www.gomr.boemre.gov/PDFs/2006/2006-062-Vol1.pdf. Accessed April 22, 2011.

MMS, 2006b, *Outer Continental Shelf Oil and Gas Leasing Program: 2007-2012, Draft Environmental Impact Statement*, July.

MMS, 2006c, *Programmatic Environmental Assessment on Arctic Ocean Outer Continental Shelf Seismic Surveys – 2006*, OCS EIS/EA MMS 2006-019, MMS, Alaska OCS Region, Anchorage, Alaska.

MMS, 2007a, *Alaska Outer Continental Shelf Chukchi Sea Planning Area, Oil and Gas Lease Sale Area 193 and Seismic Surveying Activities in the Chukchi Sea Final Environmental Impact Statement*, OCS EIS/EA MMS 2007-026, Minerals Management Service, Alaska OCS Region, Anchorage, Alaska.

MMS, 2007b, *Gulf of Mexico OCS Oil and Gas Lease Sales: 2007-2012 Final Environmental Impact Statement*, OCS EIS/EA MMS 2007-018, Minerals Management Service, Gulf of Mexico OCS Region, New Orleans.

MMS, 2007c, *Outer Continental Shelf Oil and Gas Leasing Program: 2007-2012, Final Environmental Impact Statement*, Volume I, OCS EIS/EA, MMS 2007-003, April.

MMS, 2007d, *Programmatic Environmental Impact Statement for Alternative Energy Development and Production and Alternate Use of Facilities on the Outer Continental Shelf (Final*), OCS EIS/EA MMS 2007-046, Oct.

MMS, 2007e, *Outer Continental Shelf Oil and Gas Leasing Program: 2007-2012, Final Environmental Impact Statement*, Vol. II, OCS EIS/EA, MMS 2007-003, April.

MMS, 2008a, *Gulf of Mexico OCS Oil and Gas Lease Sales: 2009-2012, Central Planning Area Sales 208, 213, 216, and 222, Western Planning Area Sales 210, 215, and 218, Final Supplemental Environmental Impact Statement*, OCS EIS/EA, MMS 2008-41, Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La., Sept. Available at http://www.gomr.boemre.gov/PDFs/2008/2008-041.pdf. Accessed April 22, 2011.

MMS, 2008b, *Alaska Outer Continental Shelf Beaufort Sea and Chukchi Planning Areas Oil and Gas Lease Sales 209, 212, 217, and 221, Draft Environmental Impact Statement*, OCS EIS/EA MMS 2008-055, Minerals Management Service, Alaska OCS Region, Nov.

MMS, 2008c, *Design Options for Offshore Pipelines in the U.S. Beaufort and Chukchi Seas*, Report R-07-078-519, April.

MMS, 2009a, *Possible Effects of OCS Gas and Oil Activities on the California Gray Whale*, Minerals Management Service, Pacific OCS Region.

MMS, 2009b, *Arctic Oil Spill Response Research and Development Program – A Decade of Achievement*.

MMS, 2010, *Chukchi Sea Planning Area – Oil and Gas Lease Sale 193 in the Chukchi Sea, Alaska, Draft Supplemental Environmental Impact Statement*, OCS EIS/EA BOEMRE 2010-034, Alaska OCS Region Office of Leasing and Environment.

Mitchell, D.A., W.J. Teague, E. Jarosz, and D.W. Wang, 2005, "Observed Currents over the Outer Continental Shelf during Hurricane Ivan," *Geophysical Research Letters* 32:L11610.

Mobley, C.M., J.C. Haggarty, C.J. Utermohle, M. Eldridge, R.E. Reanier, A. Crowell, B.A. Ream, D.R. Yesner, J.M. Erlandson, and P.E. Buck, 1990, *The 1989* Exxon Valdez *Cultural Resource Program*, Exxon Shipping Company and Exxon Company, USA (a Division of Exxon Corporation), Anchorage, Alaska.

Moein, S.E., J.A. Musick, J.A. Keinath, D.E. Barnard, M.L. Lenhardt, and R. George, 1995, "Evaluation of Seismic Sources for Repelling Sea Turtles from Hopper Dredges," pp. 90–93 in *Sea Turtle Research Program: Summary Report*, L.Z. Hales (comp.), Technical Report CERC-95, prepared for U.S. Army Engineer Division, South Atlantic, Atlanta, Ga., and U.S. Naval Submarine Base, Kings Bay, Ga.

Moles, A., and B.L. Norcross, 1998, "Effects of Oil-Laden Sediments on Growth and Health of Juvenile Flatfishes," *Canadian Journal of Fisheries and Aquatic Sciences* 55:605–610.

Molnia, B.F., et al., 1979, "Gas-Charged Sediment Areas in the Northern Gulf of Alaska," in *Geological Survey Research 1979*, U.S. Geological Survey Professional Paper 1150.

Montagna, P.A., and P.E. Harper, Jr., 1996, "Benthic Infaunal Longterm Response to Offshore Production Platforms in the Gulf of Mexico," *Can. J. Fish. Aquat. Sci.* 53:2567–2588.

Morison, J., K. Aagaard, and M. Steele, 2000, "Recent Environmental Changes in the Arctic: A Review," *Arctic* 53(4):359–371.

Morreale, S.J., and E.A. Standora, 1998, *Early Life Stage Ecology of Sea Turtles in Northeastern U.S. Waters*, NOAA Technical Memorandum NMFS-SEFSC-413.

Morreale, S.J., E.A. Standora, J.R. Spotila, and F.V. Paladino, 1996, "Migration Corridor for Sea Turtles," *Nature* 384:319–320.

Motavalli, J., 2010, Cellulosic Ethanol's Time May Finally Have Come. BNET. Available at http://www.bnet.com/blog/electric-cars/cellulosic-ethanol-8217s-time-may-finally-have-come/1475. Accessed August 20, 2011.

Moulton, V.D., W.J. Richardson, and M.T. Williams, 2003, "Ringed Seal Densities and Noise near an Icebound Artificial Island with Construction and Drilling," *Acoustics Research Letters Online* 4(4):112–117.

Mrosovksy, N., 1972, "Spectrographs of the Sounds of Leatherback Turtles," *Herpetologica* 28:256–258.

Muench, R., and J. Schumacher, 1980, *Physical Oceanographic and Meteorologic Conditions in the Northwest Gulf of Alaska*, NOAA Technical Memorandum ERL PMEL-22 USDOC/NOAA, PMEL, NOAA (National Oceanic and Atmospheric Administration), Seattle, Wash.

Mulherin, N.D., W.B. Tucker III, O. Smith, and W. Lee, 2001, *Marine Ice Atlas for Cook Inlet, Alaska*, ERDC/CRREL Technical Report 01-10, USACE, CRREL (Cold Regions Research and Engineering Laboratory), Hanover, N.H.

Municipality of Anchorage, 2011, *Port of Anchorage*. Available at http://www.muni.org/departments/port/pages/default.aspx. Accessed on July 18, 2011.

Muller-Karger, F.E., F. Vukovich, R. Leben, B. Nababan, C. Hu, and D. Myhre, 2001, *Surface Circulation and the Transport of the Loop Current into the Northeastern Gulf of Mexico*, OCS Study, MMS 2001-102, MMS, Gulf of Mexico OCS Region, New Orleans, La.

Murphy, S.M., R.H. Day, J.A. Wiens, and K.R. Parker, 1997, "Effects of the *Exxon Valdez* Oil Spill on Birds: Comparison of Pre- and Post-Spill Surveys in Prince William Sound, Alaska," *The Condor* 99: 299–313.

Murton, J.B., 2008 "Global Warming and Thermokarst," in *Soil Biology: Permafrost Soils*, R. Margesin (ed.), Springer, 185–204.

Nakatani, R.E., and A.E. Nevissi, 1991, "Effect of Prudhoe Bay Crude Oil on the Homing of Coho Salmon in Marine Waters," *North American Journal of Fisheries Management* 11:160–166.

National Academy of Sciences, 1983, *Drilling Discharges in the Marine Environment*, Coastal Zone Information Center. Available at http://www.gpo.gov/fdsys/pkg/CZIC-td195-p4-n36-1983/html/CZIC-td195-p4-n36-1983.htm. Accessed July 11, 2011.

National Climatic Data Center (NCDC). 2011. *2010 Local Climatological Data, Annual Summary with Comparative Data, Barrow, Alaska (PABR)*. National Oceanic and Atmospheric Administration. Available at http://www7.ncdc.noaa.gov/IPS/lcd/lcd.html. Accessed May 27, 2011.

National Commission (National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling), 2011, *Deep Water, The Gulf Oil Disaster and the Future of Offshore Drilling, Report to the President*, Jan.

National Science Foundation and USGS (U.S. Geological Survey), 2010, *Draft Programmatic Environmental Impact Statement/Overseas Environmental Impact Statement for Marine Seismic Research Funded by the National Science Foundation or Conducted by the U.S. Geological Survey*, Oct. Available at http://www.nsf.gov/geo/oce/envcomp/peis_marine_seismic_research/nsf-usgs_draft_prog_eis-oies_oct_2010.pdf. Accessed June 24, 2011.

N.C. Solar Center and Interstate Renewable Energy Council, undated, *Database of State Incentives for Renewables & Efficiency*. Available at http://www.dsireusa.org/. Accessed August 21, 2011.

NCDC (National Climatic Data Center), 2011a, *2010 Local Climatological Data, Annual Summary with Comparative Data, Kodiak, Alaska (PADQ)*, National Oceanic and Atmospheric Administration. Available at http://www7.ncdc.noaa.gov/IPS/lcd/lcd.html. Accessed May 27, 2011.

Neal, C.A., T.L. Murray, J.A. Power, J.N. Adleman, P.M. Whitmore, and J.M. Osiensky, 2011, "Hazard Information Management, Interagency Coordination, and Impacts of the 2005–2006 Eruption of Augustine Volcano," Chapter 28 in *The 2006 Eruption of Augustine Volcano, Alaska*, J.A. Powers et al. (eds.), U.S. Geological Survey Professional Paper 1769.

Neff, J.M., N.N. Rabalais, and D.F. Boesch, 1987, "Offshore Oil and Gas Development Activities Potentially Causing Long-Term Environmental Effects," pp. 149–174 in *Long Term Effects of Offshore Oil and Gas Development*, D.F. Boesch and N.N. Rabalais, (eds.), Elsevier Applied Science Publishers, London.

Neff, J.M., 1997a, "Metals and Organic Chemicals Associated with Oil and Gas Well Produced Water: Bioaccumulation, Fates, and Effects in the Marine Environment," in *Gulf of Mexico Produced Water Bioaccumulation Study*, report prepared by Continental Shelf Associates, Inc., Jupiter, Fla., for the Offshore Operators Committee.

Neff, J.M., 1997b, "Ecotoxicology of Arsenic in the Marine Environment," *Environmental Toxicology and Chemistry* 16:917–927.

Neff, J.M., 2002, *Bioaccumulation in Marine Organisms, Effects of Contaminants from Oil Well Produced Water*, Elsevier Science Ltd., United Kingdom.

Neff, J.M., 2005, *Composition, Environmental Fates, and Biological Effects of Water-Based Drilling Muds and Cuttings Discharged to the Marine Environment: A Synthesis and Annotated Bibliography*, prepared for Petroleum Environmental Research Forum (PERF) and American Petroleum Institute.

Neff, J.M., and W.A. Stubblefield, 1995, "Chemical and Toxicological Evaluation of Water Quality Following the Exxon Valdez Oil Spill," in *Exxon Valdez Oil Spill: Fate and Effects in Alaskan Waters*, P.G. Wells, J.M. Butler, and J.S. Hughes (eds.), ASTM STP 1219, American Society for Testing and Materials, Philadelphia, Pa.

Neff & Associates, 2010, *Continuation of the Arctic Nearshore Impact Monitoring in the Development Area (cANIMIDA): Synthesis, 1999–2007: Final Report*, prepared for Bureau of Ocean Energy Management, Regulation and Enforcement, Alaska Outer Continental Shelf Region, Anchorage, Alaska.

Neff, J.M., S. McKelvie, and R.C. Ayers, 2000, *Environmental Impacts of Synthetic Based Drilling Fluids*, OCS Study MMS 2000-064, prepared by Robert C. Ayers and Associates, Inc., for Minerals Management Service, Gulf of Mexico Outer Continental Shelf Region, New Orleans, La., August.

Neff, J.M., A.D. Hart, J.P. Ray, J.M. Limia, and T.W. Purcell, 2005, *An Assessment of Seabed Impacts of Synthetic-Based Drilling-Mud Cuttings in the Gulf of Mexico*, SPE 94086, paper presented at the 2005 SPE/EPA/DOE Exploration and Production Environmental Conference, Galveston, Texas, March 7–9.

Nelson, R.H., 1991, "Salt Tectonics and Listric-Normal Faulting," in *The Gulf of Mexico Basin*, A. Salvador (ed.), Geological Society of America, *The Geology of North America* Vol. J, pp. 73–89.

Neurauter T.W., and W.R. Bryant, 1990, "Seismic Expression of Sedimentary Volcanism on the Continental Slope, Northern Gulf of Mexico," *Geo-Marine Letters* 10:225–231.

Nicholls, R.J., P.P. Wong, V.R. Burkett, J.O. Codignotto, J.E. Hay, R.F. McLean, S. Ragoonaden, and C.D. Woodroffe, 2007, "Coastal Systems and Low-Lying Areas," pp. 315–356 in *Climate Change 2007: Impacts, Adaptation and Vulnerability, Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*, M.L. Parry, O.F. Canziani, J.P. Palutikof, P.J. van der Linden, and C.E. Hanson (eds.), Cambridge University Press, Cambridge, U.K.

Nieukirk, S.L., K.M. Stafford, D.K. Mellinger, R.P. Dziak, and C.G. Fox, 2004, "Low Frequency Whale and Seismic Airgun Sounds Recorded in the Mid-Atlantic Ocean," *Journal of the Acoustical Society of America* 115(4):1832–1843.

Nighswander, T.S., and N. Peacock, 1999, "The Communication of Health Risk from Subsistence Food in a Cross Cultural Setting: Lessons Learned from the Exxon Valdez Oil Spill," in *Evaluating and Communicating Subsistence Seafood Safety in a Cross-Cultural Context*, L.J. Field, J.A. Fall, T.S. Nighswander, N. Peacock, and U. Varanasi (eds.), SETAC Press, Pensacola, Fla.

Nightingale, B., and C.A. Simenstad, 2001, *White Paper: Dredging Activities: Marine Issues (Executive Summary)*, Research Project T1803, Task 35, University of Washington, prepared for the Washington State Transportation Commission in cooperation with the U.S. Department of Transportation, July.

Nikolopoulos, A., R.S. Pickart, P.S. Fratantoni, K. Shimada, D.J. Torres, and and E.P. Jones, 2009, "The Western Arctic Boundary Current at 152°W: Structure, Variability, and Transport," *Deep Sea Rersearch II* 56:1164–1181.

Niven, K., and R. McLeod, 2009, "Offshore Industry: Management of Health Hazards in the Upstream Petroleum Industry," *Occupational Medicine* 59 (5):304–309.

NMFS (National Marine Fisheries Service), 1988, *Consultation for Removal of Certain Outer Continental Shelf Oil and Gas Structures in the Gulf of Mexico. Biological Opinion*. National Marine Fisheries Service, U.S. Department of Commerce, National Oceanic and Atmospheric Administration, Washington, D.C. Issued July 25, 1988.

NMFS, 2001, *Endangered Species Act – Section 7 Consultation Biological Opinion on the Construction and Operation of the Liberty Oil Production Island*, Alaska Regional Office, Office of Protected Resources, Anchorage, Alaska.

NMFS, 2005, *Recovery Plan for the North Atlantic Right Whale (Eubalaena glacialis)*, National Marine Fisheries Service, Silver Spring, Md.

NMFS, 2006, *National Marine Fisheries Service's Biological Opinion for Federal Oil and Gas Leasing and Exploration by the Minerals Management Service within the Alaskan Beaufort and Chukchi Seas*, National Marine Fisheries Service Juneau, Alaska, June 16.

NMFS, 2008a, "Endangered and Threatened Species; Endangered Status for the Cook Inlet Beluga Whale," *Federal Register* 73(205):62919–62930.

NMFS, 2008b, "Taking of the Cook Inlet, Alaska Beluga Whale Stock by Alaska Natives," *Federal Register* 73(200):60976–60986.

NMFS, 2008c, *Conservation Plan for the Cook Inlet Beluga Whale (Delphinapterus leucas)*, National Marine Fisheries Service, Juneau, Alaska, October. Available at http://www.fakr.noaa.gov/protectedresources/whales/beluga/mmpa/final/cp2008.pdf. Accessed on March 17, 2011.

NMFS, 2011a, *Dolphins and Whales and the Gulf of Mexico Oil Spill*, National Marine Fisheries Service, Office of Protected Resources, Silver Spring, Md. Available at http://www.nmfs.noaa.gov/pr/health/oilspill/mammals.htm. Accessed July 1, 2011.

NMFS, 2011b, *Marine Mammals Unusual Mortality Events*, National Marine Fisheries Service, Office of Protected Resources, Silver Spring, Md. Available at http://www.nmfs.noaa.gov/pr/health/mmume. Accessed September 7, 2011.

NMFS and USFWS (National Marine Fisheries Service and the U.S. Fish and Wildlife Service), 2008, *Recovery Plan for the Northwest Atlantic Population of the Loggerhead Sea Turtle (*Caretta caretta*)*, Second Revision, December 8.

NOAA (National Oceanic and Atmospheric Administration), 1994, *Shoreline Countermeasures Manual, Alaska*, NOAA Hazardous Materials Response and Assessment Division.

NOAA, 1995, *Gulf of Mexico Land-Based Pollution Sources Inventory — Point Sources and Non-Point Sources of Pollution*.

NOAA, 1997, *Integrating Physical and Biological Studies of Recovery from the* Exxon Valdez *Oil Spill, Case Studies of Four Sites in Prince Wiliam Sound, 1989-1994*, NOAA Technical Memorandum NOS ORCA 114.

NOAA, 1998, *Oil Spill Impacts and the Biological Basis for Response Guidance: An Applied Synthesis of Research on Three Subarctic Intertidal Communities*, Technical Memorandum NOS ORCA 125.

NOAA, 2000, *Characteristic Coastal Habitats, Choosing Spill Response Alternatives*, National Ocean Service, Office of Response and Restoration, Hazardous Materials Response Division.

NOAA, 2002, *Trajectory Analysis Handbook*, technical report, NOAA Ocean Service, Office of Response and Restoration, Hazardous Materials Response Division, Seattle, Wash.

NOAA, 2003, *Oil and Sea Turtles*, G. Shigenaka (ed.), NOAA National Ocean Service, Office of Response and Restoration, Washington, D.C.

NOAA, 2005, *Trajectory Analysis Handbook*, Office of Response and Restoration, Hazardous Materials Response Division, Seattle, Wash. Available at http://response.restoration.noaa.gov/. Accessed February 2005. (will need to update the above with data from DWH)

NOAA, 2010a, *Sea Turtle Strandings and the Deepwater Oil Spill*. Available at http://www.noaa.gov/factsheets/new%20version/sea_turtles.pdf. Accessed April 15, 2011.

NOAA, 2010b, *Deepwater BP Oil Spill, Natural Resource Damage Assessment (NRDA), NRDA By the Numbers – November 1, 2010*. Available at http://www.gulfspillrestoration.noaa.gov/wp-content/uploads/2010/11/FINAL-NRDA_by_the_Numbers_11.03.pdf.pdf. Accessed November 10, 2010.

NOAA, 2010c, *Sea Turtles, Dolphins, and Whales and the Gulf of Mexico Oil Spill. Turtles Documented by Species*. Available at http://www.nmfs.noaa.gov/pr/health/oilspill/turtles.htm. Accessed November 23, 2010.

NOAA, 2010d, "Intent to Prepare a Supplemental Environmental Impact Statement on the *Exxon Valdez* Oil Spill Trustee Council's Restoration Efforts," *Federal Register* 75:3706–3709.

NOAA, 2010e, *NOAA's Oil Spill Response Effects of Oil on Marine Mammals and Sea Turtles*. Available at http://www.noaa.gov/factsheets/new%20version/marinemammals_seaturtles.pdf. Accessed January 24, 2011.

NOAA, 2011a, *Ice Breakup Reconnaissance in Alaska*, National Weather Service, Alaska-Pacific River Forecast Center. Available at http://aprfc.arh.noaa.gov/resources/docs/brkup.php. Accessed June 2, 2011.

NOAA, 2011b, *Storm Surge Overview*, National Weather Service, National Hurricane Center. Available at http://www.nhc.noaa.gov/ssurge/ssurge_overview.shtml. Accessed May 18, 2011.

NOAA, 2011c, *The Gulf Region's Contribution to U.S. Energy Production*. Available at http://stateofthecoast.noaa.gov/energy/gulfenergy.html. Accessed July 18, 2011.

NOAA, 2011d, *Responding to Oil Spills – In Situ Burning – Questions about Environmental Impacts – What Are the Potential Ecological Effects of In-Situ Burning (ISB)*, NOAA Office of Response and Restoration website. Available at http://response.restoration.noaa.gov. Accessed September 7, 2011.

Nodine, M.C., et al., 2006, *Mudslides during Hurricane Ivan and an Assessment of the Potential for Future Mudslides in the Gulf of Mexico*, Offshore Technology Research Center, Texas A&M University, College Station, Texas.

Northern Economics, 1993, *Commercial Fishing Industry of the Gulf of Alaska*, Technical Report No. 159, prepared for the MMS, Alaska OCS Office, Alaska OCS Socioeconomic Studies Program, Anchorage, Alaska.

Nomack, M., 2010, "Effects of Oil on Wildlife and Habitat," in *The Encyclopedia of Earth*, C.J. Cleveland (topic ed.), Environmental Information Coalition, National Council for Science and the Environment, Washington, D.C. Available at http://www.eoearth.org/articles/view/158446/?topic=50359. Accessed March 15, 2011.

Nova Institute, 2009, *Bioplastics Market Worldwide 2007-2025*. Available at http://innovation-bioplastique.com/2009/02/13/bioplastics-market-worldwide-2007-2025/. Accessed August 2011.

Novozymes Bioenergy, 2011, *The POET/Novozymes Collaboration*. Available at http://www.bioenergy.novozymes.com/cellulosic-ethanol/partner-case-studies/poet/the-poet-novozymes-collaboration/. Accessed August 20, 2011.

Nowacek, S.M., and R.S Wells, 2001, "Short-Term Effects of Boat Traffic on Bottlenose Dolphins, *Tursiops truncatus*, in Sarasota Bay, Florida," *Marine Mammal Science* 17:673–688.

Nowacek, S.M., R.S. Wells, E.C.G. Owen, T.R. Speakman, R.O. Flamm, and D.P. Nowacek, 2004, "Florida Manatees, *Trichechus manatus latirostris*, Respond to Approaching Vessels," *Biological Conservation* 119:517–523.

Nowlin, W.D. Jr., A.E. Jochens, R.O. Reid, and S.F. DiMarco, 1998, *Texas-Louisiana Shelf Circulation and Transport Processes Study: Synthesis Report, Volume I: Technical Report*, OCS Study MMS 98-0035, MMS, Gulf of Mexico OCS Region, New Orleans, La.

Nowlin, W.D., Jr., A.F. Jochens, S.F. DiMarco, and R.O. Reid, 2000, "Chapter 4: Physical Oceanography, in *Deepwater Gulf of Mexico Environmental and Socioeconomic Data Search and Literature Synthesis, Volume I: Narrative Report*, Continental Shelf Associates (eds.), OCS Study MMS 2000-049, MMS, Gulf of Mexico OCS Region, New Orleans, La.

NRC (National Research Council), 1983, *Drilling Discharges in the Marine Environment. Panel on Assessment of Fates and Effects of Drilling Fluids and Cuttings in the Marine Environment*. Marine Board, Commission on Engineering and Technical Systems, National Research Council, National Academy Press, Washington, D.C.

NRC, 1990, *Decline of Sea Turtles: Causes and Prevention*, National Academy Press, Washington, D.C.

NRC, 1992, *Rethinking the Ozone Problem in Urban and Regional Air Pollution*, National Academy Press, Washington, D.C.

NRC, 2003a, *Cumulative Environmental Effects of Oil and Gas Activities on Alaska's North Slope*, National Academies Press, Washington, D.C.

NRC, 2003b, *Oil in the Sea III: Inputs, Fates, and Effects*, Committee on Oil in the Sea: Inputs, Fates, and Effects, Ocean Studies Board and Marine Board, Divisions of Earth and Life Studies and Transportation Research Board, National Research Council, National Academies Press, Washington, D.C.

NRC, 2003c, *Ocean Noise and Marine Mammals*, National Academies Press, Washington, D.C.

NRC, 2005a, *Marine Mammal Populations and Ocean Noise: Determining When Noise Causes Biologically Significant Effects*, National Academies Press, Washington, D.C.

NRC, 2005b, *Oil Spill Dispersants – Efficacy and Effects*, National Academies Press, Washington, D.C.

NRC, 2010, *Transitions to Alternative Transportation Technologies—Plug-in Hybrid Electric Vehicles*. Available at http://www.nap.edu/catalog.php?record_id=12826. Accessed August 20, 2011.

NREL (National Renewable Energy Laboratory), 2007, *Validation of Hydrogen Fuel Cell Vehicle and Infrastructure Technology*, October. Available at http://www.afdc.energy.gov/afdc/pdfs/42284.pdf. Accessed August 20, 2011.

NREL, 2010, *Large-Scale Offshore Wind in the United States: Assessment of Opportunities and Barriers*, National Renewable Energy Laboratory, Golden, Colo. Available at http://www.nrel.gov/wind/pdfs/40745.pdf. Accessed September 12, 2011.

NSF and USFGS (National Science Foundation and U.S. Geological Survey), 2010, *Draft Programmatic EIS for Marine Seismic Research Funded by the National Science Foundation or Conducted by the U.S. Geological Survey*, draft, October.

Nugues, M.M., and C.M. Roberts, 2003, "Partial Mortality in Massive Reef Corals as an Indicator of Sediment Stress on Coral Reefs," *Marine Pollution Bulletin* 46:314–323.

Nuka Research and Planning Group, 2007, *Oil Spill Response Challenges in Arctic Waters*, report commissioned and published by WWF International Arctic Programme, Oslo, Norway, Oct. Available at http://wwf.panda.org/what_we_do/where_we_work/arctic/publications/?122240/Oil_Spill_Response_Challenges_in_Arctic_waters. Accessed July 11, 2011.

Nuka Research and Planning Group, LLC and Pearson Consulting, LLC, 2010, *Oil Spill Prevention and Response in the U.S. Arctic Ocean: Unexamined Risks, Unacceptable Consequences*, Commissioned by U.S. Arctic Program, Pew Environment Group.

Oey, L.Y., 2008, "Loop Current and Deep Eddies," *Journal of Physical Oceanography* 38(7):1426–1449.

Oey, L.Y., P. Hamilton, and H.C. Lee, 2004, *Modeling and Data Analyses of Circulation Processes in the Gulf of Mexico*, OCS Study, MMS 2003-074, MMS, Gulf of Mexico OCS Region, New Orleans, La.

Oey, L.Y., T. Ezer, and H.C. Lee, 2005, "Loop Current, Rings and Related Circulation in the Gulf of Mexico: A Review of Numerical Models and Future Challenges," in *Circulation in the Gulf of Mexico: Observations and Models*, Volume 161 of Geophysical Monograph Series, W. Sturges and A. Lugo-Fernandez (eds.), American Geophysical Union, Washington, D.C.

Oey, L.-Y., T. Ezer, C. Hu, and F.E. Muller-Karger, 2007, "Baroclinic Tidal Flows and Inundation Processes in Cook Inlet, Alaska: Numerical Modeling and Satellite Observations" *Ocean Dynamics* 57(3):205–221.

O'Hara, J., and J.R. Wilcox, 1990, "Avoidance Responses of Loggerhead Turtles, *Caretta caretta*, to Low Frequency Sound," *Copeia* 1990(2):564–567.

Ohnsman, A., 2010, "Toyota Targets $50,000 Price for First Hydrogen Car," *Bloomberg Businessweek*, May 6, 2010.

Okkonen, S., S. Pegau, and S. Saupe, 2009, *Seasonality of Boundary Conditions for Cook Inlet*, OCS study, MMS 2009-041, Alaska Coastal Marine Institute, University of Alaska.

Okkonen, S.R., C.J. Ashjian, R.G. Campbell, W. Maslowski, J.L. Clement-Kinney, and R. Potter, 2009, "Intrusion of Warm Bering/Chukchi Waters onto the Shelf in the Western Beaufort Sea," *Journal of Geophysical Research* 114:C00A11.

Online Code Environment & Advocacy Network, undated, *Code Status*. Available at http://www.bcap-energy.org/node/5. Accessed August 20, 2011.

OSAT (Operational Science and Advisory Team of the Unified Area Command), 2010, *Summary Report for Sub-Sea and Sub-Surface Oil and Dispersant Detection: Sampling and Monitoring*, Dec. 17.

OSAT, 2011, *Summary Report for Fate and Effects of Remnant Oil in the Beach Environment*, prepared for L.D. Stroh, Capt., U.S. Coast Guard, Federal On-Scene Coordinator, Deepwater Horizon MC252, Feb. 10. Available at http://www.restorethegulf.gov/sites/default/files/u316/OSAT-2%20Report%20no%20ltr.pdf. Accessed March 17, 2011.

OSAT-2 (Operational Science and Advisory Team-2 of the Unified Area Command), 2011, *Summary Report for Fate and Effects of Remnant Oil in the Beach Environment*, Gulf Coast Incident Management Team, Feb. 10.

Osborn, S.G., A. Vengosh, N.R. Warner, and R.B. Jackson, 2011, "Methane Contamination of Drinking Water Accompanying Gas-Well Drilling and Hydraulic Fracturing," *PNAS*, Vol. 108, No. 20, May.

Ostermeier, R.M., et al., 2002, "Dealing with Shallow-Water Flow in the Deepwater Gulf of Mexico," *The Leading Edge* 21(7):660–668.

Owens, E., and J. Michel. 2003, "Environmental Sensitivity Index (ESI) Classification for the Beaufort Sea and Chukchi Sea Coasts, Alaska OCS Region," in *Ninth Information Transfer Meeting and Barrow Information Update Meeting, Final Proceedings, March 10, 11, and 12, 2003, Anchorage, Alaska; March 14, 2003, Barrow, Alaska*, OCS Study MMS 2003-042, MMS, Alaska OCS Region.

Page, H.M., J.E. Dugan, C.S. Culver, and J.C. Hoestery, 2006, "Exotic Invertebrate Species on Offshore Oil and Gas Platforms," *Marine Ecology Progress Series* 325:101–107.

Palinkas, L., J. Russell, M. Downs, and J. Petterson, 1992, "Ethnic Differences in Stress, Coping, and Depressive Symptoms after the *Exxon Valdez* Oil Spill," *J. Nerv. Mental Disease* 180:287–295.

Pamplin, W.L., 1979, *Construction-Related Impacts of the Trans-Alaska Pipeline System on Terrestrial Wildlife Habitats*, Special Report Number 24, Joint State/Federal Fish and Wildlife Advisory Team.

Parfomak, P.W., and A. Vann, 2009, *Liquefied Natural Gas (LNG) Import Terminals: Siting, Safety, and Regulation*, Congressional Research Service 7-5700, Dec. 14.

Parkinson, C., D. Cavalieri, P. Gloersen, H. Zwally, and J. Cosimo, 1999, "Arctic Sea Ice Extents, Areas, and Trends, 1978-1996," *Journal of Geophysical Research* 104C(9):20,837–20,856.

Parkinson, C.L., 2000, "Variability of Arctic Sea Ice: The View from Space, an 18-Year Record," *Arctic* 53(4):341–358.

Parks, S.E., C.W. Clark, and P.L. Tyack, 2007, "Short- and Long-term Changes in Right Whale Calling Behavior: The Potential Effects of Noise on Acoustic Communication," *Journal of the Acoustical Society of America* 122:3725–3731.

Payne, J.R., D. McNabb, Jr., and J.R. Clayton, Jr., 1991, "Oil-Weathering Behavior in Arctic Environments," *Polar Research* 10(2):631–662.

Payne, J.R., G.D. McNabb. Jr., L.E. Hachmeister, B.E. Kirstein, J.R. Clayton Jr., C.R. Phillips, R.T. Redding, C.L. Clary, G.S. Smith, and G.H. Farmer, 1987, *Development of a Predictive Model for the Weathering of Oil in the Presence of Sea Ice*, Outer Continental Shelf Environmental Assessment Program, Research Unit 664, MMS.

Payne, J., S. Guyer, and B. Keating, 2003, "The Impact of Ice Roads on Tundra Ecosystems, National Petroleum Reserve, Alaska (NPRA) (Abstract)," in *Draft Proceedings of a Workshop on the Impacts of Winter Exploration Activities on Tundra Soils and Vegetation of Alaska's North Slope*, D. Yokel (ed.), BLM, Fairbanks, Alaska.

Perovich, D.K., J.A. Richeter-Menge, K.F. Jones, and B. Light, 2008, "Sunlight, Water, and Ice: Extreme Arctic Sea Ice Melt during the Summer of 2007," *Geophysical Research Letters* 35(11):L11501.

Perovich, D., W. Meier, J. Maslanik, and J. Richter-Menge, 2010, "Sea Ice Cover: Arctic Report Card: Update for 2010." Available at http://www.arctic.noaa.gov/reportcard/seaice.html. Accessed September 2, 2011.

Peterson, C.H., M.C. Kennicutt II, R.H. Green, P. Montagna, D.E. Harper, Jr., E.N. Powell, and P.F Roscigno, 1996, "Ecological Consequences of Environmental Perturbations Associated with Offshore Hydrocarbon Production: A Perspective on Long-Term Exposures in the Gulf of Mexico," *Canadian Journal of Fisheries and Aquatic Sciences* 53:2637–2654.

Peterson, C.H., 2000, "The *Exxon Valdez* Oil Spill in Alaska: Acute, Indirect, and Chronic Effects on the Ecosystem," *Adv. Mar. Biol.* 39:3–84.

Peterson, C.H., S.D. Rice, J.W. Short, D. Esler, J.L. Bodkin, B.E. Ballachey, and D.B. Irons, 2003, "Long-Term Ecosystem Responses to the *Exxon Valdez* Oil Spill," *Science* 302:2082–2086.

Petrae, G. (ed.), 1995, *Barge Morris J. Berman Spill, NOAA; Scientific Response*, Hazmat Report No. 95-10, National Oceanic and Atmospheric Administration, Hazardous Materials Response and Assessment Division, Seattle, Wash.

Pew Center on Global Climate Change, 2010, *What is Black Carbon?*, April. Available at http://www.pewclimate.org/global-warming-basics/blackcarbon-factsheet. Accessed September 5, 2011.

Pezeshki, S.R., M.W. Hester, Q. Lin, and J.A. Nyman, 2000, "The Effects of Oil Spill and Clean-up on Dominant U.S. Gulf Coast Marsh Macrophytes: A Review," *Environmental Pollution* 108:129–139.

Phillips, R.L., et al., 1988, *Geologic Investigations in the Chukchi Sea, 1984, NOAA Ship SURVEYOR Cruise*, Open File Report 88-25, U.S. Geological Survey.

Piatt, J.F., and P. Anderson,1996, "Response of Common Murres to the *Exxon Valdez* Oil Spill and Long-Term Changes in the Gulf of Alaska Marine Ecosystem," *Proceedings of the Exxon Valdez Oil Spill Symposium*, pp. 720–737, S.D. Rice et al. (eds.), American Fisheries Society Symposium 18, Bethesda, MD.

Piatt, J.F., and R.G. Ford, 1996, "How Many Seabirds Were Killed by the *Exxon Valdez* Oil Spill?," *Proceedings of the Exxon Valdez Oil Spill Symposium*, pp. 712–719. S.D. Rice et al. (eds.), American Fisheries Society Symposium 18, Bethesda, MD.

Pickart, R.S., 2004, "Shelfbreak Circulation in the Alaskan Beaufort Sea: Mean Structure and Variability," *Journal of Geophysical Research* 109(C4):C04024.

Pickart, R.S., L.J. Pratt, D.J. Torres, T.E. Whitledge, A.Y. Proshutinsky, K. Aagaard, T.A. Agnew, G. Moore, and H.J. Dail, 20110, "Evolution and Dynamics of the Flow through Herald Canyon in the Western Chukchi Sea," *Deep-Sea Research Part II: Topical Studies in Oceanography* 57(1-2)5–26.

Picou, S., 2010, *Helping Others: A Community Peer Listener Training Program*, training session presented at Louisiana State University, Baton Rouge, La., July 28. Available at http://gulfseagrant.tamu.edu/oilspill/index.htm. Accessed June 15, 2011.

Picou, J.S., and C. Arata, 1997, "Chronic Psychological Impacts of the Exxon Valdez Oil Spill: Resource Loss and Commercial Fishers," Appendix J in *Coping with Technological Disasters: A User Friendly Guidebook*, Prince William Sound Regional Citizens' Advisory Council, Anchorage, Alaska.

Picou, J.S., and D.A. Gill, 1996, "The *Exxon Valdez* Oil Spill and Chronic Psychological Stress," pp. 879–893 in *Proceedings of the* Exxon Valdez *Oil Spill Symposium*, Anchorage, Alaska, Feb. 2–5, 1993, American Fisheries Society, Bethesda, Md.

Picou, J.S., G.D. Johnson, and D.A. Gill, 1999, "Mitigating the Chronic Community Impacts of Localized Environmental Degradation: A Case Study of the *Exxon Valdez* Oil Spill," Appendix K in *Coping with Technological Disasters: A User Friendly Guidebook*, Prince William Sound Regional Citizens' Advisory Council, Anchorage, Alaska.

Picou, J.S., C. Formichella, B.K. Marshall, and C. Arata, 2009 "Community Impacts of the *Exxon Valdez* Oil Spill: A Synthesis and Elaboration of Social Science Research," pp. 279–310 in *Synthesis: Three Decades of Research on Socioeconomic Effects Related to Offshore Petroleum Development in Coastal Alaska*, S.R. Braud and J. Kruse (eds.), MMS OCS Study No. 2009-006, Stephen R. Braud & Associates, Anchorage, Alaska.

Pike Research, 2009, *Electric Vehicle Batteries — Lithium Ion batteries for Plug-in Hybrid and Battery Electric Vehicles: Market Analysis and Forecast*. Available at http://www.pikeresearch.com/research/electric-vehicle-batteries. Accessed August 20, 2011.

Pimentel, D., L. Lach, R. Zuniga, and D. Morrison. 2000. "Environmental and Economic Costs of Non-Indigenous Species in the United States." *Bioscience* 50(1): 53–65.

Pimentel, D., R. Zuniga, and D. Morrison. 2005. "Update on the Environmental and Economic Costs Associated with Alien-Invasive Species in the United States." *Ecological Economics* 52(3):273–288.

Ping, C.-L., G.J. Michaelson, L. Guo, M.T. Jorgenson, M. Kanevskiy, Y. Shur, F. Dou, and J. Liang, 2011, "Soil Carbon and Material Fluxes across the Eroding Alaska Beaufort Sea Coastline," *Journal of Geophysical Research* 116:G0200.

Pira International, 2010, *The Future of Bioplastics for Packaging to 2020*, December 13. Available at http://www.pira-international.com/pha-and-bio-derived-pe-to-drive-bioplastic-packaging-market-to-2020.aspx. Accessed August 21, 2011.

PlasticsEurope, EuPC, EuPR, and EPRO, 2010, *Plastics – the Facts 2010*. Available at http://www.plasticseurope.org/documents/document/20101006091310-final_plasticsthefacts_28092010_lr.pdf. Accessed August 21, 2011.

Popper, A.N., and M.C. Hastings, 2009, "The Effects of Anthropogenic Sources of Sound on Fishes," *Journal of Fish Biology* 75:455–489.

Potter, R.A., and T.J. Weingartner, 2010, *Surface Circulation Radar Mapping in Alaskan Coastal Waters: Beaufort Sea and Cook Inlet*, OCS Study MMS 2009-049, School of Fisheries and Ocean Sciences, University of Alaska, Fairbanks, Alaska.

Prince, P.K., 1990, "Current Drilling Practice and the Occurrence of Shallow Gas," in *Safety in Offshore Engineering: Proceedings of an International Conference*, April 25–26, London.

Prince, R.C., E.H. Owens, and G.A. Sergy, 2002, "Weathering of an Arctic Oil Spill over 20 Years: The BIOS Experiment Revisited, Baffin Island Oil Spill," *Marine Pollution Bulletin* 44(11):1236–1242.

Proffitt, C.E. (ed.), 1998, *Effects and Management of Oil Spills in Marsh Ecosystems: A Review Produced from a Workshop Convened July 1996 at McNeese State University*, OCS Study MMS 98-0018, Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La.

Proshutinsky, A., M.A. Johnson, T.O. Proshutinsky, and J.A. Maslanik, 2003, *Beaufort and Chukchi Sea Seasonal Variability for Two Arctic Climate States*, OCS Study MMS 20030-024, MMS, Fairbanks, Alaska.

Proshutinsky, A., V. Pavlov, and R.H. Bourke, 2001, "Sea Level Rise in the Arctic Ocean," *Geophysical Research Letters* 28(11):2237–2240.

Pugh, R.S., and P.R. Becker, 2001, *Sea Turtle Contaminants: A Review with Annotated Bibliography*, NISTIR 6700, Charleston, S.C.

Pullman, E.R., M.T. Jorgenson, T.C. Cater, W.A. Davis, and J.E. Roth, 2003, *Assessment of Ecological Effects of the 2002-2003 Ice Road Demonstration Project*, unpublished report, ConocoPhilips Alaska, Inc., Anchorage, Alaska.

Quigley, D.C., J.S. Hornafius, B.P. Luyendyk, R.D. Francis, J. Clark, and L. Washburn, 1999, "Decrease in Natural Marine Hydrocarbon Seepage near Coal Oil Point, California, Associated with Offshore Oil Production," *Geology* 27:1047–1050.

Quigley, R., L. den Broeder, P. Furu, A. Bond, B. Cave, and R. Bos, 2006, *Health Impact Assessment International Best Practice Principles*, Special Publication Series No. 5, International Association for Impact Assessment, Fargo.

Rabalais, N.N., 2005, *Relative Contribution of Produced Water Discharge in the Development of Hypoxia*, OCS Study MMS 2005-044, Minerals Management Service, Gulf of Mexico Outer Continental Shelf Region, New Orleans, La.

Rabalais, N.N., L.E. Smith, C.B. Henry, Jr., P.O. Roberts, and E.B. Overton, 1998, *Long-Term Effects of Contaminants from OCS-Produced Water Disharges at Pelican Island Facility, Louisiana*, OCS Study MMS 98-0039. U.S. Department of the Interior, Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, LA.

Rabalais, N.N., B.A. McKee, D.J. Reed, and J.C. Means, 1991, *Fate and Effects of Nearshore Discharges of OCS Produced Waters, Volume II: Technical Report*, OCS Study MMS 91-0005, Minerals Management Service, Gulf of Mexico Outer Continental Shelf Region, New Orleans, La.

Rahn, K.A. 1982. "On the Causes, Characteristics and Potential Environmental Effects of Aerosol in the Arctic Atmosphere," In: *The Arctic Ocean: The Hydrographic Environment and the Fate of Pollutants*, L. Ray (editor), John Wiley and Sons, New York, N.Y., pp.163–195.

Rappeport, M.L., 1982, *An Analysis of Oceanographic and Meteorological Conditions for Central Lower Cook Inlet, Alaska*, U.S. Geological Survey, Open-File Report 82-128.

Ray, G.L., 2005, *Invasive Animal Species in Marine and Estuarine Environments: Biology and Ecology*, ERDC/EL TR-05-2, Aquatic Nuisance Species Research Program, January. Available at http://dodreports.com/pdf/ada430308.pdf. Accessed September 6, 2011.

RDC (Resource Development Council), 2011, *Alaska's Oil and Gas Industry – Background*. Available at http://www.akrdc.org/issues/oilgas/overview.html. Accessed July 19, 2011.

Reger, D.R., J.D. McMahan, and C.E. Holmes, 1992, *Effect of Crude Oil Contamination on Some Archaeological Sites in the Gulf of Alaska, 1991 Investigations*, Office of History and Archaeology Report No. 30, Alaska Department of Natural Resources, Division of Parks and Outdoor Recreation, Anchorage, Alaska.

Regulations for Implementing NEPA. 40 CFR 1508.8; 1978.

Reimnitz, E., and E.W. Kempema, 1982, *High Rates of Bedload Transport Measured from Infilling Rate of Large Strudel-Scour Craters in the Beaufort sea Alaska*, U.S. Geological Survey, Open-File Report 82-588.

Reimnitz, E., and P.W. Barnes, 1974, "Sea Ice as a Geologic Agent on the Beaufort Sea Shelf of Alaska," pp. 301–351in *The Coast and Shelf of the Beaufort Sea*, Arctic Institute of North America, Arlington, Va.

Research Development Council, 2007, *Alaska's Mining Industry – Background*. Available at http://www.akrdc.org/issues/mining/overview.html. Accessed September 25, 2011.

Restore the Gulf, 2010a, *Deepwater Horizon Response Consolidated Fish and Wildlife Collection Report*, November 2. Available at http://www.restorethegulf.gov/sites/default/files/documents/pdf/Consolidated%20Wildlife%20Table%20110210.pdf. Accessed November 10, 2010.

Restore the Gulf, 2010b. *America's Gulf Coast: A Long Term Recovery Plan after the Deepwater Horizon Oil Spill*. Available at http://www.restorethegulf.gov/sites/default/files/documents/pdf/gulf-recovery-sep-2010.pdf. Accessed April 22, 2011.

Reynolds, P.E., K.J. Wilson, and D.R. Klein, 2002, "Section 7: Muskoxen," pp. 54–64 in *Arctic Refuge Coastal Plain Terrestrial Wildlife Research Summaries*, D.C. Douglas, P.E. Reynolds, and E.B. Rhodes (eds.), U.S. Geologic Survey, Biological Resources Division, Biological Science Report USGS/BRD/BSR-2002-0001.

Rhea, S., et al., 2010, *Seismicity of the Earth 1900–2007, Aleutian Arc and Vicinity*, U.S. Geological Survey Open-File Report 2010-1083-B (map sheet 1:5,000,000).

Richards, W.J., and T. Potthoff, 1980, "Distribution and Seasonal Occurrence of Larval Pelagic Stages of Spiny Lobsters (*Palinuridae, Panulirus*) in the Western Tropical Atlantic," *Proceedings of the Gulf and Caribbean Fishery Institute* 33:244–252.

Richards, W.J., M.F. McGowan, T. Leming, J.T. Lampkin, and S. Kelley, 1993, "Larval Fish Assemblages at the Loop Current Boundary in the Gulf of Mexico," *Bulletin of Marine Science* 53:475–537.

Richardson, W.J., and B. Würsig, 1997, "Influences of Man-made Noise and Other Human Actions on Cetacean Behaviour," *Marine and Freshwater Behaviour and Physiology* 29:183–209.

Richardson, W.J., B. Würsig, and C.R. Greene, Jr., 1986, "Reactions of Bowhead Whales, *Balaena mysticetus*, to Seismic Exploration in the Canadian Beaufort Sea," *Journal of the Acoustical Society of America* 79(4):1117–1128.

Richardson, W.J., B. Würsig, and C.R. Greene, Jr., 1990, "Reactions of Bowhead Whales, *Balaena mysticetus*, to Drilling and Dredging Noise in the Canadian Beaufort Sea," *Marine Environmental Research* 29:135–160.

Richardson, W.J., C.R. Greene, Jr., W.R. Koski and M.A. Smultea, with G. Cameron, C. Holdsworth, G. Miller, T. Woodley, and B. Würsig, 1991, *Acoustic Effects of Oil Production Activities on Bowhead and White Whales Visible During Spring Migration Near Pt. Barrow, Alaska – 1990 Phase*, OCS Study MMS 91-0037, report prepared for Minerals Management Service, Herndon, Va. Available at http://www.alaska.boemre.gov/reports/1990rpts/91_0037/91_0037_1.pdf. Accessed May 22, 2011.

Richardson, W.J., C.R. Greene, Jr., C.I. Malme, and D.H. Thomson, 1995, *Marine Mammals and Noise*, Academic Press, San Diego.

Richardson, W.R., G.W. Miller, and C.R. Greene, Jr., 1999, "Displacement of Migrating Bowhead Whales by Sounds from Seismic Surveys in Shallow Waters of the Beaufort Sea," *Journal of the Acoustical Society of America* 106(4):2281.

Richter-Menge and M. Jeffries (eds.), 2010, *The Arctic* in "State of the Climate in 2010," *Bull. Amer. Meteor. Soc*. 92(6):S143–S160.

Ridgway, S.H., E.G. Wever, J.G. McCormick, J. Palin, and J.H. Anderson, 1969, "Hearing in the Giant Sea Turtle, *Chelonia mydas*," *Proc. Nat. Acad. Sci.* 64(3):884–890.

Riedman, M.L., 1983, *Studies of the Effects of Experimentally Produced Noise Associated with Oil and Gas Exploration and Development on Sea Otters in California*, NTIS No. PB86-21-8575. University of California, Santa Cruz, Calif.

Roberts, H.H., 2001a, "Fluid and Gas Expulsion on the Northern Gulf of Mexico Continental Slope: Mud-Prone to Mineral-Prone Responses," *Geophysical Monograph* 124:145–161.

Roberts, H.H., 2001b, *Improved Geohazards and Benthic Habitat Evaluations: Digital Acoustic Data with Ground Truth Calibrations, Final Report*, OCS Study MMS 2001-050, Coastal Marine Institute, MMS Gulf of Mexico OCS Region, July.

Roberts, H.H., and P. Aharon, 1994, "Hydrocarbon-Derived Carbonate Buildups of the Northern Gulf of Mexico Continental Slope: A Review of Submersible Investigations," *Geo-Marine Letters* 14:135–148.

Roberts, H.H., J.M. Coleman, and R.H. Peele, 2005, *Mapping Areas of Hard Bottom and Other Important Bottom Types: Outer Continental Shelf and Upper Continental Slope*, OCS Study MMS 2005-067, prepared by Coastal Studies Institute, Louisiana State University, for Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La., Dec.

Roth, A.-M.F., and D.M. Baltz, 2009, "Short-Term Effects of an Oil Spill on Marsh-Edge Fishes and Decapod Crustaceans." *Estuaries and Coasts* 32:565–572.

Rothrock, D., Y. Yu, and G. Maykut, 1999, "Thinning of the Arctic Sea-Ice Cover," *Geophysical Research Letters* 26(23):3469–3472.

Rothrock, D.A., and J. Zhang, 2005, "Arctic Ocean Sea Ice Volume: What Explains Its Recent Depletion?" *Journal of Geophysical Research* 110(C1):C01002.

Rovegno, P.S., C.A. Edwards, and K.W. Bruland, 2009, "Observations of a Kenai Eddy and a Sitka Eddy in the Northern Gulf of Alaska," *Journal of Geophysical Research* 114(C11):C11012.

Royal Society of Canada, 2004, *Report of the Expert Panel on Science Issues Related to Oil and Gas Activities, Offshore Brittish Columbia*, Ottawa, Ontario, February.

Rozas, L.P., T.J. Minello, and C.B. Henry, 2000, "An Assessment of Potential Oil Spill Damage to Salt Marsh Habitats and Fishery Resources in Galveston Bay, Texas," *Marine Pollution Bulletin* 40:1148–1160.

Rumbold, D.G., P.W. Davis, and C. Perretta, 2001, "Estimating the Effect of Beach Nourishment on Caretta caretta (*Loggerhead Sea Turtle*) Nesting," *Restoration Ecology* 9:304–310.

Russell, R.W., 2005, *Interactions between Migrating Birds and Offshore Oil and Gas Platforms in the Northern Gulf of Mexico: Final Report*, OCS Study MMS 2005-009. U.S. Department of the Interior, Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, LA.

Ryan, P.G., 1987, "The Incidence and Characteristics of Plastic Particles Ingested by Sea Birds," *Marine and Environmental Research* 23: 175–206.

Ryan, P.G., 1988, "Effects of Ingested Plastic on Seabird Feeding: Evidence from Chickens," *Marine Pollution Bulletin* 19: 174–176.

Ryan, P.G., 1990, "The Effects of Ingested Plastic and Other Marine Debris on Seabirds," *Proceedings of the Second International Conference on Marine Debris*, April 2–7, 1989, Honolulu, HI, pp. 623–634, R.S. Shomura and M.L. Godfrey (eds.), NOAA Technical Memorandum NMFS-NOAA-TM-NMFS-SWFSC-154, U.S. Department of Commerce, Washington, D.C.

Sammarco, P.W., A.D. Atchison, and G.S. Boland, 2004, "Expansion of Coral Communities within the Northern Gulf of Mexico via Offshore Oil and Gas Platforms," *Marine Ecology Progress Series* 280:129–143.

SCADA (South Central Alaska Dipnetters Association), 2011, "Home Page South Central Alaska Dipnetters Association," Wasilla, Alaska. Available at http://www.donbowers.com/DipNet/menu1.htm. Accessed September 19, 2011.

Schaum, J., M. Cohen, S. Perry, R. Artz, R. Draxler, J.B. Frithsen, D. Heist, M. Lorber, and L. Phillips, 2010, "Screening Level Assessment of Risks Due to Dioxin Emissions from Burning Oil from the BP Deepwater Horizon Gulf of Mexico Spill," *Environ. Sci. Tech.* 44(24):9483–9389.

Schick, R.S., and D.L. Urban, 2000, "Spatial Components of Bowhead Whale (*Balaena mysticetes*) Distribution in the Alaskan Beaufort Sea, *Canadian Journal of Fisheries and Aquatic Sciences* 57:2193–2200.

Schmahl, G.P., E.L. Hickerson, D.C. Weaver, and J.V. Gardner, 2011, *High-Resolution Multibeam Mapping and Habitat Characterization of Topographic Features in the Northwestern Gulf of Mexico*, GulfBase.org — Resource Database for Gulf of Mexico Research. Available at http://www.thsoa.org/hy03/2_2.pdf. Accessed January 20, 2011.

Serreze, M., J. Maslanik, T. Scambos, F. Fetterer, J. Stroeve, K. Knowles, C. Fowler, S. Drobot, R. Barry, and T. Haran, 2003, "A Record Minimum Arctic Sea Ice Extent and Area in 2002," *Geophysical Research Letters* 30(3):1110.

Shapiro, L.H., and P.W. Barnes, 1991, "Correlation of Nearshore Ice Movement with Seabed Ice Gouges near Barrow, Alaska," *Journal of Geophysical Research* 96(C9):16,979–16,9889.

Sharma, G.D., and D.C. Burrell, 1970, "Sedimentary Environment and Sediments of Cook Inlet, Alaska," *The American Association of Petroleum Geologists Bulletin* 54(4):647–654.

Shelden, K.E.W., and D.J. Rugh, 1995, "The Bowhead Whale, *Balaena mysticetus*: Its Historic and Current Status," *Marine Fisheries Review* 57 (3-4):1–20.

Shell, 2009a, *Exploration Plan, 2010 Exploration Drilling Program, Posey Blocks 6713, 6714, 6763, 6764, and 6912; Karo Blocks 6864 and 7007; Burger Crackerjack, and SW Shoebill Prospects, OCS Lease Sale 193, Chukchi Sea, Alaska*, Public Information Copy submitted to Minerals Management Service, Alaska OCS Region by Shell Gulf of Mexico, Anchorage, July.

Shell 2009b, *Environmental Impact Analysis, 2010 Exploration Drilling Program, Posey Blocks 6713, 6714, 6763, 6764, and 6912; Karo Blocks 6864 and 7007; Burger Crackerjack, and SW Shoebill Prospects, OCS Lease Sale 193, Chukchi Sea, Alaska*, Shell Gulf of Mexico, Anchorage, July.

Shen, H.T., and P.D. Yapa, 1988, "Oil Slick Transport in Rivers," *Journal of Hydraulic Engineering* 114(5):529–533.

Sherwood, K.W., and J.D. Craig, 2001, *Prospects for Development of Alaska Natural Gas: A Review (as of January 2001)*, U.S. Department of the Interior Minerals Management Service, Resource Evaluation Office.

Shideler, G.L., 1985, "Regional Geologic Framework of Eastern Gulf of Mexico OCS Region," in *Summary Report on the Regional Geology, Petroleum Geology, and Estimates of Undiscovered Recoverable Oil and Gas Resources in the Planning Area of the Proposed Outer Continental Shelf Oil and Gas Lease No. 94, Eastern Gulf of Mexico*, U.S. Geological Survey Open File Report 85-669, R.Q. Foote (ed.).

Shideler, D., 1993, "Chapter 5 Deterrent Methods," pp. 35–50 in *Guidelines for Oil and Gas Operations in Polar Bear Habitats*, Truett, J.C. (ed.),. OCS Study MMS 93-0008, report for Minerals Management Service, Washington, D.C. Available at http://www.alaska.boemre.gov/reports/1990rpts/93_0008.pdf. Accessed April 22, 2011.

Shiels, W.E., J.J. Goering, and D.W. Hood, 1973, "Crude Oil Phytotoxicity Studies," pp. 143–446 in *Environmental Studies of Port Valdez*, D.W. Hood, W.E. Shiels, and E.J. Kelley (eds.), Occasional Publication 3, University of Alaska, Institute of Marine Sciences.

Shinn, E.A., B.H. Lidz, and C.D. Reich, 1993, *Habitat Impacts of Offshore Drilling: Eastern Gulf of Mexico*, OCS Study MMS 93-0021, Minerals Management Service, Gulf of Mexico Outer Contintental Shelf Region, New Orleans, La.

Short, J.W., G.V. Irvine, D.H. Mann, J.M. Maselko, J.J. Pella, M.R. Lindeberg, J. R. Payne, W.B. Driskell, and S.D. Rice, 2007, "Slightly Weathered *Exxon Valdez* Oil Persists in Gulf of Alaska Beach Sediments after 16 Years," *Environmental Science and Technology* 41:1245–1250.

Short, J.W., M.R. Lindberg, P.M. Harris, J.M. Maselko, J.J. Pella, and S.D. Rice, 2004, "Estimate of Oil Persisting on the Beaches of Prince William Sound 12 Years after the *Exxon Valdez* Oil Spill," *Environmental Science and Technology* 38(1)19–25.

Sis, R.F., A.M. Landry, and G.R. Bratton, 1993, "Toxicology of Stranded Sea Turtles," in *Proceedings, 24th Annual International Association of Aquatic Animal Medicine Conference*, Chicago, Ill.

Skolnik, J. and C.D. Holleyman, 2005, *Modeling the Economic Impacts of Offshore Activities in the Alaska Arctic*. Available at http://www.mms.gov/ld/OCS_EIM_Upgrade/Arctic%20IMPAK%20Journal%20Article.pdf. Accessed January 26, 2011.

Smith, M.E., A.S. Kane, and A.N. Popper, 2004, "Noise-Induced Stress Response and Hearing Loss in Goldfish (*Carassius auratus*)," *Journal of Experimental Biology* 207:427–435.

Smith, T.S., S.T. Partridge, S.C. Amstrup, and S. Schliebe, 2007, "Post-Den Emergence Behavior of Polar Bears (*Ursus maritimus*) in Northern Alaska," *Arctic* 60:187–194.

Solar Rating and Certification Corporation, undated, *Solar Facts – System Ratings: OG-300 Certification of Solar Water Heating Systems*. Available at http://www.solar-rating.org/facts/system_ratings.html. Accessed August 20, 2011.

Southall, B.L., A.E. Bowles, W.T. Ellison, J.J. Finneran, R.L. Gentry, C.R. Greene, Jr., D. Kastak, D.R. Ketten, J.H. Miller, P.E. Nachtigall, W.J. Richardson, J.A. Thomas, and P.L. Tyack, 2007, "Marine Mammal Noise Exposure Criteria: Initial Scientific Recommendations" *Aquatic Mammals* 33:411–522.

Spall, M.A., R.S. Pickart, P.S. Fratantoni, and A.J. Plueddemann, 2008, "Western Arctic Shelfbreak Eddies: Formation and Transport," *Journal of Physical Oceanograph*y 38(8):1644–1668.

Stabeno, P., N. Bond, A. Hermann, N. Kachel, C. Mordy, and J. Overland, 2004, "Meteorology and Oceanography of the Northern Gulf of Alaska," *Continental Shelf Research* 24(7-8):859–897.

Stafford, K.M., C.G. Fox, and D.S. Clark, 1998, "Long Range Acoustic Detection and Localization of Blue Whale Calls in the Northeast Pacific Ocean," *Journal of the Acoustical Society of America* 104(6): 3616–3625.

Starr, S.J., M.N. Kuwada, and L.L. Trasky, 1981, *Recommendations for Minimizing the Impacts of Hydrocarbon Development on Fish, Wildlife and Aquatic Plant Resources of the Northern Bering Sea and Norton Sound, State of Alaska*, Alaska Department of Fish and Game, Habitat Division, Anchorage, Alaska.

State of Alaska, 2011, *Major Oil Spills to Coastal Waters, Division of Spill Prevention and Response – Prevention and Emergency Response*. Available at http://www.dec.state.ak.us/spar/perp/bigspills.htm. Accessed Aug. 19, 2011.

Stevens, D.S.P., and P.A. Craw, 2004, *Geologic Hazards on and near the Northern Coast of the Alaska Peninsula*, Miscellaneous Publication 134, Alaska Division of Geological and Geophysical Surveys, May.

Stevens, M.A., and D.J. Boness, 2003, "Influences of Habitat Features and Human Disturbance on the Use of Breeding Sites by a Declining Population of Southern Fur Seals (*Arctocephalus australis*)," *Journal of Zoology* 260:145–152.

Stewart, E.J., S.E.L. Howell, D. Draper, J. Yackel, and A. Tivy, 2007, "Sea Ice in Canada's Arctic: Implications for Cruise Tourism," *Arctic* 60(4):370–380.

Stickney, A., 1991, "Seasonal Patterns of Prey Availability and the Foraging Behavior of Arctic Foxes (*Alopex lagopus*) in a Waterfowl Nesting Area," *Canadian Journal of Zoology* 69(11): 2853–2859.

Stone, G.W., N.D. Walker, S.A. Hsu, A. Babin, B. Liu, B.D. Keim, W. Teague, D. Mitchell, and R. Leben, 2005, "Hurricane Ivan's Impact along the Northern Gulf of Mexico," *EOS* 86(48):497.

Stover, C.W., and J.L. Coffman, 1993, *Seismicity of the United States 1568-1989 (Revised),* U.S. Geological Survey Professional Paper 1527.

Stringer, W.J., 1980, *The Role of Sea Ice as a Physical Hazard and a Pollutant Transport Mechanism in the Bering Sea, A Special Report to Outer Continental Shelf Environmental Assessment Program*, Arctic Research Unit 267, Geophysical Institute, University of Alaska.

Stringer, W.J., and W.M. Sackinger, 1976, "Ice Hazards to Offshore Oil Operations in Arctic Alaskan Waters," in *31st Annual Petroleum Mechanical Engineering Conference*, Mexico City, Mexico, September 16–19.

Stroeve, J., M. Serreze, F. Fetterer, T. Arbetter, W. Meier, J. Maslanik, and K. Knowles, 2005, "Tracking the Arctic's Shrinking Ice Cover: Another Extreme September Minimum in 2004," *Geophysical Research Letters* 32(4):1–4.

Sturges, W., 1993, "The Annual Cycle of the Western Boundary Current in the Gulf of Mexico," *Journal of Geophysical Research* 98(C10):18053–18068.

Sturges, W., and J. Blaha, 1975, "A Western Boundary Current in the Gulf of Mexico," *Science* 192:367–369.

Sturges, W., and K.E. Kenyos, 2008, "Mean Flow in the Gulf of Mexico," *Journal of Physical Oceanography* 38(7):1501–1514.

Sturges, W., E. Chassignet, and T. Ezer, 2004, *Strong Mid-depth Currents and a Deep Cyclonic Gyre in the Gulf of Mexico: Final Report*, OCS Study MMS 2004-040, MMS, Gulf of Mexico OCS Region, New Orleans, La.

Sturges, W., N.G. Hoffmann, and R.R. Leben, 2010, "A Trigger Mechanism for Loop Current Ring Separations," *Journal of Physical Oceanography* 40(5):900–913.

Suleimani, E.N., et al., 2002, *Tsunami Hazard Maps of the Kodiak Area, Alaska*, Report of Investigations 2002-01, Alaska Department of Natural Resources, Division of Geological and Geophysical Surveys. Available (with 1:12,500 maps) at http://www.dggs.alaska.gov/webpubs/dggs/ri/text/ri2002_001.PDF. Accessed June 23, 2011.

Suydam, R.S., and J.C. George, 1992, "Recent Sightings of Harbour Porpoises, *Phocoena phocoena*, near Point Barrow, Alaska," *Canadian Field-Naturalist* 106(4):489–492.

Suleimani, E.N., et al., 2005, *Tsunami Hazard Maps of the Homer and Seldovia Areas, Alaska*, Report of Investigations 2005-2, Alaska Department of Natural Resources, Division of Geological and Geophysical Surveys. Available (with 1:12,500 maps) at http://www.dggs.dnr.state.ak.us/pubs/pubs?reqtype=citation&ID=14474. Accessed June 15, 2011.

Taylor, E., and D. Reimer, 2008, "Oil Persistence on Beaches in Prince William Sound – A Review of SCAT Surveys Conducted from 1989 to 2002," *Marine Pollution Bulletin* 56:458–474.

Teague, W., E. Jarosz, D. Wang, and D. Mitchell, 2007, "Observed Oceanic Response over the Upper Continental Slope and Outer Shelf during Hurricane Ivan," *Journal of Physical Oceanography* 37(9):2181–2206.

Teague, W.J., E. Jarosz, M. Carnes, D. Mitchell, and P. Hogan, 2006a, "Low-Frequency Current Variability Observed at the Shelfbreak in the Northeastern Gulf of Mexico: May-October, 2003," *Continental Shelf Research* 26:2559–2582.

Teague, W.J., E. Jarosz, T.R. Keen, D.W. Wang, and M.S. Hulbert, 2006b, "Bottom Scour Observed under Hurricane Ivan," *Geophysical Research Letters* 33:L07607.

Tech Environmental, Inc., 2006, *Final EIR Underwater Noise Analysis*, Report No. 5.3.2-2, Appendix 3.13-B, Cape Wind Energy Project, Nantucket Sound, Waltham, Mass.

Teo, S.L.H., AM. Boustany, and B.A. Block, 2007, "Oceanographic Preferences of Atlantic Bluefin Tuna, *Thunnus thynnus*, on Their Gulf of Mexico Breeding Grounds," *Marine Biology* 152:1105–1119.

TEWG (Turtle Expert Working Group), 2007, *An Assessment of the Leatherback Turtle Population in the Atlantic Ocean*, NOAA Technical Memorandum NMFS-SEFSC-555.

Thomas, D.R., 1983, "Interaction of Oil with Arctic Sea Ice," in *The Alaskan Beaufort Sea*, P. Barnes, E. Reimnitz, and D. Schell (eds.), Academic Press, New York, N.Y.

Thompson, J.J., E.A. Shinn, and T.J. Bright, 1980, *Effects of Drilling Mud on Seven Species of Reef-Building Corals as Measured in the Field and Laboratory*, Elsevier Scientific Publishing Company, Amsterdam.

Thompson, J., et al., 2005, "Sonar Surveys for Pipeline Inspection Show Extent of Pipeline Displacement and Seafloor Instability Following Hurricane Ivan," *Proc. Offshore Technology Conference*, Houston, Texas, OTC Paper No. 17738.

Thurston, D.K., and L.A. Theiss, 1987, *Geologic Report for the Chukchi Sea Planning Area, Alaska – Regional Geology, Petroleum Geology, and Environmental Geology*, OCS Report MMS 87-0046, March.

Till, A.B., et al., 1990, *Redoubt Volcano, Cook Inlet, Alaska: A Hazard Assessment Based on Eruptive Activity through 1968*, U.S. Geological Survey Open File Report 90-246.

Todd, S., P. Stevick, J. Lien, F. Marques, and D. Ketten, 1996, "Behavioral Effects of Exposure to Underwater Explosions in Humpback Whales (*Megaptera novaeangliae*)," *Canadian Journal of Zoology* 74:1661–1672.

Toimil, L.J., 1978, *Ice-Gouged Microrelief on the Floor of the Eastern Chukchi Sea, Alaska: A Reconnaissance Survey*, Open File Report 78-693, U.S. Geological Survey.

Tornfelt, E.E., and M. Burwell, 1992, *Shipwrecks of the Alaskan Shelf and Shore: The April 1, 1999 Database*, OCS Study MMS 92-0002, MMS, Alaska OCS Region, Anchorage, Alaska.

Trefry, J.H., K.L. Naito, R.P. Trocine, and S. Metz, 1995, "Distribution and Bioaccumulation of Heavy Metals from Produced Water Discharges to the Gulf of Mexico," *Water Science and Technology* 32: 31–36.

Trefry, J.H., R.D. Rember, R.P. Trocine, and M. Savoie, 2004, *Sources, Concentrations and Dispersion Pathways for Suspended Sediment in the Coastal Beaufort Sea*, OCS Study MMS 2004-032, Minerals Management Service, Alaska Outer Continental Shelf Region, Anchorage, Alaska.

Troutman, S.M., and R.G. Stanley, 2003, *Maps Showing Sedimentary Basins, Surface Thermal Maturity, and Indications of Petroleum in the Central Alaska Province*, U.S. Geological Survey Miscellaneous Field Studies Map, MF-2428.

Truett, J.C., M.E. Miller, and K. Kertell, 1997, "Effects of Arctic Alaska Oil Development on Brant and Snow Geese," *Arctic* 50(2): 138–146.

Tucker and Associates, 1990, "Sea Turtles and Marine Mammals of the Gulf of Mexico," in *Proceedings of a Workshop Held in New Orleans*, August 1–3, 1989, OCS Study MMS 90-009.

Tucker & Associates, Inc., 1990, *Sea Turtles and Marine Mammals of the Gulf of Mexico, Proceedings of a Workshop Held in New Orleans, August 1-3, 1989*, OCS Study MMS 90-0009, Minerals Management Service, Gulf of Mexico OCS Region. Available at http://www.gomr.boemre.gov/PI/PDFImages/ESPIS/3/3661.pdf. Accessed April 16, 2011.

Turner, C., and M. Frankel, 2008, *Energy Performance of LEED for New Construction Buildings*, New Buildings Institute, March 4. Available at http://www.usgbc.org/ ShowFile.aspx?DocumentID=3930. Accessed August 21, 2011.

Turner, R.E., J.M. Lee, and C. Neill, 1994, "Backfilling Canals to Restore Wetlands: Empirical Results in Coastal Louisiana," *Wetlands Ecology and Management* 3(1):63–78.

Tunez, J.I., H.L. Cappozzo, and M.H. Cassini, 2008, "Natural and Anthropogenic Factors Associated with the Distribution of South American Sea Lion along the Atlantic Coast," *Hydrobiologia* 598:191–202.

Tyack, P.L., 2009, "Human-Generated Sound and Marine Mammals," *Physics Today* 62(11):39–44.

U.K. National Nonfood Crop Centre, 2010, *Renewable Polymers Factsheet: Bioplastics*, February 19. Available at http://www.nnfcc.co.uk/publications/nnfcc-renewable-polymers-factsheet-bioplastics. Accessed August 21, 2011.

United Health Foundation, 2009, *America's Health Rankings 2009: Louisiana*. Available at http://www.dhh.louisiana.gov/offices/publications/pubs-81/American_Health_Rankings_Louisiana.pdf. Accessed September 26, 2011.

United Nations Educational, Scientific and Cultural Organization – Intergovernmental Oceanographic Commission (UNESCO-IOC). 2010. M*arine Spatial Planning Initiative*. Available at http://www.unesco-ioc-marinesp.be.

URS Corporation, 2005, *North Slope Borough Comprehensive Plan*, prepared for The North Slope Borough, October. Available at http://www.north-slope.org/information/comp_plan/MasterTOC_%20Mayors%20Forward06.pdf. Accessed April 27, 2011.

U.S. Green Building Council, 2011a, *About LEED*, March. Available at http://www.usgbc.org/DisplayPage.aspx?CMSPageID=1720 Accessed August 21, 2011.

U.S. Green Building Council, 2011b, *LEED for Homes*, May. Available at http://www.usgbc.org/DisplayPage.aspx?CMSPageID=1720. Accessed August 21, 2011.

USACE (U.S. Army Corps of Engineers), 1999, *Final Environmental Impact Statement: Beaufort Sea Oil and Gas Development/Northstar Project*, U.S. Army Engineer District, Anchorage, Alaska.

USACE, 2010, *Navigation Data Center: U.S. Waterborne Container Traffic by Port/Waterway in 2009*. Accessed at http://www.ndc.iwr.usace.army.mil/wcsc/by_porttons09.html. Accessed July 27, 2011.

USACE, 2011, *Ocean Disposal Database — Alaska District (Pacific Ocean Division), Galveston District (Southwestern Division), New Orleans District (Mississippi Valley Division), and Mobile and Jacksonville Districts (South Atlantic Division)*. Available at http://el.erdc.usace.army.mil/odd/. Accessed July 12, 2011.

USCB (U.S. Census Bureau), 2009a, *Annual Estimates of the Resident Population for the United States, Regions, States, and Puerto Rico: April 1, 2000 to July 1, 2009*, NST-EST2009-01. Available at http://www.census.gov/popest/states/NST-ann-est.html. Accessed December 2009.

USCB, 2009b, *Annual Estimates of the Population of Metropolitan and Micropolitan Statistical Areas: April 1, 2000 to July 1, 2009.* Available at http://www.census.gov/popest/metro/CBSA-est2009-annual.html. Accessed March 2010.

USCG (U.S. Coast Guard), 2011, *2008 – 2010 Arctic Activity* (2010 Arctic Traffic Slide). Available at http://www.institutenorth.org/calendar/events/bering-strait-access-workshop. Accessed September 8, 2011.

USDOE and USDA (U.S. Department of Energy and U.S. Department of Agriculture), 2005, *Biomass as Feedstock for a Bioenergy and Bioproducts Industry: The Technical feasibility of a Billion-Ton Annual Supply*, April.

USDOE and USEPA (U.S. Department of Energy and U.S. Environmental Protection Agency), undated a, *Energy Star Solar Water Heaters*. Available at http://www.energystar.gov/index.cfm?fuseaction=find_a_product.showProductGroup&pgw_code=WSE. Accessed August 20, 2011.

USDOE and USEPA, undated b, *Energy Star Certified Buildings and Plants*. Available at http://www.energystar.gov/index.cfm?fuseaction=labeled_buildings.locator. Accessed August 20, 2011.

USDOE and USEPA, undated c, *Energy Star Qualified New Homes*. Available at http://www.energystar.gov/index.cfm?c=new_homes.hm_index. Accessed August 21, 2011.

USDOI (U.S. Department of the Interior), 2001, *Department of the Interior-Alaska Policy on Government-to-Government Relations with Alaska Native Tribes*, January 18.

USDOT (U.S. Department of Transportation), 2008, *Vessel Calls at U.S. Ports, Snapshot, 2007*, Office of Policy and Plans, Maritime Administration, Washington, D.C.

USDOT, 2009a, "Table 1-11. Number of U.S. Aircraft, Vehicles, Vessels, and Other Conveyances," in *National Transportation Statistics 2009*. http://www.bts.gov/publications/national_transportation_statistics/. Accessed June 2009.

USDOT, 2009b, "Table 4-23. Average Fuel Efficiency of U.S. Passenger Cars and Light Trucks," in *National Transportation Statistics 2009*. Available at http://www.bts.gov/publications/national_transportation_statistics/. Accessed January 2010.

USDOT, 2009c, Table 4-21: Energy Intensity of Certificated Air Carriers, All Services," in *National Transportation Statistics 2009*. Available at http://www.bts.gov/publications/national_transportation_statistics/. Accessed January 2010.

USDOT, 2009d, "Table 1-11: Number of U.S. Aircraft, Vehicles, Vessels, and Other Conveyances," in *National Transportation Statistics 2009*. Available at http://www.bts.gov/publications/national_transportation_statistics/. Accessed June 2009.

USDOT, 2010, "Table 4-6: Energy Consumption by Mode of Transportation (Trillion Btu)," in *National Transportation Statistics 2010*. Available at http://www.bts.gov/publications/national_transportation_statistics/. Accessed April 2010.

USDOT, 2011a, *Maritime Administration – Deepwater Port Licensing Program: Pending Applications.* Available at http://www.marad.dot.gov/ports_landing_page/deepwater_port_licensing/dwp_planned_ports/dwp_planned_ports.htm. Accessed July 18, 2011.

USDOT, 2011b, *Vessel Calls Snapshot, 2010,* Maritime Administration, Office of Policy and Plans, May.

USDOT, 2011c, *Maritime Administration — Deepwater Port Licensing Program: Pending Applications.* Available at http://www.marad.dot.gov/ports_landing_page/deepwater_port_licensing/dwp_planned_ports/dwp_planned_ports.htm. Accessed July 18, 2011.

USEPA (U.S. Environmental Protection Agency), 1992, *Workbook for Plume Visual Impact Screening and Analysis (Revised)*, EPA-454/R-92-023, Office of Air Quality Planning and Standards, Research Triangle Park, N.C., Oct.

USEPA, 1993, *Preliminary Determination Document, Prevention of Significant Deterioration Outer Continental Shelf, Proposed Exploratory Drilling for ARCO Alaska, Inc. in the Beaufort Sea, Alaska*, EPA Region 10, Seattle, Wash., June.

USEPA, 2001, *Visibility in Mandatory Federal Class I Areas (1994-1998) – A Report to Congress*, EPA-452/R01-008, Office of Air Quality Planning and Standards, Nov.

USEPA, 2008a, *Red Dog Mine Extension – Aqqaluk Project, Draft Supplemental Environmental Impact Statement*, Prepared by Tetra Tech, Inc., for the U.S. Environmental Protection Agency, Seattle, Washington.

USEPA, 2008b, *National Coastal Condition Report III*, EPA/842-R-08-002, Office of Research and Development/Office of Water, Washington D.C., Dec.

USEPA, 2008c, *Latest Findings on National Air Quality: Status and Trends Through 2006*, EPA-454/R-07-007, Jan.

USEPA, 2009, *Red Dog Mine Extension – Aqqaluk Project Final Supplemental Environmental Impact Statement*, prepared by Tetra Tech, Anchorage, Alaska, for the U.S. EPA Region 10, Oct. Available at http://www.reddogseis.com/Final_SEIS.asp. Accessed July 12, 2011.

USEPA, 2010a, *EPA Finalizes Regulations for the National Renewable Fuel Standard Program for 2010 and Beyond*, Office of Transportation and Air Quality, February. Available at http://www.epa.gov/otaq/renewablefuels/420f10007.pdf. Accessed August 20, 2011.

USEPA, 2010b, "Table 2: Recovery of Municipal Solid Waste, 1960 to 2009," in *Municipal Solid Waste in the United States: 2009 Facts and Figures*, December. Available at http://www.epa.gov/wastes/nonhaz/municipal/pubs/msw2009rpt.pdf. Accessed August 2011.

USEPA, 2010c, *Region 10: The Pacific Northwest – Current NPDES Permits in Alaska*. Available at http://yosemite.epa.gov/r10/water.nsf/NPDES+Permits/CurrentAK822. Accessed August 20, 2011.

USEPA, 2011a, *What Are the Six Common Air Pollutants?*. Available at http://www.epa.gov/oaqps001/urbanair/. Accessed July 18, 2011.

USEPA, 2011b, *Acid Rain*. Available at http://www.epa.gov/acidrain/. Accessed July 18, 2011.

USEPA, 2011c, *Ocean Dumping and Dredging Material Management.* Available at http://water.epa.gov/type/oceb/oceandumping/dredgedmaterial/dumpdredged.cfm. Accessed July 12, 2011.

USEPA, 2011d, *Region 6: Ocean Dumping Sites for Dredged Material*. Available at http://water.epa.gov/type/oceb/oceandumping/dredgedmaterial/regionsix.cfm. Accessed July 12, 2011.

USEPA, 2011e, *Region 4: Ocean Dumping Sites for Dredged Material*. Available at http://water.epa.gov/type/oceb/oceandumping/dredgedmaterial/regionfour.cfm. Accessed July 12, 2011.

USEPA, 2011f, *Hypoxia in the News — 2011 Forecast: Summer Hypoxic Zone Size, Northern Gulf of Mexico*. Available at http://water.epa.gov/type/watersheds/named/msbasin/gulfnews.cfm#2011forecast. Accessed July 28, 2011.

USEPA 2011g, *Beyond the Marine Protection Research and Sanctuaries Act (MPRSA).* Available at http://water.epa.gov/type/oceb/mprsa_beyond.cfm. Accessed July 12, 2011.

USEPA, 2011h, *Air Data: Emissions by Category Report – Criteria Air Pollutants*. Searchable database (by geographic area, pollutant emitted, and year of data). Available at http://www.epa.gov/oar/data/emcatrep.html. Accessed August 16, 2011.

USEPA, 2011i, *2008 Highlights: Overview of the Acid Rain Program*. Available at http://www.epa.gov/airmarkets/progress/ARP_4.html. Accessed August 17, 2011.

USEPA, 2011j, *Cross-State Air Pollution Rule (CSAPR).* Available at http://www.epa.gov/crossstaterule/. Accessed on August 17, 2011.

USEPA, 2011k, *Regional Planning Organizations*. Available at http://www.epa.gov/visibility/regional.html. Accessed on August 17, 2011.

USEPA, 2011l, *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2009*, EPA 430-R-11-005, April 15. Available at http://www.epa.gov/climatechange/emissions/downloads11/US-GHG-Inventory-2011-Complete_Report.pdf. Accessed August 31, 2011.

USFWS (United States Fish and Wildlife Service), 1999, *South Florida Multi-Species Recovery Plan*. U.S. Fish and Wildlife Service, Atlanta, GA.

USFWS, 2004, *Effects of Oil Spills on Wildlife and Habitat*, U.S. Fish and Wildlife Service, Alaska Region, Dec. Available at http://alaska.fws.gov/media/unalaska/Oil%20Spill%20Fact%20Sheet.pdf. Accessed March 12, 2011.

USFWS, 2008, "Endangered and Threatened Wildlife and Plants; Determination of Threatened Status for the Polar Bear (*Ursus maritimus*) Throughout Its Range," *Federal Register* 73(95):28212–28303.

USGS (U.S. Geological Survey), undated, *North Pacific Pelagic Seabird Database (NPPSD)*. Alaska Science Center, Anchorage, AK.

USGS, 1970, *Earthquake Information Bulletin (Alaska)*, Vol.2 (2): March–April.

USGS, 1999, *Alaska Seismic Hazard Maps — 1999, Peak Horizontal Acceleration (%g) with 10% Probability of Exceedance in 50 Years*, interactive map. Available at http://gldims.cr.usgs.gov/akshmp/viewer.htm. Accessed June 6, 2011.

USGS, 2010, *Glossary of Terms on EQ Maps, Magnitude*. Available at http://earthquake.usgs.gov/earthquakes/glossary.php#magnitude. Accessed August 8, 2010.

USGS, 2011a, *National Earthquake Information Center (NEIC) — Earthquake Hazards Program, Circular Area Earthquake Search, Geographic Grid Search (Latitude 58.811N to 56.507N; Longitude 150.957W to 156.832W)*. Available at http://earthquake.usgs.gov/earthquakes/eqarchives/epic/epic_circ.php. Accessed June 6, 2011.

USGS, 2011b, *Alaska Volcano History*, volcano information, interactive map, Alaska Volcano Observatory, Anchorage, Alaska. Available at http://avo.alaska.edu/map/. Accessed March 3, 2011.

USGS, 2011c, *The Gulf of Mexico Hypoxic Zone*. Available at http://toxics.usgs.gov/hypoxia/hypoxic_zone.html. Accessed Aug. 4, 2011.

USGS, 2011d, *Alaska Earthquake History*. Available at http://earthquake.usgs.gov/earthquakes/states/alaska/history.php. Accessed on August 31, 2011.

Valkenburg, P., and J.L. Davis, 1984, "The Reaction of Caribou to Aircraft: A Comparison of Two Herds," pp. 7−9 in *Caribou and Human Activity, Proceedings of the 1st North American Caribou Workshop, Whitehorse, Yukon Territories*, A.M. Martell and D.E. Russell (eds.), Sept. 28−29, 1983, Canadian Wildlife Service, Special Publication, Ottawa, Ontario, Canada.

Van Pelt, T.I., and J.F. Piatt, 2003, *Population Status of Kittlitz's and Marbled Murrelets and Surveys for Other Marine Bird and Mammals Species in the Kenai Fjords Area, Alaska*. USGS Science Support Project, Species at Risk Annual Report for U.S. Fish and Wildlife Service, USGS Alaska Science Center, Anchorage, AK.

Vanderlaan, A.S.M., and C.T. Taggart, 2007, "Vessel Collisions with Whales: The Probability of Lethal Injury Based on Vessel Speed," *Marine Mammal Science* 23(1):144–156.

Vargo, S., P. Lutz, D. Odell, E. Van Vleet, and G. Bossart, 1986, *Study of the Effects of Oil on Marine Turtles, Final Report*, OCS Study MMS 86-0070, MMS, Atlantic OCS Region.

Vasconcelos, R.O., M.C.P. Amorim, and F. Ladich, 2007, "Effects of Ship Noise on the Detectability of Communication Signals in the Lusitanian Toadfish," *Journal of Experimental Biology* 210:2104–2112.

Veil, J.A., T.A. Kimmell, and A.C. Rechner, 2005, *Characteristics of Produced Water Discharged to the Gulf of Mexico Hypoxic Zone*, ANL/EAD/05-3, Argonne National Laboratory, Argonne, Ill., Aug. Available at http://www.osti.gov/bridge. Accessed September 2005.

VesselTrax, 2007, *Crude Oil Imports into U.S. Gulf Coast Ports*. Available at http://vesseltrax.com/crude_oil_imports.html. Accessed July 19, 2011.

Viereck, L.A., C.T. Dyrness, A.R. Batten, and K.J. Wenzlick, 1992, *The Alaska Vegetation Classification*, General Technical Report PNW-GTR-286, USDOA, Pacific Northwest Research Station.

Vukovich, F.M., 2007, "Climatology of Ocean Features in the Gulf of Mexico Using Satellite Remote Sensing Data," *Journal of Physical Oceanography* 37(3):689–707.

Wald, D.J., B.C. Worden, V. Quitoriano, and K.L. Pankow, 2005, *Shake Map Manual — Technical Manual, Users Guide, and Software Guide*, Version 1.0, June 19.

Wald, M.L., 2010, "Offshore Wind Power Line Wins Backing," *New York Times* October 12. Available at http://www.nytimes.com/2010/10/12/science/earth/12wind.html?ref=business. Accessed August 20, 2011.

Walker, D.A., and K.R. Everett, 1987, "Road Dust and Its Environmental Impact on Alaskan Taiga and Tundra," *Arc. Alpine Res.* 19:479–489.

Walker, D.A., D. Cate, J. Brown, and C. Racine, 1987a, *Disturbance and Recovery of Arctic Alaskan Tundra Terrain: A Review of Recent Investigations*, CRREL Report 87-11, U.S. Army Corps of Engineers, CRREL, Hanover, N.H.

Walker, D.A., P.J. Webber, E.F. Binnian, K.R. Everett, N.D. Lederer, E.A. Nordstrand, and M.D. Walker, 1987b, "Cumulative Impacts of Oil Fields on Northern Alaska Landscapes," *Science* 238: 757–761.

Walther, G., E. Post, P. Convey, A. Menzel, C. Parmesan, T.J.C. Beebee, J. Fromentin, O. Hoegh-Guldberg, and F. Bairlein, 2002, "Ecological Responses to Recent Climate Change," *Nature* 416:389–395.

Wang, G., and P.T. Pedersen, 2007, "A Literature Review of Risk Assessment of Ship-FPSO Collisions," OMAE 2007-29760, *Proceedings of OMAE2007, The 26th Offshore Mechanics and Arctic Engineering Conference*, Offshore Mechanics and Arctic Engineering, San Diego, Calif., June 10–15, 2007.

Wang, J., R. Kwok, F.J. Saucier, J. Hutchings, M. Ikeda, I.W. Hibler, J. Haapala, M.D. Coon, H.E.M. Meir, H. Eicken, N. Tanaka, R.T. Prentki, and W. Johnson, 2003, "Working Toward Improved Small-Scale Sea Ice-Ocean Modeling in the Arctic Seas," *EOS* 84(34), 325, 329–330.

Wang, J.L., V. Vivatrat , and J.R. Rusher, 1982, "Geotechnical Properties of Alaska OCS Silts," *Proceedings of 14th Offshore Technology Conference*, Houston, Texas, Vol. 4, OTC Paper 4412.

Ward, D.H., and R.A. Stein, 1989, *Response of Brant and Other Geese to Aircraft Disturbance at Izembek Lagoon, Alaska*. U.S. Fish and Wildlife Service Anchorage, AK.

Ward, D.H., R.A. Stein, and D.V. Derksen, 1994, "Response of Staging Brant to Disturbance at the Izembek Lagoon, Alaska," *Wildlife Society Bulletin* 22: 220–228.

Waring, G.T., E. Josephson, K. Maze-Foley, and P.E. Rosel (eds.), 2010, *U.S. Atlantic and Gulf of Mexico Marine Mammal Stock Assessments — 2010*, NOAA Tech Memo NMFS-NE 213, National Oceanic and Atmospheric Administration, National Marine Fisheries Service, Northeast Fisheries Science Center, Dec. Available at http://www.nefsc.noaa.gov/publications/tm/tm219. Accessed July 29, 2011.

Watkins, W.A., and W.E. Schevill, 1975, "Sperm Whales React to Pingers," *Deep Sea Research* 22:123-129.

Waythomas, C.F., and R.B. Waitt, 1998, *Preliminary Volcano-Hazard Assessment for Augustine Volcano, Alaska*, U.S. Geological Survey Open File Report 98-0106.

Waythomas, C.F., J.M. Dorava, T.P. Miller, C.A. Neal, and R.G. McGimsey, 1997, *Preliminary Volcano-Hazard Assessment for Redoubt Volcano, Alaska*, U.S. Geological Survey Open File Report 97-0857.

Weber, D.D., D.J. Maynard, W.D. Gronlund, and V. Konchin, 1981, "Avoidance Reactions of Migrating Adult Salmon to Petroleum Hydrocarbons," *Canadian Journal of Fisheries and Aquatic Sciences* 38:779–781.

Weeks, W.F., and G. Weller, 1984, "Offshore Oil in the Alaskan Arctic," *Science* 225(4660):371–378.

Weilgart, L.S., 2007, "A Brief Review of Known Effects of Noise on Marine Mammals," *International Journal of Comparative Psychology* 20:159–168.

Weingartner, T., 2003, "Physical Oceanography of the Beaufort Sea: An Overview," in *Physical Oceanography of the Beaufort Sea-Workshop Proceedings*, T. Weingartner (ed.), OCS Study MMS 2003-045, Anchorage, Alaska.

Weingartner, T., K. Aagaard, R. Woodgate, S. Danielson, Y. Sasaki, and D. Cavalieri, 2005, "Circulation on the North Central Chukchi Sea Shelf," *Deep-Sea Research Part II: Topical Studies in Oceanography* 52(24-26):3150–3174.

Weingartner, T.J., and S.R. Okkonen, 2001, *Beaufort Sea Nearshore Under-Ice Currents: Science, Analysis, and Logistics*, OCS Study MMS 2001-068, Institute of Marine Science, University of Alaska Fairbanks, Fairbanks, Alaska.

Weingartner, T.J., D.J. Cavalieri, K. Aagaard, and Y. Sasaki, 1998, "Circulation, Dense Water Formation, and Outflow on the Northeast Chukchi Shelf," *Journal of Geophysical Research* 103(C4):7647–7661.

Weingartner, T.J., R.S. Pickart, and M.A. Johnson, 2010, *Recommended Physical Oceanographic Studies in the Alaskan Beaufort Sea*, OCS Study MMS-2010-018, Anchorage, Alaska.

Weingartner, T.J., S.L. Danielson, J.L. Kasper, and S.R. Okkonen, 2009, *Circulation and Water Property Variations in the Nearshore Alaskan Beaufort Sea (1999-2007)*, OCS Study MMS 2009-035, MMS, Fairbanks, Alaska.

Wells, P.G., 1989, *Using Oil Spill Dispersants on the Sea – Issues and Answers*, Workshop on Technical Specifications for Oil and Dispersants Toxicity, January 17-19, 1989, New Orleans, La., Minerals Management Service, Gulf of Mexico OCS Region, New Orleans, La.

Wells, P.G., 1989, "Using Oil Spill Dispersants on the Sea – Issues and Answers," in *Oil and Dispersant Toxicity Testing, Proceedings of a Workshop on Technical Specifications*, T.W. Duke and G. Petrazzuolo (eds.), held in New Orleans, January 17–19, 1989.

Wesson, R.L., O.S. Boyd, C.S. Mueller, C.G. Bufe, A.D.Frankel, and M.D. Peterson, 2007, *Revision of Time-Dependent Probabilistic Seismic Hazard Maps for Alaska*, U.S Geological Survey Open File Report 2007-1043.

Wheeler, N.J.M., S.B. Reid, K.J. Craig, J.R. Zielonka, D.R. Stauffer, and S.R Hanna, 2008, *Cumulative Increment Analysis for the Breton National Wilderness Area*, OCS Study MMS 2008-058, prepared by Sonoma Technology, Inc., Petaluma, Calif., for MMS, Gulf of Mexico OCS Region, New Orleans, La., Dec.

Whitmeyer, S.J., and D.M. FitzGerald, 2008, "Episodic Dynamics of a Sand Wave Field," *Marine Geology* 252:24–37.

Whitney, J., 1994, *Shoreline Countermeasures Manual*, NOAA, Hazardous Materials Response & Assessment Division, March.

Whitney, J., 2000, "What Actual Movement of Oil in Cook Inlet Tells Us about the Circulation in Cook Inlet," in *Cook Inlet Oceanography Workshop*, S.R. Johnson, M.A. Okkonen (eds.), November 9, Kenai, Alaska, pp. 25–47, Institute of Marine Science, University of Alaska, Fairbanks, Alaska.

Whitney, J.H., et al., 1979, *Lower Cook Inlet, Alaska: Do Those Large Sand Waves Migrate?*, presented at Offshore Technology Conference, Houston, Texas, April 30–May 7.

Whitney, J.W., and D.K. Thurston, 1977, "Geologic Constraints for Petroleum Development of the Lower Cook Inlet, Alaska, Outer Continental Shelf Lease Area," in *The U.S. Geological Survey in Alaska: Accomplishments during 1979*, U.S. Geological Survey Circular 823-B, N.R.D. Albert and T. Hudson (eds).

Whitney, J.W., and D.K. Thurston, 1981, "Geologic Constraints for Petroleum Development of the Lower Cook Inlet, Alaska, Outer Continental Shelf Lease Area," in *The United States Geological Survey in Alaska: Accomplishments during 1979*, N.R.D. Albert and T. Hudson (eds.), U.S. Geological Survey Circular 823-B.

Whitney, J., 1994, *Shoreline Countermeasures Manual*, U.S. Department of Commerce/National Oceanic and Atmospheric Administration, Hazardous Materials Response & Assessment Division, March.

Wicker, K.M., R.E. Emmer, D. Roberts, and J. van Beek, 1989, *Pipelines, Navigation Channels, and Facilities in Sensitive Coastal Habitats, An Analysis of Outer Continental Shelf Impacts, Coastal Gulf of Mexico, Volume I: Technical Narrative*, OCS Report MMS 89-0051, MMS, Gulf of Mexico OCS Region, New Orleans, La.

Wiedmer, M., M.J. Fink, J.J. Stegeman, R. Smolowitz, G.D. Marty, and D.E. Hinton, 1996, "Cytochrome P-450 Induction and Histopathology in Preemergent Pink Salmon from Oiled Spawning Sites in Prince William Sound," *American Fisheries Society Symposium* 18:509–517.

Wijesekera, H.W., D.W. Wang, W.J. Teague, and E. Jarosz, 2010, "High Sea-Floor Stress Induced by Extreme Hurricane Waves," *Geophysical Research Letters* 37:L11604.

Wilhelm, O., and M. Ewing, 1972, "Geology and History of the Gulf of Mexico," *Geological Society of American Bulletin* 83:575–600.

Wilkinson, T., E. Wiken, J.B. Creel, T.F. Hourigan, T. Agardy, H. Herrmann, L. Janishevski, C. Madden, L. Morgan, and M. Padilla, 2009, *Marine Ecoregions of North America*, Commission for Environmental Cooperation, Montreal, Canada.

Wilson, D., R. Billings, R. Oommen, B. Lange, J. Marik, S. McClutchey, and H. Perez, 2010, *Year 2008 Gulfwide Emission Inventory Study*, OCS Study BOEMRE 2010-045, BOEMRE, Gulf of Mexico OCS Region, New Orleans, La., Dec.

Wilson, D.L., J.N. Fanjoy, and R.S. Billings, 2004, *Gulfwide Emission Inventory Study for the Regional Haze and Ozone Modeling Efforts, Final Report*, OCS Study MMS 2004-072, prepared by Eastern Research Group, Inc., Morrisville, N.C., for the MMS, Gulf of Mexico OCS Region, New Orleans, La., Oct.

Wilson, S., 2007, "USEPA's Produced Water Permitting Requirements," pp. 32–33 in *Exploration & Production: The Oil and Gas Review 2007*, Offshore Technology Conference (OTC) Edition, April.

Wilson, C.A., A. Pierce, and M.W. Miller, 2003, *Rigs and Reefs: A Comparison of the Fish Communities at Two Artificial Reefs, a Production Platform, and a Natural Reef in the Northern Gulf of Mexico*, OCS Study MMS 2003-009, prepared by the Coastal Fisheries Institute, School of the Coast and Environment, Louisiana State University, for MMS, Gulf of Mexico OCS Region, New Orleans, La.

Witherington B.E., 1994, "Some 'Lost-Year' Turtles Found," in *Proceedings of theThirteenth Annual Symposium on Sea Turtle Biology and Conservation*, B.A. Schroeder and B.E. Witherington (comps), NOAA Tech Memo NMFS-SEFSC-341.

Witherington, B.E., and R.E. Martin, 1996, *Understanding, Assessing, and Resolving Light-Pollution on Sea Turtle Nesting Beaches*, FMRI Technical Report TR-2, Florida Department of Environmental Protection.

Woodgate, R.A., K. Aagaard, and T.J. Weingartner, 2005, "A Year in the Physical Oceanography of the Chukchi Sea: Moored Measurements from Autumn 1990-1991," *Deep Sea Research Part II: Topical Studies in Oceanography* 52(24-26):3116–3149.

Woodward-Clyde Consultants, 1996, *The 1995 Northstar Unit Sampling Program, Final Report*, prepared for BP Exploration (Alaska) Inc., Anchorage, Alaska.

Wooley, C., S. Hillman, and D. O'Brien, 1997, "Mapping Cultural Resource Sites for the Prince William Sound Graphical Resource Database," *Proceedings of the 20th Arctic and Marine Pollution (AMOP) Technical Seminar*, Vancouver, B.C.

Word, J., M. Pinza, and W. Gardiner, 2008, *Literature Review of the Effects of Dispersed Oil with Emphasis on Cold Water Environments of the Beaufort and Chukchi Seas*, prepared for Shell Global Solutions, Houston, Texas, and American Petroleum Institute, Washington D.C.

Wright, A.J., N.A. Soto, A.L. Baldwin, M. Bateson, C.M. Beale, C. Clark, T. Deak, E.F. Edwards, A. Fernandez, A. Godinho, L.T. Hatch, A. Kakuschke, D. Lusseau, D. Martineau, L.M. Romero, L.S. Weilgart, B.A. Wintle, G. Notarbartolo-di-Sciara, and V. Martin, 2007, "Do Marine Mammals Experience Stress Related to Anthropogenic Noise?" *International Journal of Comparative Psychology* 20:274–316.

Würsig, B., 1990, "Cetaceans and Oil: Ecologic Perspectives," pp. 129–165 in *Sea Mammals and Oil: Confronting the Risks*, J.R. Geraci and D.J. St. Aubin (eds.), Academic Press, San Diego, Calif.

Würsig, B., T.A. Jefferson, and D.J. Schmidly, 2000, *The Marine Mammals of the Gulf of Mexico*, Texas A&M University Press, College Station, Texas.

Yamamoto-Kawai, M., F.A. McLaughlin, E.C. Carmack, S. Nishino, K. Shimada, and N. Kurita, 2009, "Surface Freshening of the Canada Basin, 2003-2007: River Runoff versus Sea Ice Meltwater," *Journal of Geophysical Research* 114:C00A05.

Yanez-Arancibia, S., and J. Day, 2004, "Environmental Sub-regions in the Gulf of Mexico Coastal Zone: The Ecosystem Approach as an Integrated Management Tool," *Ocean and Coastal Management* 47(11-12): 727–757.

Yarwood, G., G. Mansell, M. Jimenez, and S. Lau, 2004, *2000 Gulf-Wide Emissions Inventory – OCS On-Shore Impacts Modeling (Texas), A Preliminary Look*, prepared by ENVIRON International Corporation, Novato, Calif., for MMS, New Orleans, La. Sept. 1.

Zavala-Hidalgo, J., S.L. Morey, and J.J. O'Brien, 2003, "Seasonal Circulation on the Western Shelf of the Gulf of Mexico Using a High-Resolution Numerical Model," *Journal of Geophysical Research* 108(C12):3389.