

To: Christopher Putnam[christopher_putnam@fws.gov]
From: Klein, Kimberly
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Subject: Outline and Approach to analysis
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[Assessment approach 6June2018.docx](#)
[Outline ITR-18-01_6June2018.docx](#)

Christopher, the 1002 ITR outline and assessment approach is included. The assessment approach is intended to be a internal document for the administrative record and for guidance for the team.

Thanks for taking a look.

Kimberly Klein
Incidental Take Coordinator
US Fish and Wildlife Service
907-786-3621
Kimberly_Klein@fws.gov

Draft OUTLINE OF THE PROPOSED ITR FOR TAKE OF POLAR BEARS IN THE ARCTIC NATIONAL WILDLIFE REFUGE

Terminology (common language to be used throughout the document)

Acronyms and Abbreviations: if you insert one, look back to make sure it hasn't already been defined and add a comment to remind others to use it in the future.

Shortened Terms:

- the Refuge - 1002 Area of the Arctic National Wildlife Refuge
- the 1002 Area - 1002 Area of the Arctic National Wildlife Refuge
- the Service or we - the U.S. Fish and Wildlife Service
- SAE or the applicant – SAEExploration Inc.
- polar bears or bears - polar bears
- the proposed project or the proposed activity (used interchangeably) – the specified activity; seismic exploration and activities associated with seismic work, as proposed to be conducted by SAE.
- The proposed regulations - the issuance of ITRs which would allow legal take
- the population or the stock (used interchangeably)- the Southern Beaufort Sea population of polar bears.
- [Add others here...]

1. Background

2. Summary of Request - FORREST

3. Description of Specified Activities and Geographic Area - FORREST

Briefly describe seismic work in general and reference the ITR application

4. Description of Marine Mammals in the Specified Area

- A. *Brief discussion of status and stressors,*
 - B. *how bears use the area, seasonal mvmts, behaviors*
 - C. *Enough info to provide context for the analysis*
- A note on inclusion by reference: ICB is available for information that is necessary to understand or comply with the regulations this proposal will put forth. That is, if a document section, in its entirety, is necessary for understanding the analysis in this document it, it seems it would be eligible, although ICB is normally geared toward standards for compliance. We must seek approval from OMB for IBR.*

5. Potential Effects of the Activities

A. Denning bears -RYAN

1. Exposure of Dens to Activities

(this section discusses the timing, intensity, and duration of project activities to identify how bears will perceive project activities in terms of the likely exposure)

- a. *Number of dens*
- b. *Regions of overlap with activity*

c. *Types of exposures, likelihood and degree*

- (1) VEHICLE TRAVEL, NOISE, EMISSIONS,
- (2) VESSEL TRAFFIC
- (3) PHYSICAL OBSTRUCTIONS
- (4) HUMAN ENCOUNTERS

d. *Degree of exposure after any mitigation reducing the likelihood or amount of exposure*

2. Response to Activities

- e. *Direct and Indirect Effects*
- f. *Evidence from Studies*
- g. *Net effect to the animal, after effective mitigation reducing duration, intensity or likelihood of response*
- h. *Potential influence on stock*

B. *Other Bears (Sea ice/denning transit (n/s), Coastal transit E/W, Resting, Sea ice/feeding) - KIM*

1. Exposure of Polar Bears to Activities

- i. *Number of bears*
- j. *Regions of overlap with activities*
- k. *Types of exposures. Likelihood and degree*

- (5) VEHICLE TRAVEL, NOISE, EMISSIONS,
- (6) VESSEL TRAFFIC
- (7) PHYSICAL OBSTRUCTIONS

- (1) NO DISTURBANCE ZONES
- (2) CHANGES IN ACCESS TO PREY

- (8) HUMAN ENCOUNTERS

l. *Degree of exposure after any mitigation reducing the likelihood or amount of exposure*

2. Response to Activities

- m. *Direct and Indirect Effects*
- n. *Evidence from Studies*
- o. *Net effect to the animal, after any mitigation reducing degree or extent of response*
- p. *Possible impact to the stock*

C. *Exposure to contaminants/spills*

- 1. Sources of contaminants
- 2. Effects on polar bears
- 3. Likelihood of spills (note efforts to reduce contaminants, refer to Mitigation/Monitoring/Reporting section)
- 4. Likelihood of impacts to bears

Commented [KKK1]: do we want to include this section or just cross reference to other evaluations of effects on pbs-esa, etc.

6. Mitigation and Monitoring

DRAFT

- A. Refer to the Proposed Authorization section below*
- B. Describe other mit measures considered, but not found effective or practicable*

7. Estimated Incidental Take

- A. Characterize Take by Level B Harassment*
- B. Estimate Exposure Rates*
- C. Predict Behavioral Response Rates*
- D. Calculate Take*
- E. State Critical Assumptions*

8. Potential Impacts on the Stock

- A. Likely effects from this project; conclusions from*
- B. Likely effects on the population together with other authorizations*

9. Potential Impacts on Subsistence Uses

- A. Subsistence use of polar bears in the Refuge*
- B. Expected effects of the project on subsistence harvest*
- C. Mitigation measures, specific to subsistence*
- D. Net effect on subsistence*

10. Findings

- A. Small Numbers*
- B. Negligible impact*
- C. No unmitigable adverse impact to subsistence*

11. Required Determinations

- A. National Environmental Policy Act (NEPA)*
- B. Endangered Species Act*
- C. Government-to-Government Coordination*

12. Proposed Authorization

- A. General Conditions for Issuance of the Proposed IHA*
- B. Avoidance and Minimization (refer from SB ITRs)*
- C. Monitoring*
- D. Measures to Reduce Impacts to Subsistence Users*
- E. Reporting Requirements*

13. Request for Public Comments