



THE WILDLIFE SOCIETY

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NPR-A IAP/EIS Comments
AECOM Project Office
1835 South Bragaw Street, Suite 490
Anchorage, AK 99508

Dear Sir or Madam:

The Wildlife Society thanks you for the opportunity to provide comments on the Integrated Activity Plan and Environmental Impact Statement (IAP/EIS) for the National Petroleum Reserve-Alaska (NPR-A), as described in the Notice of Availability published March 30, 2012.

Founded in 1937, The Wildlife Society is a non-profit scientific and educational association of nearly 11,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and habitats worldwide.

The NPR-A is composed of more than 22 million acres of public land that provide vital calving grounds for two of Alaska's largest caribou herds; habitat for large concentrations of marine mammals including beluga whales, polar bears, spotted seal, and walrus; and supports millions of breeding migratory birds, globally significant densities of raptors, and healthy populations of important predators such as grizzly bears, wolves, and wolverines. In 1976, Congress recognized the extraordinary natural values of this area, mandating that any future energy development in the NPR-A be balanced with “maximum protection” of the area’s exceptional fish and wildlife.

Pursuant to this requirement, development of petroleum resources in the NPR-A must be implemented carefully to avoid or minimize potentially irreparable damage to unique and easily disrupted ecosystems. After reviewing the Draft IAP/EIS, we recommend that the Bureau of Land Management (BLM) implement Alternative B to achieve this balance.

SUPPORT FOR ALTERNATIVE B

1. Increased Protection of Four Special Areas

In our October 2010 scoping comments, The Wildlife Society recommended that “maximum protection” be provided to four Special Areas in the NPR-A due to their ecologically important roles. Alternative B would enlarge three of these areas, and expand the purpose of the fourth.

Teshkepuk Lake Special Area. Teshkepuk Lake lies at the heart of one of the most productive and sensitive wetland ecosystems in the circumpolar Arctic. Wetlands north and east of Teshkepuk Lake support up to 30 percent of the entire Pacific brant population, along with greater white-fronted geese, Canada geese, and lesser snow geese during the flightless molt period. The area has been recognized as an Important Bird Area (IBA) of international significance. The Teshkepuk Lake caribou herd is a subsistence resource, providing most of the caribou harvested by North Slope communities. Telemetry data have documented that over 90% of pregnant cows calve in the area south, east, and north of Teshkepuk Lake. There is a narrow corridor of land between the east side of Teshkepuk Lake and the Kogru Inlet through which nearly all of the maternal cows must travel through shortly before or after calving to get to insect relief areas. In most years, more than 75 percent of the herd uses the area around and north of Teshkepuk Lake for relief during the height of the insect season. This Special Area would benefit from enhanced protection under Alternative B through the addition of 2 million acres, whereas all other alternatives would allow leasing and development in this extremely sensitive area.

Colville River Special Area. The Colville River is the largest river draining the Arctic Slope of the Brooks Range, and one of the most important raptor nesting areas in the world. The Colville River Special Area was established to protect raptor and passerine nesting habitats and important foraging areas for moose, grizzly bears, and wolves. The river provides numerous cliff-nesting sites for raptors and a mosaic of habitats that support abundant mammalian and avian prey for raptors. As a result, the drainage contains a density and diversity of nesting raptors unique within the Nearctic, including high densities of nesting peregrine falcons, gyrfalcons, rough-legged hawks, and golden eagles. Alternative B would expand buffers along the Colville River, and modifies this Special Area's purpose to protect all raptors, not just arctic peregrine falcons.

Kasegaluk Lagoon Special Area. Kasegaluk Lagoon provides a unique barrier island ecosystem located along the northwestern coast of the NPR-A. Up to 3,500 beluga whales gather to feed and bear their young in the Lagoon, an area also important for spotted seals as a haulout area. Kasegaluk Lagoon is also an important feeding area for both polar bears and grizzly bears, and an important fall migration habitat for Pacific black brant. Alternative B would expand this Special Area southward to offer additional protection to waterbird and shorebird breeding, molting, staging, and migration habitats.

Utukok Uplands Special Area. The Utukok River Uplands in the southwestern part of the NPR-A contains the heart of the calving area of the 400,000-animal Western Arctic caribou herd, the largest caribou herd in Alaska. Approximately 15,000 caribou are harvested each year for food by approximately forty villages in Western Alaska. This upland area also provides important habitat for wolves and grizzly bears, and supports an unusually high density of wolverines. The addition of 3.1 million acres to this area under Alternative B would more fully protect prime calving and insect-relief habitat within the NPR-A.

2. Protection of Additional Biologically-Valuable Areas

In our scoping comments, The Wildlife Society also recommended that the final plan designate three new Special Areas. Of the four alternatives provided in the IAP/EIS, Alternative B would provide the most protection to these three ecologically vital areas.

Peard Bay Special Area. Peard Bay and adjacent wetlands provide high-density shorebird and waterfowl habitat as well as denning for polar bears. Alternative C would create a Special Area here, but only protect 107,000 acres. Alternative B, however, would designate 1.6 million acres as Peard Bay Special Area, which would be unavailable for leasing in order to protect marine mammals and habitat for waterbird and shorebird breeding, molting, staging, and migration.

Dease Inlet-Meade River. The area surrounding Dease Inlet and Meade River provides important wetland habitat for waterfowl, loons, and shorebirds. Alternative B would protect marine habitat and shorelines around Dease Inlet by making these lands unavailable for leasing.

Ikpikpuk River. This river and adjacent wetlands provide exceptional values for fish and wildlife and a high-density nesting area for Peregrine falcons. Only under Alternative B would buffers be expanded along Ikpikpuk River.

The 11.8 million acres designated as unavailable for lease under Alternative B would reliably protect the concentrated calving and insect relief areas of the Western Arctic caribou herd, as well as important waterfowl and shorebird habitat, subsistence use areas, the great majority of polar bear denning habitat in the NPR-A, and the overall wilderness characteristics of these lands. Alternative B would allow an appropriate balance of responsible energy development with the need to protect the extraordinary ecological values provided by the NPR-A. This balance is especially important given the large scale of energy-related development elsewhere on the Alaskan coastal plain of the Beaufort Sea.

Thank you for considering the views of wildlife professionals.

Sincerely,



Paul R. Krausman, CWB®
President