THE WILDLIFE SOCIETY
5410 Grosvenor Lane • Bethesda, MD 20814-2144
Tel: (301) 897-9770 • Fax: (301) 530-2471
E-mail: tws@wildlife.org

October 1, 2010

NPR-A Planning Team
Bureau of Land Management, Alaska State Office
222 West 7th Avenue
Anchorage, AK 99513-7599

RE: Notice of Intent to Prepare the National Petroleum Reserve-Alaska Area-wide Integrated Activity Plan/Environmental Impact Statement

Dear Planning Team:

The Wildlife Society thanks you for the opportunity to provide scoping comments on the Integrated Activity Plan and Environmental Impact Statement for the National Petroleum Reserve-Alaska (NPR-A), as described in the Notice of Intent published July 28, 2010.

The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association of over 9,100 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 its habitats worldwide.

As the Bureau of Land Management (BLM) prepares the new comprehensive Plan for the entire 22.1-million-acre NPR-A, we urge you to take this critical opportunity to balance future development in America's Arctic with conservation measures to safeguard the outstanding wildlife and habitat in the region. Untapped petroleum resources of the Arctic regions could contribute to the world's diminishing energy supplies. However, an inadequate understanding of or disregard for polar and boreal ecosystems could lead activities associated with development of a northern petroleum industry to cause severe environmental damage. Polar and boreal ecosystems are profoundly susceptible to disturbance because their biological diversity and net biological productivity are low. Climate change is placing additional stress on these systems. Natural recovery following disturbance is extremely slow in most northern soil-plant systems. Furthermore, animals that reside in colonies or congregate seasonally in small areas in ecosystems of the far north could be stressed not only from degradation of their habitats but also from accelerated human disturbance. Thus, development of a petroleum industry in arctic and subarctic regions must be implemented carefully to avoid or minimize rapid and perhaps irreparable damage to unique and easily disrupted ecosystems.

NPR-A is home to two of Alaska's largest caribou herds, millions of migratory birds, globally significant densities of raptors, and large concentrations of marine mammals (including beluga

whales, polar bears, spotted seal, and walrus). In 1976, Congress recognized the extraordinary natural values of the NPR-A and transferred its management to the Department of the Interior, mandating that "any exploration within the Utukok River, the Teshekpuk Lake areas and other areas designated by the Secretary containing any significant subsistence, recreational, fish and wildlife, or historical or scenic value shall be conducted in a manner which will assure the maximum protection" of such surface values.

We recommend that the currently designated Special Areas receive the "maximum protection" as provided by law. These include:

Teshekpuk Lake Special Area - Teshekpuk Lake, the third largest lake in Alaska, lies at the heart of one of the most productive and sensitive wetland complexes in the circumpolar Arctic. Wetlands north and east of Teshekpuk Lake support tens of thousands of Pacific brant, greater white-fronted geese, Canada geese, and lesser snow geese during the flightless molt period. The area is unique and of international significance for North American and Russian populations of geese that are important to the nations of the United States, Canada, Mexico, Japan and Russia. The Teshekpuk Lake caribou herd is an important subsistence resource, providing most of the caribou harvested by the North Slope communities of Atqasuk, Barrow, Nuiqsut, and Wainwright. Telemetry data have documented that over 90% of pregnant cows calve in the area south, east, and north of Teshekpuk Lake. There is a narrow corridor of land between the east side of Teshekpuk 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% of the herd uses the area around and north of Teshekpuk Lake for relief during the insect season. We do recommend more a detailed study of the displacement potential for the Teshskpuk caribou herd in seasons other than summer, when most research has been conducted.

Colville River Special Area - The Colville River is the largest river, draining Alaska's North Slope, 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 Colville 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.

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.

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 supports an unusually high density of wolverines.

These Special Areas should not be subject to additional development. Additionally, the current restrictions on hard rock mining and coal development in the Reserve need to be maintained.

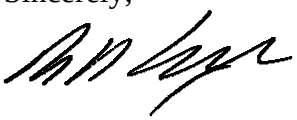
The new Plan should also recognize additional areas of exceptional biological value deserving of strong protection. BLM should consider the following for recognition as new Special Areas: 1) the Dease Inlet-Meade River area that provides important wetland habitat for waterfowl, loons, and shorebirds; 2) Peard Bay and adjacent wetlands that provide high-density shorebird and waterfowl habitat as well as denning for polar bears; and 3) the Ikpikpuk River and adjacent wetlands which have exceptional values for fish and wildlife and a high-density nesting area for Peregrine Falcons.

Approximately 3 million acres of land within NPR-A currently have active leases for oil and gas development. We urge that practical measures be taken to reduce or mitigate all environmental and biotic damage resulting from such development. Such measures should include: (a) establishment of strict environmental standards and surveillance for exploration and development of petroleum resources; (b) initiation of international planning for utilization of common petroleum resources and transportation corridors; (c) the use, where possible, of existing road and utility rights-of-way for pipelines; (d) the use of transport vehicles or structures that offer the maximum environmental protection against accidental oil spills; (e) avoidance of encroachments upon important wilderness and wildlife areas by development structures and associated access roads and support facilities; (f) consideration of wildlife movement corridors and critical foraging, breeding and wintering areas; and (g) proactive planning and implementation of post-development restoration and recovery of affected lands. Any development must be balanced with concern for key natural areas, wildlife habitat, subsistence use, recreation and scenic values.

Finally, the plan must also address the widespread impacts being caused by climate change, which is expected to be accentuated at high latitudes. Changes such as increasing Arctic temperatures, loss of sea ice, increased erosion, changes in precipitation, vegetation changes, and impacts on permafrost can reasonably be expected to place increasing stress upon Arctic ecosystems in a manner that could jeopardize various populations of wildlife as well as the continuing opportunities for subsistence harvest.

Thank you for considering the views of wildlife professionals.

Sincerely,



Bruce D. Leopold, Ph.D.
President