



THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

1 February 2018

Secretary Ryan Zinke
Department of Interior
1849 C Street, N.W.
Washington DC 20240

Dear Secretary Zinke:

We understand that the Bureau of Land Management (BLM) has been tasked with conducting a review of the Integrated Activity Plan (IAP) for the National Petroleum Reserve in Alaska (NPR-A). Hence, we are writing to offer our perspectives on how to balance energy development and wildlife values in this western Arctic reserve, the largest block of public land in our nation.

The Wildlife Society was founded in 1937 and is a non-profit professional society representing over 10,000 wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation. The Wildlife Society's [position on energy development](#) recognizes the key role it plays in our nation's economy and recommends development strategies that plan for minimal disturbance to wildlife and important wildlife habitats and monitoring to improve future recommendations.

As the BLM prepares to review the existing IAP for NPR-A, we strongly encourage the agency to recognize the importance of balancing future development in America's Arctic with conservation measures to safeguard the outstanding wildlife and habitat in the region. Arctic ecosystems are particularly susceptible to disturbance because their biological diversity and net biological productivity are low and climate change is placing additional stress on these systems. Wildlife populations that reside in colonies or congregate seasonally in small areas in ecosystems of the far north could be stressed or displaced, not only from degradation of their habitats, but also from accelerated human disturbance. Thus, development of a petroleum industry in arctic regions must be implemented carefully to avoid or minimize rapid and perhaps irreparable damage to these unique and easily disrupted ecosystems.

The NPR-A is home to two of Alaska's large 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. With passage of the Naval Petroleum Reserves Production Act of 1976, Congress transferred management of NPR-A to the Department of the Interior and recognized the extraordinary natural values of the NPR-A, mandating that "any exploration within the Utukok River and 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. The 1976 Act has guided energy development in NPR-A for more than 40 years, and it makes clear that management of NPR-A is not just a matter of maximizing energy production, but also sustaining the public's wildlife and their habitats.

The Wildlife Society recommends that the currently designated Special Areas within NPR-A receive the “maximum protection” as provided by law. These include:

Teshkepuk Lake Special Area - Teshkepuk Lake lies at the heart of one of the most productive and sensitive wetland complexes in the circumpolar Arctic. Wetlands north and east of Teshkepuk Lake support tens of thousands of brant, greater white-fronted geese, Canada geese, and lesser snow geese during the flightless molt period. Densities of nesting shorebirds south of the lake are among the highest documented anywhere on Alaska’s North Slope, and the area west of Teshkepuk Lake is of high importance for yellow-billed loons and tundra swans. The Teshkepuk Caribou Herd is an important subsistence resource, providing most of the caribou harvested by the North Slope communities of Atqasuk, Utqiagvik (formerly Barrow), Nuiqsut, and Wainwright. Telemetry data have documented that more than 90% of pregnant cows calve in the area south, east, and north of Teshkepuk Lake. There are two narrow corridors of land northwest and east of Teshkepuk Lake through which 75% or more of the bulls, cows and calves must travel one or more times in mid-summer to move between important insect relief and foraging areas.

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.

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 providing important haul out areas for spotted seals and walrus. Additionally, Kasegaluk Lagoon is an important feeding area for both polar bears and grizzly bears, as well as a fall migration area for brant.

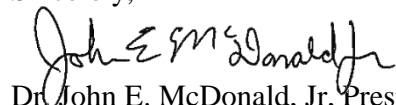
Utukok Uplands Special Area - The Utukok River Uplands in the southwestern part of the NPR-A contains the core of the calving area of the Western Arctic Caribou Herd, which at times has numbered nearly 500,000 animals. Approximately 15,000 caribou are harvested each year for food by about forty villages in northwestern Alaska. This upland area also provides important habitat for wolves, grizzly bears and an unusually high density of wolverines.

Peard Bay Special Area – Peard Bay and adjacent wetlands provide high-density habitats for nesting shorebirds and waterfowl as well as denning habitat for polar bears. The Peard Bay area is of high value for nesting spectacled eiders, which are listed under the ESA as a threatened species.

Under the current Integrated Activity Plan, there is now a robust program of oil exploration, development, and production in NPR-A. The Wildlife Society recommends that current limitations on petroleum development within these existing Special Areas be maintained to ensure maximum protection for key natural areas, wildlife habitat, subsistence use, recreation (including hunting and fishing) and scenic values.

Thank you for considering the views of wildlife professionals.

Sincerely,



Dr. John E. McDonald, Jr., President

Cc: BLM Acting Director, BLM Alaska Acting State Director, USFWS Alaska Regional Director, Alaska Dept. of Fish & Game Commissioner