

United States Senate

WASHINGTON, DC 20510

February 20, 2020

The Honorable David Bernhardt
Secretary of the Interior
U.S. Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Dear Secretary Bernhardt:

We write to express serious concerns with the Bureau of Land Management's decision to rewrite the Integrated Activity Plan (IAP) for the National Petroleum Reserve-Alaska (Reserve), especially in light of the troubling pro-development direction of the recently released Draft Environmental Impact Statement (EIS) for the revised IAP.¹ The Reserve is one of the wildest remaining places in North America and sustains extraordinary fish and wildlife populations. Revising the IAP is unnecessary and threatens to sacrifice the Reserve as part of a larger push by the Trump administration to recklessly sell off America's Arctic for oil and gas development without any regard for how it will harm the people who live in and near the Reserve, our climate, and the fish and wildlife that depend on the Arctic's special places.

The current management plan was created through a robust public process and scientific consensus and considered the interests of a variety of key stakeholders who were involved through 17 public meetings, additional opportunities for public input, and tribal consultation. The process used to create the current IAP resulted in the designation of five Special Areas of unique and irreplaceable ecological value: Teshekpuk Lake, Colville River, Utukok River Uplands, Kasegaluk Lagoon, and Peard Bay, while allowing oil and gas development on 11.8 million acres, or more than half, of the Reserve. While not all areas in the Reserve worthy of protections received them, the current IAP is a thoughtful compromise that balances protection with development and the needs of local populations. Developing a new IAP that further prioritizes oil and gas development is unnecessary and ignores the serious impacts additional development will have on the climate, Alaska's indigenous populations, and fish and wildlife populations across this region.

Unlike the current IAP, which took a comprehensive approach to managing the unique ecological values found in the Reserve, this revision appears targeted largely at vastly expanding oil and gas development.² BLM's draft EIS proposes to completely eviscerate the Colville River Special Area, shrink the Teshekpuk Lake Special Area, and open additional areas in the Teshekpuk Lake Special Area and elsewhere to leasing as part of a large-scale giveaway of America's public lands. We are deeply concerned that the revision of the IAP will result in opening additional acres to oil and gas development and infrastructure and eliminating existing protections within these Special Areas.

¹ <https://www.blm.gov/planning-and-nepa/plans-in-development/alaska/npr-a-iap-eis>

² E. Harball, Interior official: 'millions' more acres in NPR-A to open for oil development, Alaska Public Media, August 9, 2018. <https://www.alaskapublic.org/2018/08/09/interior-official-millions-more-acres-in-npr-a-to-open-for-oil-development/>

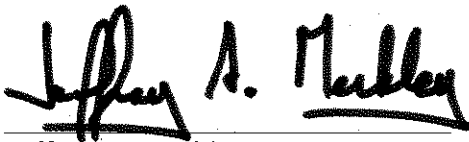
If any change is to be made to the existing IAP, BLM should increase protections for designated Special Areas, not reduce them further or open them to oil and gas. Not only are designated Special Areas intended to be managed for their unique ecological value, but when Congress authorized oil and gas leasing in the Reserve, it was mandated that activities ensure "maximum protection" of areas that have "significant subsistence, recreational, fish, and wildlife, or historical or scenic value."³ Threats to the Teshekpuk Lake Special Area would not only negatively impact the fragile and rapidly changing ecosystem, but also the Teshekpuk Caribou Herd, which is a vital subsistence resource for indigenous Alaskans.

As the largest contiguous unit of public land in the United States, the Reserve has extraordinary ecological and subsistence values. The Western Arctic and Teshekpuk Caribou Herds each rely upon distinct key habitats in the Reserve, and these caribou are a vital subsistence resource for over 40 indigenous communities in northern and western Alaska. Additionally, millions of migratory seabirds, shorebirds, waterfowl, and raptors rely on the Reserve for habitat throughout the year. Teshekpuk Lake, the largest Arctic lake in America, is so critical for these migratory birds that the lake and its surrounding wetlands are designated as globally-significant Important Bird Areas. The Reserve is a diverse ecosystem and many mammals such as wolves, grizzly bears, moose, and wolverine call this iconic landscape their home. Likewise, marine mammals such as polar bears, Pacific walrus, beluga whales, and spotted seals utilize its rich coastal and lagoon waters.

These Special Areas are already under direct threat from encroaching oil and gas development and the negative impacts of climate change that such development exacerbates. With the Arctic warming "faster than any other place on Earth," according to scientists at the U.S. Geological Survey, removing existing protections in this region is reckless and unwise.⁴ We urge BLM to maintain the strongest possible protections for Special Areas within the Reserve and not open additional acreage in the Reserve to oil and gas leasing.

Thank you for your attention to these comments.

Sincerely,




Jeffrey A. Merkley
U.S. Senator



Bernard Sanders
U.S. Senator

³ 42 U.S.C. § 6504

⁴ C. Marshall, *USGS scientists say Arctic is warming 'faster than any other place on Earth'*, E&E Publishing, August 3, 2015.



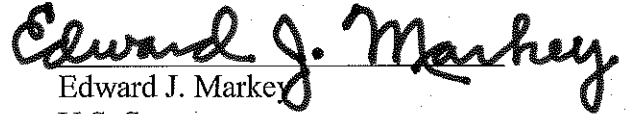
Kamala D. Harris
U.S. Senator



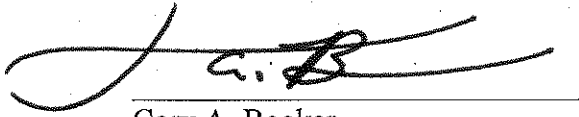
Chris Van Hollen
U.S. Senator



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U.S. Senator



Cory A. Booker
U.S. Senator