

September 16, 2024

Steven M. Cohn. Bureau of Land Management Alaska State Director,

Cc: Deb Haaland, Secretary of the Interior; Tracy Stone-Manning, Director of the Bureau of Land Management; Laura Daniel-Davis, Acting Deputy Secretary of the Interior; Steve Feldgus, Principal Deputy Assistant Secretary for Land and Minerals Management; Nada Culver, Principal Deputy Director of the Bureau of Land Management; Kate Kelly, Deputy Chief of Staff for Policy

Dear Mr. Cohn,

On behalf of the undersigned conservation organizations, we are responding to your request for feedback from the public [on the need to identify additional significant resource values for existing Special Areas; modify the boundaries or management of existing Special Areas; or identify public lands that may qualify for designation as new Special Areas in the National Petroleum Reserve in Alaska \(Western Arctic Reserve\).](#)

The Western Arctic Reserve is home to the nation's largest single unit of public land, spanning nearly 23 million acres. Vast and diverse, the Reserve contains vital habitats for wildlife like caribou, endangered polar bears, muskox, and millions of migratory birds. Unfortunately, the Arctic is warming at four times the rate of other regions and is particularly vulnerable to climate change—and threats from oil and gas development are growing.

The Biden Administration has already taken significant steps toward safeguarding public lands in the Western Arctic Reserve by updating regulations and protections for more than 13 million acres in the five existing designated Special Areas in the Reserve: Teshekpuk Lake, Utukok River Uplands, Colville River, Kasegaluk Lagoon, and Peard Bay. This action affirmed and strengthened previous administrations' recognition of areas that must be protected to safeguard the lands, waters, and wildlife of the region.

Our organizations encourage the administration to take further action to safeguard this region by both maximizing protections for already recognized areas and expanding existing Special Areas to protect crucial wildlife habitat and other values.

Special Areas in the Western Arctic Reserve are vital in supporting a vast array of wildlife, including polar bears, walruses, muskox, and dozens of species of migratory birds. While there are hundreds of species in the Reserve, caribou merit special consideration. Globally, caribou herds have declined by more than 50% in the past two decades, including severe declines in several Alaska herds that have led to hunting restrictions and negative impacts on communities. In the Western Arctic Reserve, caribou are vital for communities who rely on them for

subsistence. Altering caribou migration patterns and impacting their calving grounds not only adversely affect the caribou—these are also threats to Alaska Native ways of life that are inextricably linked to these landscapes.

The Western Arctic Reserve supports three important caribou herds: the Teshekpuk Caribou Herd, the Western Arctic Caribou Herd, and the Central Arctic Herd. All three herds are under threat from oil and gas development and increasing impacts from climate change. These threats would be mitigated by expanded Special Areas and strengthened protections for these landscapes.

To fulfill the BLM’s statutory obligations to protect the Western Arctic Reserve’s incomparable resources, we recommend that the agency:

- 1. Protect critical migration pathways, calving grounds, and habitats for caribou;**
- 2. Safeguard vital subsistence values for Alaska Native communities who have depended on the region for their way of life since time immemorial; and**
- 3. Ensure that the nesting grounds for millions of migratory birds remain undisturbed by oil and gas development and that fish have fresh, clean waterways that will be sustained well into the future.**

Based on these significant resource values, we also recommend that the BLM take this unique opportunity to expand several existing Special Areas. Most pressing is the expansion of the Teshekpuk Lake Special Area to bridge the gap between it and the Colville River Special Area because of this region’s importance to caribou and the way of life for the Native Village of Nuiqsut.

There is nowhere else in the United States where intact landscapes can be protected on such a vast scale. Expanding the Teshekpuk Lake Special Area to the boundary of the Colville River Special Area would not only protect that region’s movement corridors and habitat for caribou herds, but also connect three out of the five existing Special Areas to safeguard an ecosystem approximately 15 million acres in scale—roughly 7 times the size of Yellowstone National Park.

The Naval Petroleum Reserves Production Act requires that the Department of the Interior provide maximum protection for areas with significant fish and wildlife, subsistence, recreational, and other values. We urge you to utilize the best available science and traditional knowledge to maximize protections for caribou migration pathways and habitats, other wildlife and fish habitats, and the communities that are inextricably linked to the caribou and other species in this landscape that are part of the globally significant and irreplaceable arctic web of life.

Sincerely,

Alaska Soles, Great Old Broads for
Wilderness
Alaska Wilderness League
Braided River
California Environmental Voters
Californians for Western Wilderness
Conservation Lands Foundation
Conservatives for Responsible Stewardship
Defenders of Wildlife
Earthjustice
Endangered Species Coalition
Environment America
Environmental protection Information
Center- EPIC
Friends of the Earth
Gwich'in Steering Committee
Healthy Ocean Coalition
League of Conservation Voters
Northern Alaska Environmental Center
Rocky Mountain Wild
Seeding Sovereignty
Sierra Club
Soda Mountain Wilderness Council
Sovereign Iñupiat for a Living Arctic (SILA)
The Ocean Project
The Wilderness Society
Trustees for Alaska
Tuleyome