

**Alaska Wilderness League • Conservation Lands Foundation •
Northern Alaska Environmental Center • Sierra Club •
The Wilderness Society**

Bud C. Cribley, State Director
Bureau of Land Management
Alaska State Office
222 West Seventh Avenue, #13
Anchorage, Alaska 99513

March 24, 2016

Re: Securing a Conservation Legacy in the Western Arctic Through the Regional Mitigation Strategy

Dear Director Cribley,

On behalf of the above organizations, we appreciate the efforts undertaken by the Bureau of Land Management (BLM) to develop a Regional Mitigation Strategy (RMS) for the National Petroleum Reserve – Alaska (Western Arctic). The RMS is an opportunity for the administration to build on and ensure a lasting conservation legacy in the Western Arctic.

The National Petroleum Reserve Production Act (NPRPA) requires BLM to manage the Western Arctic to protect subsistence, recreational, and fish and wildlife values, among others. The 2013 Integrated Activity Plan (IAP) for the Western Arctic, established or reaffirmed approximately 13 million acres of special area designations and laid out best management practices and lease stipulations to protect other sensitive areas – a significant step forward in the protection of sensitive habitat. Unfortunately, the strength and durability of conservation in the Western Arctic is in question. During the permitting of the first oil and gas project since the IAP and on federal lands in the region, Greater Mooses Tooth-1 (GMT-1), the agency violated these best management practices and issued an “exception” in the Fish Creek buffer to allow for a permanent road and pipeline. This example demonstrates the need for a stronger approach to ensure lasting conservation, which is more true to the IAP.

The RMS provides an opportunity to guide mitigation in the region for the impacts of GMT-1 and other future developments, if any, and, if done right, will ensure that the western arctic is managed as intended by the IAP. To be successful, the RMS must provide opportunities for durable conservation for the duration of impacts from GMT-1 and any potential future projects.

BLM can achieve this success by undertaking the following actions in or in connection with the final RMS:

- 1) **Establish mitigation pools on the Teshekpuk Lake and Colville River Special Areas. By creating mitigation pools through the RMS, the agency will have established areas appropriate for future mitigation actions.**
- 2) **Establish a conservation easement on: a) the core area of the Teshekpuk Lake Special Area; and b) the un-leased portion of the Colville River Special Area.**

These actions, along with compliance with the IAP (unlike the GMT-1 project) will help ensure that the most critical areas affected by GMT-1 and future projects, if any, are safeguarded. Mitigation pools will set aside some of the most important areas for habitat, wildlife, and subsistence for future mitigation actions, such as conservation easements or rights-of-way. It is also crucial that BLM take the next step of establishing conservation easements. BLM acknowledged in the Record of Decision for GMT-1 that there would likely be significant impacts to subsistence and other resources. To compensate for these adverse effects, BLM should durably protect these areas and the wildlife resources and values they support by establishing conservation easements. BLM should take proactive steps to ensure that these remaining subsistence areas are durably protected from development.

We implore BLM to adopt these approaches in-order to reaffirm the agency's commitment to achieve maximum protection of wildlife, habitat, and subsistence in the Western Arctic, consistent with the IAP and NPRPA. These conservation measures are in concert with tribal heritage priorities as well as the need to protect the remaining subsistence use areas for communities.

We understand the complexities of establishing a RMS in the Western Arctic and are committed to working with the agency to ensure the long-term protection of this spectacular area, its resources and its values.

Thank you for your time and attention to this matter.

Sincerely,

Kristen Miller
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Alaska Wilderness League

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