

TRANSPORTATION INSTITUTE

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June 4, 2010

Ms. Sharon Seim
Planning Team Leader
Arctic National Wildlife Refuge
101 12th Avenue, Room 236
Fairbanks, AK 99701

VIA: E-mail: ArcticRefugeCCP@fws.gov

Dear Ms. Seim:

**SUBJECT: FWS-R7-R-2009-N260; 70133-1265-0000-S3
Revised Comprehensive Conservation Plan and EIS for ANWR**

On behalf of the Transportation Institute and our member companies engaged in commerce between Alaska and the Lower 48, I would like to thank the Department of Fish and Wildlife for this opportunity to submit comments concerning the *Arctic National Wildlife Refuge Comprehensive Conservation Plan (CCP)* as circulated on April 7, 2010. We wish to limit our comments concerning the CCP to the consideration by federal agencies of seeking additional areas for wilderness designation in Alaska.

The Transportation Institute was established in 1967 as a Washington-based, non-profit organization dedicated to maritime research, education, and promotion. The Institute member companies participate in all phases of the nation's deep-sea, foreign, and domestic shipping trades, and barge and tugboat operations on the Great Lakes and on the 25,000 mile network of America's inland waterways. All are of U.S. Registry—manned by American citizen-mariners, operating under the world's highest safety standards, and proudly flying the American flag. Many of these operators would be impacted by the expansion of the CCP in ANWR.

The Transportation Institute and our member companies have long supported efforts to assure the Nation has the capacity to enhance our energy security and self-sufficiency. Part of this effort remains a strong commitment for the potential development of ANWR's 1.5 million-acre Coastal Plain (also known as the "Section 1002 area") to remain in the public trust for oil and gas exploration and potential development. The estimated 5.6-16 billion barrels of recoverable oil and 18 trillion cubic feet of natural gas available in the relatively small area of Alaska's Coastal Plain would go a long way in helping to meet this challenge. This is an area some 30 miles wide by 100 miles long. This would allow for the remaining 17.5 million acres comprising the Refuge to be protected from oil and gas activity. In fact, approximately eight million acres of ANWR have already been designated as wilderness, including 450,000 acres of the Coastal Plain between the Aichilik River and the Canadian border. Furthermore, 9.5 million acres of ANWR are classified as a National Wildlife Refuge. Alaska has more than 53 percent of all federally-designated Wilderness lands. Less than one percent of Alaska is in private ownership and available for development. Moreover, 192 million acres of Alaska are currently maintained as parks, refuges, preserves, and conservation system units—including 58 million acres of designated wilderness.

Our concern mirrors the interest of Congress when it deemed the Section 1002 area to be reserved for consideration for oil and gas development when debating and enacting the Alaska National Interest Lands Conservation Act (ANILCA) in 1980. Policymakers at the time understood that a strategic energy policy may well demand the need to responsibly further develop energy resources in the Arctic. Similarly, a new generation of policy leaders will come to understand we can no longer rule out the value of our own significant proven oil and gas reserves—especially when an 800-mile pipeline exists to help safely carry such oil from the well head to tidewater. Surely, sound policy, in an increasingly threatening and distressing global economic and political environment, may well require such reserves to be tapped to fuel the economy, decrease dependence on hostile regimes, and reduce the flow of imported oil into America. To do otherwise, would forever place off-limits

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North America's most promising onshore oil and gas prospect to development and destroy the agreements made when ANILCA became law.

Critically, the technology and the environmental sensitivity of oil field development in the Arctic have evolved steadily in the forty years since the oil and gas facilities at Prudhoe Bay, which are located directly west of ANWR, were designed and constructed. Given these advances, and with the environmental safeguards that are currently applicable to all oil and gas activities in the Arctic, development can take place on the Coastal Plain in an environmentally sound manner without lasting effects.

It is a serious misconception that oil and gas development would destroy the habitat functions of the Coastal Plain. In reality, full leasing, development and production from three oil fields, for example, would affect less than one percent of the area's land surface by both direct habitat alteration and by indirect effects such as road dust or local impoundments of water along a road. Ninety-nine percent of the area would remain untouched; and the area's habitat will not be altered sufficiently to affect the size, growth rate, or regional distribution of fish and wildlife populations. The area will continue to be used by caribou for calving and will continue to provide habitat for polar bears, brown bears, wolves, muskoxen and millions of migratory birds. Specifically, much mythology has occurred concerning the threat to the Porcupine caribou herd that tends to traverse the 1002 area for a few weeks each year. The reality of many years of documented experience of caribou in the Arctic points to a far different conclusion. The Central Arctic caribou herd, active in and near the existing Prudhoe Bay oil fields, has thrived –its number multiplying six times since oil production began 30-plus years ago.

Most recently, our Nation has experienced the catastrophe of an ultra-deep-sea oil well failing and threatening untold wildlife, fisheries, and coastline. This tragic episode should give us further pause and not consider barring a proven and reliable method of oil and gas exploration, with years of fine tuning and consistent reliability, in an area likely to have tremendous reserves. The technical difficulties of exploring and developing shore-based Arctic oil and gas have been surmounted and continuous improvement in these methods, along with a sea change of progress in its reliable waterborne transport, must remain one element in a spectrum of sensible and sustainable actions and choices to secure our energy future and economy.

The Institute anticipates the U.S. Fish and Wildlife Service will give our observations due consideration. We also appreciate the opportunity to comment on an issue of great significance and concern to our member organizations.

Sincerely,

Richard Berkowitz
Director, Pacific Coast Operations