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Governor Sean Parnell  
STATE OF ALASKA

May 11, 2010

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

Re: Arctic National Wildlife Refuge (ANWR) Comprehensive Conservation Plan (CCP)

Dear Ms. Seim,

Thank you for this opportunity to comment on behalf of the State of Alaska regarding the upcoming revision of the Arctic National Wildlife Refuge (ANWR) Comprehensive Conservation Plan (CCP).

I strongly oppose any plan or wilderness review process that further encumbers or complicates the potential for oil and gas development on the coastal plain, specifically the area described in Section 1002 of the Alaska National Interest Lands Conservation Act (ANILCA).

The 1.5 million acre coastal plain area of Section 1002 was created in the spirit of compromise by members of Congress. A much larger area of ANWR (17.5 million acres) is not specifically set aside for oil and gas development. The Section 1002 area potentially holds billions of barrels of recoverable oil and trillions of cubic feet of natural gas (The United States Geological Survey estimates range from 5.7 and 16 billion barrels of oil.) Because of advances in technology, like the use of directional drilling, only a very small area of Section 1002 would be used to develop these resources.

Oil and gas development in the Section 1002 coastal plain would provide a secure on-shore domestic supply source of energy for the nation, create tens of thousands of jobs throughout the country, and ensure the continued operation of the Trans Alaska Pipeline System for years to come. We must keep good paying jobs at home and reduce our purchases of foreign energy supplies.

A concern that I have, and a reason why I have included comments about the benefits of opening the Section 1002 area, is based on a statement by the U.S. Fish and Wildlife Service (USFWS) in the formal scoping notice which notes that some concerns and interests related to the Refuge will not be addressed in the Revised CCP. "For example, the U.S. Congress has reserved for itself in Section 1002(1) of the ANILCA, 16 U.S.C. 3142(1), the decision as to whether or not the Refuge Coastal Plain (also called the 1002 Area) should be made available for oil and gas development. Therefore, the USFWS does not have the authority to decide this issue, and we will not consider or respond to comments that support or oppose such development during this CCP process".

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The language in the notice could be read to suggest that the USFWS believes Congress has reserved only the question of oil and gas development for itself and that there is administrative discretion regarding wilderness designations. I believe that, in point of fact and as a matter of law, the decisions about both types of land uses have been reserved by Congress for Congress. I would appreciate your clarifying the position of the USFWS on this point in a separate letter to me.

For the remainder of ANWR, the State of Alaska remains opposed to any new wilderness studies, recommendations, or designations. This long-held position is based on a number of factors one of which is that Alaska already hosts approximately 57 million acres of designated wilderness, which is over half of all congressionally-designated wilderness in the United States.

Alaskans deserve finality regarding conservation designations. Alaskans lived through the rancorous debates leading up to ANILCA, and need to be allowed to move forward in developing sound approaches to land use and conservation within the existing policy framework.

Wilderness designations tie the hands of federal and State managers, including the conduct of fish and wildlife management by the Alaska Department of Fish and Game, and the execution of geologic outcrop investigations relevant to adjoining State lands by the Alaska Department of Natural Resources.

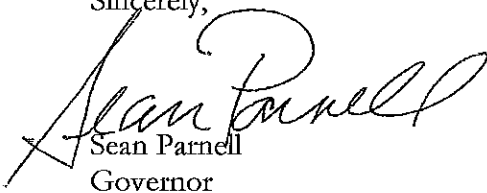
The USFWS has shown that intrinsic wilderness values can be adequately protected over the long term without formally determining wilderness eligibility or recommending designation.

Wilderness designations increase the built-in tension between protection of wilderness values and corresponding protection of Alaskan's rural way of life. The subsistence life depends on activities and methods of access that tend to be opposed by wilderness enthusiasts, especially those from the Lower 48 states that do not understand the rigors of living in Alaska's rural communities.

Under Title XI of ANILCA, wilderness designations automatically elevate authorization of transportation and utility corridors to Congress. New wilderness designations would reduce the State's flexibility to improve Alaska's fledgling infrastructure.

I appreciate the opportunity to provide these comments to you. At your convenience, I will make appropriate State employees in our Department of Natural Resources and Department of Law available to participate in the CCP.

Sincerely,

  
Sean Parnell  
Governor

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cc: The Honorable Lisa Murkowski, United States Senate  
The Honorable Mark Begich, United States Senate  
The Honorable Don Young, United States Congress  
The Honorable Kenneth Salazar, Secretary, U.S. Department of Interior  
Tom Strickland, Assistant Secretary, U.S. Department of Interior  
Kim Elton, Interior Director of Alaska Affairs, U.S. Department of Interior  
Pat Pourchot, Special Assistant to the Secretary of Alaska Affairs, US Department of Interior  
Geoffrey Haskett, Regional Director, U.S. Fish and Wildlife Service  
John Katz, Director of State and Federal Relations and Special Counsel, Office of the Governor