



Dave Harbour  
President

May 10, 2010

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

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

Dear Ms. Seim:

Today I am participating in your public meeting in Anchorage—representing only myself—to comment on the U.S. Fish and Wildlife Service’s revision of the ANWR Comprehensive Conservation Plan (CCP). I speak to you as a 39-year citizen of Alaska who has spent time in ANWR and reviewed environmental studies conducted within ANWR. I have also served as a commissioner on the regulatory commission of Alaska, as President of the American Bald Eagle Foundation, as Chairman of the Anchorage Chamber of Commerce and of the Alaska Council on Economic Education.

**Recommendation.** *I am here today to urge you (1) to retain a reasonable CCP absent compelling scientific or other evidence justifying revision. I also urge you (2) to recommend that the Secretary urge Congress to adopt legislation which will allow ANWR’s significant prospective energy reserves within the 1002 area to be discovered, evaluated and produced.*

**Rationale.**

1. You should retain a reasonable CCP absent compelling scientific or other evidence justifying revision for several reasons.
  - a. Your ‘climate change’ webpage suggests a certain bias which could infect your ability to scientifically and properly revise the CCP in the public interest. The webpage says that, “Worldwide scientific consensus tells us that human activity is changing the climate system itself. As climate changes, the abundance and distribution of wildlife and fish will also change. Some species will adapt successfully to an abruptly warming world; many will struggle; and others will disappear.”
  - b. One hopes the statement above is a general observation, not a pretext for more restrictive management. However, your web page acknowledges that your evidence of ‘consensus’ flows from your reliance on the Intergovernmental Panel of Climate Change (IPCC), whose policy makers have been caught red handed perpetrating climate change fraud.
  - c. Accordingly, any changes affecting the 1002 area, the wild rivers or other Refuge areas should be based on hard evidence and scientific discipline, not the reliability of IPCC members known more for intellectual dishonesty than for ANWR expertise.
  - d. I would, however, recommend one change. Please adjust your permitting process to forbid professional and amateur wildlife photographers and environmental researchers from spooking large flocks of snow geese, herds of calving caribou or cub and mom polar bear pairs from low flying aircraft just to obtain wildlife action photos. Such stress can exhaust and kill the birds and animals. In the event you view films of wildlife photographers who have in your opinion spooked the birds or

animals to obtain action photos or movies, their producers should be subject to severe fines.

2. You should recommend that the Secretary urge Congress to adopt legislation which will allow ANWR's significant prospective energy reserves within the 1002 area to be discovered, evaluated and produced.
  - a. In 1974 the Alaskan Arctic Gas Pipeline Company filed an application with the Federal Power Commission which involved a right-of-way across the Arctic National Wildlife Range. In the 1980 ANILCA legislation the 'Range' was expanded and its rules made more rigorous as Congress converted its status to 'Refuge'. What is significant is that Arctic Gas' environmental and geotechnical studies proved the concept of safely accessing the Coastal Plain in winter months, when migrating species were absent, using ice roads for access. This is the same process that would be employed to obtain access to the oil and gas reserves in today's 1002 area. Accordingly, I urge you to review not only your own studies but subsume into your record the significant work reflected in Arctic Gas' extremely valuable and relevant, ***44-Volume Biological Report Series***; it should still be available at the University of Alaska Consortium Library, Library of Congress, FERC and Department of Interior.
  - b. America uses a certain amount of oil and gas. If we don't obtain it here, we will likely buy it from areas of the world that have more lax regulation of oil and gas. In return for that resource, we'll terminate oil and gas primary and service sector jobs here and create them abroad. Then we'll send our money to those foreign areas to buy the resource. Our federal and state treasuries will not receive the royalty and tax revenue that would have accompanied domestic vs. foreign production. The foreign flow of money will increase our balance of payments deficit, debase our currency, increase the expense of imported oil and gas and weaken our national defense.
  - c. Alaska's compact with the Federal government, confirmed with approval of a plebiscite here and an act of Congress in Washington is in large measure based on the ability of Alaska's natural resources to support Alaskan Statehood. While our dearly departed Governor Walter J. Hickel recommended the 104 million acres allotted to Alaska via the statehood act, our compact also assumed that over half of the resource revenue flowing from resource development on Federal lands would be allocated to Alaska's government. To not subject itself to charges of violating the compact, the Federal government should reasonably develop lands under its jurisdiction to the benefit of both Alaska's citizens and those of the United States.
  - d. Last, I will assert that the improved stocks of the Central Arctic Caribou herd in the Prudhoe Bay area is a testament to the good husbanding of resources which accompanies oil and gas operations. The areas are protected from poachers. Since caribou quickly acclimate to human presence, as do the moose in my back yard in Anchorage, they find that rising from the mosquito-infested and marshy muskeg to rest from time to time on gravel pads used during production decreases mortality of spring-born calves. Production noise little affects them. One could reasonably conclude that modest human activity in the 1002 area as envisioned by the ANILCA Congress in 1980 would serve the public interest both by producing natural resource wealth and safeguarding the coastal plain's natural treasures.

**Conclusion.** You have a big job to do. As a former regulator I just ask that you do what you do being conscious of the public interest and of good science. I ask you to remember that in your effort to balance values, you think of how the economic values of Alaskans specifically and Americans in general can be squared with the environmental values so important to us all.

Sincerely,