

American Association of Petroleum Geologists

An International Geological Organization



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President

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Ms. Sharon Seim
Planning Team Leader, U.S. Fish and Wildlife Service
Arctic National Wildlife Refuge
101 12th Avenue, Room 236
Fairbanks, AK 99701-6237

Re: Removal of wilderness review from comprehensive conservation plan (CCP)

Dear Ms. Seim:

Thank you for the opportunity to comment on behalf of the American Association of Petroleum Geologists (AAPG) on the U.S. Fish and Wildlife Service's development of a revised comprehensive conservation plan and environmental impact statement for the Arctic National Wildlife Refuge (ANWR).

AAPG is the world's largest scientific and professional geological association. The purpose of the association is to advance the science of geology, foster scientific research, and promote technology. AAPG has nearly 37,000 members around the world, with roughly two-thirds living and working in the United States. These are the professional geoscientists in industry, government, and academia who practice, regulate, and teach the science and process of finding and producing energy resources from the Earth.

AAPG strives to increase public awareness of the crucial role that the geosciences, and particularly petroleum geology, play in our society.

AAPG has long supported the exploration and development of the oil and natural gas resources located within ANWR. And while the Service has explicitly excluded consideration of oil and natural gas development issues in the CCP, the plan does include a review of areas for possible wilderness designation. Any such designation could negatively impact the nation's ability to benefit from the natural resources located in ANWR.

Conservation of wildlife and ecosystems is necessary and important. As earth scientists we understand that. And the Alaska National Interest Lands Conservation Act (ANILCA) of 1980 was enacted to manage such conservation, maintain water quality, and ensure the rights of local people to use the land for subsistence.

But there is an important principle of multiple-use that must be considered when managing federal lands. AAPG believes responsible development of petroleum and other natural resources on federal lands does not typically conflict with conservation goals. Additional wilderness designations in the refuge could unnecessarily restrict the possibility of development, if Congress were to open portions of ANWR in the future.

In addition, the possibility of using wilderness designations and National Monument designations under the Antiquities Act, as they have been in the past, to advance special interests to the exclusion of economic development on federal lands must be guarded against. Such practice does not permit the necessary public input and full consideration of the ramifications of these decisions.

I therefore urge the Service to focus on the specific objectives for the CCP as outlined in ANILCA, and remove from consideration in the plan the designation of additional wilderness areas.

Sincerely,

John C. Lorenz
AAPG President