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**AOGA FILES COMMENTS ON PROPOSED CRITICAL HABITAT DESIGNATION  
FOR RINGED SEALS**

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*AOGA opposes adding government regulations that could slow down development*

ANCHORAGE- March 31, 2015- The Alaska Oil and Gas Association (AOGA) today filed official comments with the National Marine Fisheries Service (NMFS) opposing the proposed area for critical habitat for the ringed seal, which has been listed as threatened under the Endangered Species Act.

NMFS proposes to designate approximately 350,000 square miles of Alaskan and U.S. jurisdictional offshore areas as critical habitat for ringed seals. This designation is more than twice as large as the entire State of California, and would be the largest critical habitat designation in the history of the Endangered Species Act. Additionally, ringed seals were listed as threatened in 2012 based on *100-year* climate change models.

AOGA'S opposition is based on the following facts: the proposed designation intends to address the needs of a species that numbers in the millions, shows no signs of decline in number or range, and faces no current threats.

Critical habitat was designed to address "specific areas" with particular habitat features essential to supporting the population. In AOGA's view, the proposed critical habitat areas fail to use science-based evidence to support the designation of 350,000 square miles as critical habitat in any circumstance, much less one in which the species being discussed is abundant and healthy.

The proposed designation also overlaps enormous Outer Continental Shelf areas containing nationally strategic petroleum reserves. Despite this, NMFS does not provide meaningful analysis of the economic effects of such a sweeping designation across these important areas. Given the healthy status of the ringed seal, the economic impacts of the proposed designation are clearly and substantially outweighed by the costs.

In addition, AOGA points out that oil and gas activities have occurred for decades in the Arctic with no detectable impacts on the ringed seal population. These activities are rigorously managed under a variety of laws, including the Marine Mammal Protection Act, and it is unlikely an additional layer of regulation would provide additional protection to ringed seals. Instead, the critical habitat designation will result in substantial regulatory and other costs to industry, with no identifiable benefit to ringed seals.

A full copy of AOGA's comments on this issue is available online at [www.aoga.org](http://www.aoga.org).

AOGA is a professional trade association whose mission is to foster the long-term viability of the oil and gas industry in Alaska for the benefit of all Alaskans. Its 14 members represent the majority of oil and gas producers, explorers, refiners, transporters and marketers in Alaska. More information can be found at [www.aoga.org](http://www.aoga.org).

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