



March 13, 2019

Nicole Hayes
Project Coordinator
222 West 7th Avenue, Stop #13
Anchorage, Alaska 99513

RE: Coastal Plain Oil and Gas Leasing Program Draft Environmental Impact Statement

Dear Nicole Hayes,

Greetings from Seattle Audubon, Washington State's oldest conservation organization. We are one of the largest and most active Audubon chapters in the U.S., leading a local membership of over 4,000 in appreciating, understanding, and protecting birds and their natural habitats. I write to you today on behalf of those members to express our dismay at and resolute opposition to the prospect of oil and gas leasing on the Arctic National Wildlife Refuge's Coastal Plain.

Though Seattle is more than 1,600 miles away from ANWR's Coastal Plain, birds connect us. Of the 156 bird species documented on ANWR's Coastal Plain, 104 (67%) migrate through or spend time in Seattle, and 116 (74%) migrate through or spend time Washington State. In Washington's Skagit Valley, just an hour north of Seattle, thousands of Snow Geese, Trumpeter Swans, and ducks feed among our farm- and wetlands. The area is an important migratory stopover point before the birds travel farther north to breed. We celebrate our winter waterfowl at the annual Snow Goose and Birding Festival. The birds we love and celebrate are your birds, too. We share the responsibility to protect them.

Over the last 100 years, Seattle Audubon has worked to protect birds by protecting natural areas throughout North America, including ANWR. We've been part of the Alaska Coalition of Washington, which works to assure lasting protection of Alaska's national public lands and waters. We educate our members about the importance of acting locally to protect migratory birds. And we lobby our elected representatives to reject inappropriate oil and gas development. Few sites could be more inappropriate for oil and gas leasing than ANWR's Coastal Plain.

The wilderness characteristics of ANWR are superlative. In the United States, very little unmodified wilderness exists outside of Alaska. ANWR ranks among the wildest places. Due to the global scarcity of wilderness (Watson et al. 2018), the Coastal Plain's wilderness values alone should disqualify it from any consideration of oil and gas development.

But the Coastal Plain is more than just a wild, unspoiled landscape. It is the biological heart of ANWR, important as summer and breeding habitats for birds, as a calving site for Porcupine Caribou, as onshore denning habitat for Polar Bears, and for subsistence activities indigenous communities. Arctic habitats are delicate and already bearing the worst impacts of climate change,

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warming more than twice as fast as the rest of the world. The arctic climate is shifting to a warmer, wetter, more variable state (AMAP 2017). Sea levels are rising around the world and coastal habitats globally are at risk of being submerged, including along the Coastal Plain. For a region undergoing such dramatic changes, it is unconscionable to consider oil and gas development.

We are concerned about the rushed timeline under which the draft EIS was prepared. We note the following concerns, questions, and comments:

- **Required Operating Procedure 43 (pg. 2-36):** By what process will equipment and vehicles be certified as free of nonnative invasive species? We are not aware of any such certification process nor of detection methods for all nonnative invasive species. Please clarify.
- **General Wildlife and Habitat Protections (pg. 2-36):** Two Required Operating Procedures require minimization of loss of populations and habitat for plant species (ROP 44) and mammalian species (ROP 45) designated as sensitive by BLM in Alaska. Please clarify why there are no requirements to protect avian, fish, or invertebrate species designated as sensitive by BLM in Alaska.
- **Appendix J:**
 - Gyrfalcon misspelled as "Gyrfaon." Please correct.
 - Peregrine Falcon misspelled as "Peregrine Faon." Please correct.
 - Genus of all falcon species (*Falco sp.*) misspelled as "Fao." Please correct.
 - IUCN Red List Status not correctly listed:
 - Spectacled Eider should be listed as Near Threatened. Please correct.
 - Black-tailed Godwit should be listed as Near Threatened. Please correct.
 - Rufous Hummingbird should be listed as Near Threatened. Please correct.

It should go without saying that oil and gas development is entirely inconsistent with the objectives of a National Wildlife Refuge. On behalf of more than 4,000 Seattle Audubon members, we urge you to halt this process and end the rush to sell oil and gas leases on the Coastal Plain of the Arctic National Wildlife Refuge.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joshua N. Morris", with a long horizontal flourish extending to the right.

Joshua N. Morris
Urban Conservation Manager
Seattle Audubon

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References

- Watson, James EM, Oscar Venter, Jasmine Lee, Kendall R. Jones, John G. Robinson, Hugh P. Possingham & James R. Allan. Protect the last of the wild. *Nature* 563, 27-30 (2018). Available from <https://www.nature.com/articles/d41586-018-07183-6>
- AMAP. 2017. Snow, Water, Ice and Permafrost. Summary for Policy-makers. Arctic Monitoring and Assessment Programme (AMAP), Oslo, Norway. 20 pp. Available from <https://www.amap.no/documents/doc/Snow-Water-Ice-and-Permafrost.-Summary-for-Policy-makers/1532>