



North Central Washington Audubon Society
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November 6, 2023

Serena Sweet
BLM-Alaska
222 West 7th Avenue, #13
Anchorage, AK 99513

Re: Draft SEIS for the Coastal Plain Oil and Gas Leasing Program

Dear Ms. Sweet,

North Central Washington Audubon Society (NCWAS), with approximately 500 members in Chelan, Okanogan, Douglas, and Ferry counties in Washington State, is submitting the following comments to the Draft Supplemental Environmental Impact Statement (DSEIS) for the Coastal Plain Oil and Gas Leasing Program.

Numerous species of birds that migrate to or through our region of Washington State are dependent on habitats occurring on the Arctic National Wildlife Refuge's Coastal Plain. While the welfare of birds is our organization's primary focus, we are also concerned about the impacts that oil and gas exploration and development will have on fish and wildlife in general. Because arctic habitats are by nature extremely fragile and easily degraded, the SEIS alternative that is least damaging should be ultimately selected for implementation.

We have reviewed the Draft SEIS and strongly favor Alternative D. Of the alternatives being considered, it will clearly lead to the least damaging outcomes for the Coastal Plain's various habitats and the fish and wildlife they support. The following are the primary reasons for preferring Alternative D over the other alternatives.

- 1) It will meet the leasing requirement under the Tax Act, while requiring only 1,040 acres of surface disturbance.
- 2) It provides for the largest amount of "no surface occupancy" acreage.
- 3) It allows seismic activities only on lands available for lease.
- 4) It offers the strongest protections for the coastal shoreline and near-shore marine waters.
- 5) It includes the most stringent Required Operating Procedures of any alternative.
- 6) It offers the strongest protections for Polar Bears, Caribou, marine mammals, birds, fish, and other wildlife.

There are additional reasons for our preference for Alternative D, as it contains numerous most protective stipulations under which oil and gas operations on leases would take place. But also very important, as mentioned in the DSEIS, it “addresses the NEPA deficiency identified by the Secretary in SO 3401 regarding the failure of the Final Coastal Plain EIS (BLM 2019) to adequately analyze a reasonable range of alternatives”.

Finally, the Arctic National Wildlife Refuge is exactly what its name indicates – a wildlife refuge. It’s very unfortunate that Congress, at least for now, has mandated a lease sale for the Coastal Plain. But given that a lease sale has been mandated, and because oil and gas operations occurring in the Coastal Plain would be clearly detrimental to the welfare of the fish and wildlife the refuge is intended to protect, Alternative D is the most responsible alternative to implement.

Sincerely,

A handwritten signature in cursive script that reads "Arthur Campbell".

Arthur Campbell

President, North Central Washington Audubon Society