

Bureau of Land Management, Alaska State Office  
Attn: State Director Chad Padgett  
222 West 7th Avenue, Mailstop 13  
Anchorage, AK 99513

Dear State Director Padgett,

On behalf of the Ventura Audubon Society and its 600 members, we strongly oppose leasing **all tracts** on the coastal plain of the Arctic National Wildlife Refuge. The coastal plain of the Arctic Refuge is vital nesting habitat for vast numbers of birds, including Tundra Swans, American Golden-Plovers, and Sandhill Cranes. The coastal plain is crucial denning habitat for polar bears. It is also the calving area for the Porcupine caribou herd, an essential subsistence resource for Indigenous Peoples of Alaska and Canada.

Development would create a spider web of drilling rigs, oil pipelines, and roads—permanently altering this wild landscape for people, birds, polar bears, and hundreds of thousands of caribou. Plus, expanding oil and gas development in the Arctic will exacerbate the impacts of climate change in the Arctic. The Bureau of Land Management (BLM) has also not adequately addressed the impacts to water quality and quantity within the coastal plain of the Arctic Refuge. These analyses should have been completed before the finalization of any leasing plan.

**All tracts should be excluded** from oil and gas leasing because the coastal plain provides critical habitat for denning polar bears. With climate change, land denning sites are more important. Map 3-37 shows that leasing nearly anywhere on the coastal plain would bring impacts to polar bear critical habitat, a U.S. threatened species.

The Porcupine caribou herd, a vital traditional resource for the Indigenous Peoples and communities of the Arctic, would be harmed by leasing in tracts 1-5, 7-14, 18, 20-24. These tracts include important caribou calving habitat and post-calving migration corridors.

Leasing should be excluded in tracts 7, 27, 29, 31, 32 because these areas contain critical fish habitat, especially for species' important overwintering streams.

**All tracts should be excluded** from leasing to protect birds because the coastal plain is home to millions of birds that breed and nest in the region. Additionally, tracts 4-5, 7, 11-12, 18-21, 28 are important for Snow Geese. Summer seismic recovery operations, winter seismic exploration activities, and residual impacts of oil and gas drilling could disturb these areas during a very vulnerable time for Snow Geese as they stage in the Arctic Refuge before undertaking long distance seasonal migrations.

Thank you for considering these comments and my request to BLM to **oppose leasing in ALL tracts within the coastal plain** of the Arctic National Wildlife Refuge.

Sincerely,

Bruce E. Schoppe  
VP, Conservation  
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