



# Orange Audubon Society

(A Chapter of National and Florida Audubon Societies)

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[www.orangeaudubonfl.org](http://www.orangeaudubonfl.org)

December 10, 2020

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

Dear State Director Padgett:

On behalf of Orange Audubon Society and its 2,000 member households in Central Florida, I am writing to urge you to oppose leasing all tracts on the coastal plain of the Arctic National Wildlife Refuge. Our members care about birds and additional climate change.

About 70 species of birds nest on the narrow Arctic Refuge coastal plain, between the Brooks Range and the Beaufort Sea. Among the vast numbers of birds nesting there are Tundra Swans, American Golden-Plovers, and Sandhill Cranes. Other nesting species of serious concern are Red-throated Loon, Common Eider, King Eider, Long-tailed Duck, and Buff-breasted Sandpiper. All tracts should be excluded from leasing to allow continued survival of these and other species. Winter seismic exploration activities, summer seismic recovery operations, 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 National Wildlife Refuge before undertaking long distance seasonal migrations. Tracts 4-5, 7, 11-12, 18-21, 28 are particularly important for Snow Geese.

Ornithological research over the past 50 years, supplemented by citizen science, has documented a decline in bird populations worldwide of 2.9 billion birds. Drilling operations in Prudhoe Bay and other North Slope oil fields have already resulted in direct losses of habitat for Arctic nesting birds and have altered bird distributions. It is critical that new loss of habitat does not occur.

New oil development would create a spider web of drilling rigs, oil pipelines, and roads—permanently altering this wild landscape not only for birds, but also for polar bears, hundreds of thousands of caribou, and subsistence resources for the Indigenous Peoples of Alaska and Canada.

Further expanding oil and gas development in the Arctic will exacerbate the impacts of climate change in the Arctic, which will have global impacts.

The Bureau of Land Management (BLM) has not adequately addressed the impacts to water quantity and quality within the coastal plain of the Arctic Refuge, including the risks of a spill reaching coastal lagoons or nearshore waters. These analyses should be completed before finalization of any leasing plan.

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,

Deborah Green

Orange Audubon Society President

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