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DEPARTMENT OF ECOLOGY
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January 20, 2026

Acting Director Matthew Giacona
C/O Kelly Hammerle, National Program Manager
Bureau of Ocean Energy Management
U.S. Department of Interior
45600 Woodland Road
Sterling, VA 20166

RE: Comments for the 11th National OCS Oil and Gas Leasing Program (BOEM-2025-0483), submitted via regulations.gov web portal

Dear Acting Director Dr. Giacona and Program Manager Hammerle:

Thank you for the opportunity to comment on the proposal by the U.S. Department of Interior regarding the 11th National Outer Continental Shelf Oil and Gas Leasing Program: First Analysis and Proposal. Together, the Washington State Departments of Ecology, Fish and Wildlife, Natural Resources and Parks assert that offshore oil and gas development anywhere in the Pacific region would put Washington's natural resources, economy, and communities at risk.

The ocean resources of the state of Washington along with the people, Tribal governments, and communities they support are inherently connected to Oregon and California economically and ecologically through the California Current Large Marine Ecosystem. Therefore, we oppose the inclusion of oil and gas leases on the Pacific Outer Continental Shelf (OCS) Region, including Northern California, Central California, and Southern California Program Areas.

Economic and cultural resources risk

The fishing, aquaculture, recreation, shipping and military uses of the Pacific Ocean along the West Coast are economically, culturally, and socially vital for all Americans. Washington State has the largest, most productive commercial shellfish industry in the nation, including crabs, oysters, clams, and mussels. The National Oceanic and Atmospheric Administration (NOAA) has recognized that many coastal communities in Washington are "fisheries-dependent," which means they have much higher involvement in and reliance on fisheries activities than other coastal communities on the West Coast.

These Washington industries support hundreds of thousands of jobs that depend on clean water and beaches, uninterrupted access to fishing grounds and shellfish beds, and healthy, sustainable ecosystems. The economic and cultural value they provide is irreplaceable, generating billions of dollars for local, regional, and national economies.

Washington's ocean economy is comprised of an internationally significant fishing industry, a major tourism and recreation sector, robust marine transportation activities and a strategically important military presence. These are quantitatively summarized below:

- In 2021, Washington's ocean economy supported 127,578 jobs across 6,811 businesses and contributed $15 billion to our economy.[1]
- In 2022, commercial seafood harvest and production alone supported nearly 88,000 jobs and accounted for $11.2 billion in sales.[2]
- Tourism and recreation accounted for 5% of Washington's total ocean economy in 2021, employing 68,249 people across 5,403 businesses. This sector includes restaurants, hotels and lodging; marinas, boat dealers and charters; campsites and recreational vehicle parks; scenic water tours, sporting goods manufacturing, amusement and recreation services, recreational fishing and shellfish harvesting, zoos, and aquariums—contributed $5.1 billion to Washington's economy. [1]
- In 2022, 6.2 million people in Washington participated in wildlife watching, 1.2 million participated in fishing and shellfish harvesting, and approximately 291,000 participated in hunting activities. Together, these activities generated about $9 billion annually in trip-related and equipment expenditures.[3]
- The whale watching industry alone contributes $80.3 million in annual sales revenues and serves about 167,000 customers annually.[4]
- In 2021, marine transportation—encompassing oil tankers and fuel barges, fishing vessels, cargo freighters, passenger ships, marine services, navigation equipment, and warehousing—employed 24,482 people across 474 establishments. The sector contributed $2.9 billion to our economy.[1] More than 70,000 vessel transits were tracked in 2024 alone.[5]

- In 2023, there were more than 56,000 active-duty military personnel, including 22,644 active-duty Navy personnel stationed in Washington state[6]. While there are large military installations in the Puget Sound region, these bases also regularly utilize the

[1] National Oceanic and Atmospheric Administration (NOAA). 2025. Economics: National Ocean Watch (ENOW) Data. https://coast.noaa.gov/digitalcoast/data/enow.html [Accessed December 9, 2025]
[2] National Marine Fisheries Service. 2024. *Fisheries Economics of the United States, 2022*. U.S. Dept. of Commerce, NOAA Tech. Memo. NMFS-F/SPO-248B, 28 p. https://www.fisheries.noaa.gov/resource/document/fisheries-economics-united-states-reports [Accessed December 9, 2025]
[3] Van Deynze, B. 2024. Fishing, Hunting, and Wildlife-Associated Recreation in Washington: Participation and Expenditures in 2022. Washington Department of Fish and Wildlife, Olympia, Washington. https://wdfw.wa.gov/sites/default/files/publications/02466/wdfw02466.pdf [Accessed December 9, 2025]
[4] Martin Associates. 2024. *Economic Impacts of Pacific Whale Watch Association Tourism in the Salish Sea.* https://static1.squarespace.com/static/581cbad4be6594d1fe23358b/t/65cd0211ff8f6d4183014aab/1707934226004/PWWA+Economic+Impact+Report+-+Feb.+2024.pdf [Accessed December 16, 2025].
[5] Marine Exchange of Puget Sound. 2024. 2024 Annual Report. marexps.com/2024_annual_report [Accessed December 23, 2025].
[6] U.S. Department of Defense, Office of the Deputy Assistant Secretary of Defense for Military Community and Family Policy. 2023. 2023 Demographics Profile of the Military Community. download.militaryonesource.mil/12038/MOS/Reports/2023-demographics-report.pdf [Accessed December 16, 2025]

Pacific Ocean off Washington's coast for mission-critical training, testing, and defense purposes.

History, policy and legal considerations of oil and gas activities

As noted in the Request for Information for the 11th National OCS Program, the entire Pacific Region, including Washington's Pacific Coast, has not been included in any of the five-year oil and gas leasing programs since the 1987-92 program. This is because previous analyses of the Washington OCS concluded there is poor potential for significant petroleum reserves seaward of the continental shelf.[7] On the continental shelf, the greatest potential for petroleum reserves is likely to be found near the coastline,[8] where an oil spill would have disastrous economic and environmental consequences.

On the Washington Coast, a past proposed oil and gas lease sale and multiple major oil spills prompted greater protection of our shoreline and marine waters. [9] Between 1988 and 1994, five spills released more than 1 million gallons of oil to Washington's coastal waters. Three of these oil spills adversely impacted state and Tribal resources and even reached Canadian waters. These incidents prompted the federal government to cancel a pending lease sale in 1990. After two more major oil spills affected Washington's coastal marine waters, the NOAA established the Olympic Coast National Marine Sanctuary in 1994. Oil and gas leasing and development is prohibited inside the 2,189 square mile sanctuary off Washington's northwest coast.

Oil and gas leasing, exploration, and production on the OCS is inconsistent with Washington state laws, policies, and goals. Washington is transitioning to generating power and electricity using renewable energy sources such as solar and onshore wind to help combat the detrimental effects of climate change. Washington's numerous state policies and initiatives are detailed in the Washington State Climate Resilience Strategy and Washington State Energy Strategy. [10] The state's goal is to develop clean energy to support sustainable economic development while protecting our coastal communities, Tribal governments and environmental resources. This includes adopting new regulations to reduce greenhouse gas emissions and carbon pollution; encouraging clean energy production and storage; accelerating electrification across multiple sectors; helping communities build resilience to climate hazards; investing in renewable energy resources and energy efficiency; and addressing regional needs for infrastructure and electrical grid modernization.

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[7] Washington State Department of Natural Resources. 1989, 2001. Reprint 13. Washington State and Offshore Oil and Gas: An Assessment of the Oil and Gas Potential of the Washington Outer Continental Shelf. www.dnr.wa.gov/Publications/ger_reprint13_oil_gas_wa_cont_shelf.pdf [Accessed December 16, 2025].

[8] *Id*.

[9] Major spills include the SS MOBIL OIL grounding (1984; 200,000 gallons of crude oil spilled), ARCO ANCHORAGE grounding (1985, 239,000 gallons of crude oil spilled), NESTUCCA barge grounding (1988; 231,000 gallons heavy oil spilled) TENYO MARU collision with TUO HAI (1991, 400,000 gallons of heavy oil spilled), and the Crowley BARGE 101 spill (1994, 26,000 gallons of diesel spilled).

[10] State Energy Strategy, Department of Commerce. commerce.wa.gov/energy-policy/state-energy-strategy/ [Accessed December 16, 2025].

Furthermore, Washington State law:

- Prohibits oil and gas exploration, production, and drilling in state marine waters.[11]
- Establishes policies guiding ocean management, part of Washington's federally approved Coastal Zone Management Program, including:
    - Prioritizing ocean uses that do not adversely impact renewable resources Conserving fossil fuels.
    - Protecting existing ocean uses and resources from long-term significant adverse impacts.
    - Incorporating other state authorities including the Shoreline Management Act,[12] Water Pollution Control Act,[13] and Clean Air Act[14] and their associated regulations.

Additionally, resources off Washington's Pacific Coast are subject to complex intergovernmental management. Four coastal Tribes maintain treaties with the United States that reserve their right to hunt and fish in Usual and Accustomed Areas, including large areas of the Pacific Ocean extending 30 to 40 nautical miles off Washington's Coast. This has led to a unique co-management situation between Tribes, the federal government, and the state of Washington.

Risks and potential for environmental damage from oil spills

New oil and gas activity off the Pacific Coast would pose risks to Washington marine resources. Any expansion of oil and gas activities will result in increased vessel traffic, including a higher risk of oil spills and ship-related accidents. Indirectly, fish and wildlife species including salmon and endangered orca whales migrate up and down the coastline within the California Current Large Marine Ecosystem. These species could be harmed by oil and gas operations, vessel accidents, and oil spills.

Washington has a rich coastal culture, unique ecosystems, and unsurpassed beauty. Our state also has treacherous offshore weather almost year-round. Between October and March, numerous winter storm systems, including atmospheric rivers, move across the Pacific Ocean. As they approach the West Coast, wind strengthens, often reaching gale force and generating dangerous offshore ocean conditions.[15] These weather patterns significantly increase the risks of vessel-related accidents and oil spills. Furthermore, much of Washington's Pacific coastline is rocky and remote, with few roads and access points, making responses to oil spills challenging, slow, and devastating to the environment. Other, more accessible areas are also highly valuable and vulnerable, providing key habitat for shellfish, fish, and shorebirds as well as supporting robust tourism and recreation activities.

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[11] RCW 43.143.010; RCW 90.58.160.
[12] RCW 90.58.
[13] RCW 90.48.
[14] RCW 70A.15.
[15] National Oceanic and Atmospheric Administration (NOAA). 2024. United States Coast Pilot 10, (5th) Edition. https://nauticalcharts.noaa.gov/publications/coast-pilot/files/cp10/CPB10_WEB.pdf [Accessed December 16, 2025].

Washington is a nationally recognized leader in oil spill prevention, planning, and response. However, no amount of planning or response resources can offset all spill risk. Any major oil spill to Washington's marine waters would have broad consequences for the region, nation, and world. An oil spill would likely close international shipping lanes and disrupt access to the Columbia River and Strait of Juan de Fuca, impact tourism and coastal recreation severely harm sensitive ecological resources and habitats, foul regional water quality, and disrupt Tribal treaty fishing and resources, including coastal archaeological sites. A major oil spill would damage important coastal industries and jobs that depend on fishing, shellfish aquaculture, and recreation. In the long term, it would undermine the ability of Washington State agencies to sustainably manage and protect the state's natural resources.

In the past, large oil spills affecting Washington's coastal marine waters have caused significant environmental damage to seabird populations and marine habitats. For example, a 1991 spill in international waters close to Washington released about 400,000 gallons of fuel oil, fouling the coastline within the Olympic National Park and Makah Reservation. The spill also killed about 10% of federally listed marbled murrelets and damaged critical kelp beds. [16] Another oil spill in 1988 released 230,000 gallons of heavy fuel oil off the Washington coast, affecting Washington, Oregon and Canadian waters and shorelines. The spill killed about 55,000 seabirds and closed multiple fisheries in the region.[17] Closures and fisheries impacts have direct economic as well as cultural and food security impacts to Treaty Tribes. These large spills are also costly and time consuming for Washington and federal responders. Petroleum products are environmental toxins and damage the environment in a variety of ways:

- Acute toxicity - directly killing plants and animals on contact
- Mechanical injury through smothering and coating
- Persisting in the environment and causing injury through exposure over time

Oil spills would clearly interfere with the unique physical and natural conditions of Washington's Pacific Coast. The coastal zones include high ecological productivity and diversity, numerous important and sensitive habitats and wildlife species, and geological hazards. For example:

- Washington's Coast has strong coastal upwelling, riverine inputs, and coastal eddies, which drives a highly productive marine ecosystem along the continental shelf break and the nearshore.
- A diverse range of habitats are present throughout the area, including offshore islands, kelp forests, rocky reefs, rocky intertidal, sandy beaches, and submarine canyons.
- These habitats support abundant wildlife such as deep-water corals and sponges; seabird colonies that are among the largest in the continental United States; 29 species of marine mammals, including sea otters, humpback and gray whales, and resident and

[16] The Tenyo Maru Oil Spill Natural Resource Trustees. 2000. Final Restoration Plan and Environmental Assessment for the Tenyo Maru Oil Spill. www.gc.noaa.gov/gc-rp/ten-rpf1.pdf [Accessed December 16, 2025].
[17] Department of Ecology, 2025, The Nestucca. ecology.wa.gov/blog/december-2020/the-nestucca [Accessed December 11, 2025].

transient orcas; and recreationally, commercially and culturally valuable fish species including salmon and shellfish (e.g. crab, shrimp, oysters, and clams).

- In addition to resident wildlife, several federal species of marine mammals and turtles listed under the federal Endangered Species Act and many diverse bird species use coastal Washington for critical migratory habitat.

Our unique and sensitive resources along Washington's outer coast have been recognized by various management designations, including the Olympic Coast National Marine Sanctuary, numerous National Wildlife Refuges, Washington's Seashore Conservation Area, and Olympic National Park's wilderness coastline -- the longest stretch of undeveloped coast in the contiguous United States – is part of the Daniel J. Evans Wilderness Area and is recognized as a UNESCO world heritage site.

Impacts on migratory species

Oil and gas leasing and development activities—including exploration, construction, and operations—pose other risks to the marine environment. If new activities were to occur off the coast of California, they would pose indirect threats to Washington resources. These activities damage habitats, dangerously alter the acoustic environment of marine animals like whales and dolphins; and introduce noise and lighting changes which can alter, injure, or damage migratory marine species.

Some areas proposed for lease sale may be relatively distant from our state. Regardless, Washington's marine environment and fishing communities are connected ecologically and economically and are potentially at risk from their development. As previously outlined, the California Current Large Marine Ecosystem is a connected ecosystem. The northern end of the California Current is seasonally one of its most productive areas, drawing in fish, marine mammals, and seabirds from the south and west. As marine heat waves become more frequent and lead to greater habitat compression, interactions between whales, prey species and humans have increased. Maintaining viable habitats free from additional stressors is exceedingly critical for the viability of those species.

As part of this dynamic, Washington's commercial fisheries are tied to the ocean habitats of California through the movement of wildlife species and fishing vessels. For example, the valuable At-Sea whiting fishery is homeported in Seattle and Newport, Oregon, but in recent years, the fleet has fished largely near the California-Oregon border and is seeking authorization to process their fish even further south. When fishing occurs more to the north, the fishery remains dependent on the waters off California. Whiting migrate from the south to north throughout the season, and more so as they mature, with spawning thought to occur in the south. Pacific sardine provide a similar case. It is a boom-bust type population. Spawning in southerly areas is likely to produce the next boom and bring the directed fishery back to the Pacific Northwest. In the wake of the devastating Deepwater Horizon oil spill in the Gulf of Mexico, polycyclic aromatic hydrocarbons in petroleum products adversely affected the development of larvae which depressed commercially and recreationally valuable fish populations. Many West Coast species exhibit sporadic recruitment meaning one or two strong

year classes can disproportionally support the population and commercial and recreational fishing. The Dungeness crab fishery is another multi-state fishery with many operators holding multiple licenses to harvest crab across two or all three West Coast states. Dungeness crab are likely a panmictic population[18], so any impact in California waters could be transferred along the entire coast.

Connections can exist even for species such as China rockfish that do not move much as adults. China rockfish occupy shallow, rocky habitats that are unevenly distributed and can be separated by long distances along the West Coast. A study of the currents when the fish are in their larval stage suggests that fish spawning in northern Washington can populate habitats in southern Oregon and vice versa. In this manner, the populations of China rockfish and similar species in the marine waters along the West Coast are connected in ways not well understood. Washington, Oregon, and California have worked collaboratively to rebuild several rockfish stocks, and fishing communities made many sacrifices to do so. Yelloweye rockfish have been the last fish species to be rebuilt and should be declared restored this summer. We would not want to see this achievement reversed by oil spills.

Washington's marine habitats and fisheries are also connected to California and Oregon marine ecosystems. The newly formed West Coast Take Reduction Team is working cooperatively to address the entanglement of humpback whales in the sablefish pot fishery. This fishery is important to all three West Coast states and whales also migrate and use habitats throughout the California Current. Shipping traffic associated with oil and gas activities increases the risk of whale ship strikes. The additional take of whales could also lead to more comprehensive conservation measures, which would threaten multiple fisheries that also incidentally interact with whales. Short-tail albatross and leatherback sea turtles are two other endangered species that also use habitats inside and outside the proposed lease sale areas.

Marine mammals important to Washington also utilize the proposed lease areas off California, including the endangered Southern Resident killer whale population. With fewer than 80 individuals left, they occupy the outer coast for much of the year, foraging and traveling as far south as Monterey Bay, California. NOAA Fisheries identify critical habitat to include 15,910 square miles of marine waters from the U.S.-Canada border to Point Sur, California. These whales are suffering due to a decline in salmon populations, acoustic disturbance in the ocean, and contaminants in the marine environment. There could be considerable spatial and temporal overlap with proposed drilling activities. Exploration, construction and drilling activities would alter the physical and acoustic environment, disrupt the whales' movement and impact their ability to forage and communicate. In a population where the preventable loss of one individual could be the tipping point toward extinction, an oil spill or "take" could not only prevent the recovery of the population but actively drive them to extinction. The 1989 Exxon Valdez oil spill in Alaska led to the functional extinction of the Chugach population of killer whales.

[18] O'Malley KG, Corbett K, Beacham TD, Jacobson DP, Jackson TM, Roegner GC. Genetic Connectivity of the Dungeness Crab (*Cancer magister*) Across Oceanographic Regimes. J Shellfish Res. 2017 Aug;36(2):453–64.

Climate impacts and affordability

In addition to the potential impacts, we have already described the climate implications that would result from the proposed oil and gas leasing program cannot be ignored. The development and consumption of fossil fuels have already resulted in climate change impacts threatening the health, safety, and livelihoods of Washingtonians. Increasingly frequent and severe coastal floods, sea level rise, saltwater intrusion, droughts, extreme heat, and wildfire are putting people and communities in every part of our state at risk, resulting in growing threats to lives, property, critical infrastructure, and overall health and wellbeing. The continued development and consumption of fossil fuels will exacerbate these threats and create greater challenges for our state.

Washington faces five major impacts from fossil fuel-driven climate change:

- **Drought**: Washington relies on its mountain snowpack as a natural reservoir, but climate change, driven by greenhouse gas emissions from fossil fuels, has already reduced the state's snowpack by 25% since 1950, and projections show a 40% to 60% decline by the end of the century[19,20,21]. Diminished snowpack has contributed to increasingly frequent droughts—six in the past decade alone[22] -- that put the state's agricultural economy, communities, ecosystems, and energy systems at risk. In 2024, total in-state hydroelectric power generation was down nearly 33% from its peak due to drought, and the Grand Coulee Dam, among the largest hydroelectric power plants in the world, generated only half of its record power output[23].
- **Marine and coastal changes**: Washington's average sea level has risen by 4 inches since 1930 and is projected to rise another 1.5 to 2.5 feet by the end of the century[24,25]. Combined with king tides and stronger, more frequent storms, our coastal communities and critical infrastructure like roads, wastewater treatment facilities, and energy networks are at risk. Meanwhile, ocean acidification and warmer waters are already harming the state's shellfish industry and threatening other culturally and economically

[19] Casola, J. H., Cuo, L., Livneh, B., Lettenmaier, D. P., Stoelinga, M. T., Mote, P. W., & Wallace, J. M. (2009). Assessing the impacts of global warming on snowpack in the Washington cascades. Journal of Climate, 22(10). doi.org/10.1175/2008JCLI2612.1 [Accessed December 16, 2025].
[20] Hegewisch, K.C. and Abatzoglou, J.T. (2024, July 12). 'Future Boxplots' web tool: Climate Toolbox. https://climatetoolbox.org/
[21] Abatzoglou, J. T., & Brown, T. J. (2012). A comparison of statistical downscaling methods suited for wildfire applications. International Journal of Climatology, 32(5).
[22] ecology.wa.gov/water-shorelines/water-supply/water-availability/statewide-conditions/drought-response [Accessed December 16, 2025].
[23] EIA. 2025. Washington State Energy Profile. www.eia.gov/state/print.php?sid=WA#23 [Accessed December 16, 2025].
[24] National Oceanic and Atmospheric Administration. (2024, July 26). Relative Sea Level Trend; 944980 Friday Harbor, Washington. Tides and Currents. tidesandcurrents.noaa.gov/sltrends/sltrends_station.shtml?id=9449880 [Accessed December 16, 2025].
[25] Miller, I., Morgan, H., Mauger, G., Weldon, R., Schmidt, D., Welch, M., & Grossman, E. (2018). Projected sea level rise for Washington State—A 2018 assessment. In Washington Coastal Resilience Project.

important species like crabs and salmon[26]. Marine heatwaves and algal blooms have led to a $641.1 million (in 2022 dollars) reduction in commercial fishing revenue on the West Coast[27]. There has been an increase in the area and duration of low oxygen, or hypoxic, conditions along the continental shelf[28] rivaling the Mississippi River "dead zone" in the Gulf of Mexico.

- **Flooding**: Warmer temperatures mean less snow and more rain during winter months. By the end of the century, the largest storms will bring 22% more rain on average,[29]leading to more frequent and severe flooding, putting communities, ecosystems, and working lands along Washington's rivers at greater risk of damage and destruction. The stakes are high. As of 2023, an estimated 2 million Washingtonians live in identified flood zones and the total value of structures in these areas exceeds $86 billion[30].
- **Extreme heat**: A "hot day" is one where the daily high temperature is in the top 1% of past high temperatures for June through August. In the past, Washington has averaged about one hot day a year, but climate change is projected to increase this number to between 11 and 127 hot days per year[31]. Extreme heat endangers public health, worsens air quality from pollutants like ozone, and threatens the economic viability of sectors relying on outdoor labor such as agriculture and forestry. In 2021, an extreme heat event hit the Pacific Northwest and killed 126 Washingtons due to preventable, heat-related causes[32].
- **Wildfire and smoke**: Warmer temperatures and less summer rainfall are projected to create conditions ripe for more frequent and severe wildfires, particularly in central and eastern Washington. Other factors, such as pests and invasive species outbreaks driven by warmer temperatures have exacerbated these risks and resulted in 60% stand-level mortality over large areas of forest land[33]. Wildfire destroys property, infrastructure,

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[26] Chang, M., L. Erikson, K. Araújo, E.N. Asinas, S. Chisholm Hatfield, L.G. Crozier, E. Fleishman, C.S. Greene, E.E. Grossman, C. Luce, J. Paudel, K. Rajagopalan, E. Rasmussen, C. Raymond, J.J. Reyes, and V. Shandas. (2023). Ch. 27. Northwest. In: Fifth National Climate Assessment. Crimmins, A.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, B.C. Stewart, and T.K. Maycock, Eds.

[27] Bellquist, I, V. Saccomanno, BX Semmens, M Gleason, and J Wilson, 2021: The rise in climate change-induced federal fishery disasters in the United States. PeerJ, 9, e11186.

[28] Barth JA, Pierce SD, Carter BR, Chan F, Erofeev AY, Fisher JL, et al. Widespread and increasing near-bottom hypoxia in the coastal ocean off the United States Pacific Northwest. Sci Rep. 2024 Feb 15;14(1):3798.

[29] Warner, M. D., Mass, C. F., & Salathé, E. P. (2015). Changes in winter atmospheric rivers along the North American west coast in CMIP5 climate models. Journal of Hydrometeorology, 16(1). doi.org/10.1175/JHM-D-14-0080.1 [Accessed December 16, 2025].

[30] Washington State Enhanced Hazard Mitigation Plan, 2023. https://mil.wa.gov/enhanced-hazard-mitigation-plan [Accessed December 16, 2025].

[31] Abatzoglou, J. T., & Brown, T. J. (2012). A comparison of statistical downscaling methods suited for wildfire applications. International Journal of Climatology, 32(5).

[32] Vogel, J., J. Hess, Z. Kearl, K. Naismith, K. Bumbaco, B.G. Henning, R. Cunningham, N. Bond. 2023. In the Hot Seat: Saving Lives from Extreme Heat in Washington State. Report prepared by the University of Washington's Climate Impacts Group, UW's Center for Health and the Global Environment, the Washington State Department of Health, the Office of the Washington State Climatologist, and Gonzaga University's Center for Climate, Society & the Environment.

[33] Fifth National Climate Assessment.

and habitats, while the smoke they produce spreads across the state, degrading air quality and putting public health at risk.

These climate change impacts are already affecting people and communities in Washington which would be made worse by the continued development and consumption of fossil fuels. The most important action we can take to make our state more resilient to climate impacts is reducing the use of fossil fuels.

There are serious concerns about energy affordability resulting from potential offshore oil and gas activities. Consumers are experiencing rising energy costs, causing economic hardship. Policies would exacerbate this situation should be avoided. The development of offshore oil and gas resources poses significant risks and challenges that can adversely affect consumer energy prices. Offshore drilling demands substantial investment, including exploration, drilling, and infrastructure, leading to increased operational costs that ultimately burden consumers. Moreover, the stringent environmental regulations necessary to minimize ecological risks will add further financial strain. As these compliance costs rise, they translate into higher consumer prices, undermining the economic justification for offshore development. Additionally, these operations are subject to global oil and gas market fluctuations driven by geopolitical tensions and supply disruptions, which can then lead to volatile and elevated consumer pricing. In the end, the environmental risks and potential harm to coastal communities and consumers far outweigh the speculative economic benefits.

In conclusion, oil and gas exploration and production off the western Pacific Coast is in conflict with our state's vision for a sustainable, prosperous future. We are committed to managing and protecting healthy marine ecosystems and the jobs and communities that rely on them. We strongly oppose any new oil and gas leasing and related activities in the Pacific Region of the National Outer Continental Shelf Oil and Gas Leasing Program.

Sincerely,

Casey D. Sixkiller, Director
Department of Ecology

Dave Upthegrove, Commissioner of Public Lands
Department of Natural Resources

Kelly Susewind, Director
Department of Fish and Wildlife

Diana Dupuis, Director
State Parks