

Heal the Bay

1444 9th Street
Santa Monica CA 90401

ph 310 451 1550
fax 310 496 1902

info@healthebay.org
www.healthebay.org

Dr. Walter Cruickshank
Acting Director
Bureau of Ocean Energy Management
1849 C Street, NW
Washington, D.C. 20240

March 9, 2018

Re: Comments on the 2019 – 2024 National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program [BOEM-2017-0074] – Opposition to New Leasing

Dear Dr. Cruickshank:

On behalf of Heal the Bay, an environmental nonprofit dedicated to making the coastal waters and watersheds of greater Los Angeles safe, healthy, and clean, we are strongly opposed to the expansion of oil and gas activities in the Pacific and other regions listed in the Draft Proposed 2019-2024 National Outer Continental Shelf Oil and Gas Leasing Program (Draft Proposed Program).

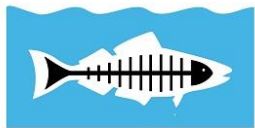
Heal the Bay respectfully urges the Bureau of Ocean Energy Management to abandon its wasteful scoping and planning efforts for the Draft Proposed Program and related Programmatic Environmental Impact Statement (PEIS). We are opposed to new leasing in the Pacific (2 lease sales each for Northern California, Central California, and Southern California, and 1 for Washington/Oregon), the Atlantic (3 lease sales each for the Mid- and South Atlantic, 2 for the North Atlantic, and 1 for the Straits of Florida), the Gulf of Mexico (2 lease sales), and all waters off Alaska (19 lease sales) and urge you to offer no new oil and gas leases in federal waters.

The Administration's proposal to expand offshore drilling to nearly all U.S. waters, encompassing over 90% of total Outer Continental Shelf acreage – the largest number of potential offshore lease sales ever proposed – is shortsighted and reckless. Offshore oil and gas drilling is inherently dangerous, and threatens the nation's ocean economy and environment. We have seen the damage that oil spills cause by closing fisheries and tourist attracting beaches, killing wildlife, threatening public health, and destroying healthy ecosystems.

In 1969, a well blowout off the Santa Barbara coastline pumped nearly 4 million gallons of crude oil into the Pacific and onto the beaches of Southern California. Since then, local lawmakers and Californians have worked tirelessly to prevent spills and leaks from ruining our environment and \$18 billion coastal economy by rejecting any new oil and gas drilling leases offshore in state and federal waters.

More recently, a ruptured pipeline spewed over 100,000 gallons of crude oil onto the biologically diverse Santa Barbara coastline 2015, just west of Refugio State Beach, with an estimated 21,000 gallons reaching the water. The Refugio spill killed hundreds of ocean creatures, closed popular beaches for weeks and shut down fisheries for 138 square miles, severely impacting the area's commercial and recreational anglers.¹

¹NOAA DARRP Refugio Beach Oil Spill Website: <https://darrp.noaa.gov/oil-spills/refugio-beach-oil-spill>



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Moving forward with the Draft Proposed Program and PEIS would undermine the deep investment that California and other states have made to enhance their coastal ecosystems and economies. California has devoted extensive resources to clean up water quality, restore wetlands, establish marine protected areas, and restore coastal habitat. Over the past few decades, the Santa Monica Bay has greatly rebounded from severely degraded water quality and declining marine life populations, due in large part to the upgrade of sewage treatment practices, improved fisheries management, coastal and marine habitat restoration, and the designation of Santa Monica Bay as a National Estuary.² The success of Marine Protected Areas along California's coast proves that making smart investments that protect our environment can benefit fisheries and tourism, while preserving ecological habitats.³ New offshore oil and gas development would require the construction of platforms, offshore and onshore pipelines, and other support infrastructure likely to significantly harm coastal resources, thereby putting California's vibrant coastal environment and economy at risk of future spills.

We urge BOEM to carefully consider the following recommendations for the 2019-2024 Draft Proposed Program:

Inadequate Public Process: The Draft Proposed Program process has failed to provide sufficient time or opportunity to engage for public review and comment. Few public meetings were held (only one in California, in the non-coastal location of Sacramento), and no formal forum was provided for public comment at the National OCS Program Public Meeting in Sacramento on Feb. 8, 2018. If the PEIS process moves forward, we urge BOEM to hold scoping meetings in all of the municipalities that have weighed in with concern about the Draft Proposed Program.

Avoid All Protected Areas: There are a number of federally and state designated protected areas off California's coast and beyond. We strongly urge BOEM to remove any lease areas that contain or are adjacent to State⁴ and Federal⁵ Marine Protected Areas, Areas of Special Biological Significance⁶, National Estuary Program Areas⁷, National Estuarine Research Reserves⁸, Marine National Monuments⁹, and/or National Marine Sanctuaries¹⁰ from consideration in the Draft Proposed Program. This includes both of the California lease areas contained within the Draft Proposed Program. These areas uniquely designated for their valuable wildlife and habitats.

² Urban Coast: State of the Bay (2015): http://www.santamonicabay.org/wp-content/uploads/2016/01/UrbanCoast_5.1_State-of-the-Bay-Report_revised_lower-res-1.pdf

³ A Decade of Protection, 10 Years of Change at the Channel Islands: https://labs.eemb.ucsb.edu/caselle/jennifer/sites/labs.eemb.ucsb.edu.caselle.jennifer/files/pubs/ci_10-yr_brochure_web.pdf.

⁴ California Marine Protected Areas: <https://www.wildlife.ca.gov/Conservation/Marine/MPAs>

⁵ Channel Islands Marine Protected Areas: <https://channelislands.noaa.gov/marineres/welcome.html>

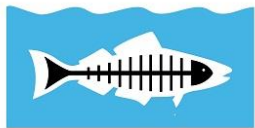
⁶ California Areas of Biological Significance: https://www.waterboards.ca.gov/water_issues/programs/ocean/asbs.shtml

⁷ National Estuary Program Areas: <https://www.epa.gov/nep>

⁸ National Estuarine Research Reserves: <https://coast.noaa.gov/nerrs/>

⁹ Marine National Monument Areas: http://www.fpir.noaa.gov/MNM/mnm_index.html

¹⁰ National Marine Sanctuary Areas: <https://sanctuaries.noaa.gov/>



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Allowing oil and gas development in such regions would threaten the sensitive and significant natural resources that reside within these areas.

Waste and Unreasonable Water Use: The California State Water Resources Control Board has regulations and policies in place to prohibit wasteful water reuse practices.¹¹ Certain types of oil and gas development require large amounts of water. The Draft Proposed Program does not consider wasteful and unreasonable water use. If BOEM proceeds with the PEIS scoping efforts, we recommend a careful analysis and determination of impacts to water resources, both water quality and supply. Any findings and recommended actions should be made in accordance with California water regulations and policies.

No Action Alternative: If BOEM proceeds with a PEIS scoping process for the Draft Proposed Program, we urge the Bureau to consider a “no action” alternative to exclude new lease sales in the Pacific, Atlantic, Eastern Gulf of Mexico, Pacific and Alaska regions. Analysis of such alternative is required under the California Environmental Quality Act and National Environmental Policy Act.

Our nation should be rapidly transitioning away from fossil fuels and toward renewable energy sources, yet the Draft Proposed Program would vastly expand offshore oil and gas development. This program would be a disaster for our climate, and commit our nation to continuing dependence on dirty fossil fuels for decades to come. The Draft Proposed Program will harm public health and the environment, and is inconsistent with the federal government’s duties under the Outer Continental Shelf Lands Act to ensure offshore oil and gas development is balanced “with protection of the human, marine, and coastal environments,” and consistent with “national needs.”¹²

At a time when clean renewable energies, such as solar and wind, are steadily growing, it is inconsistent with industry trends and the best interest of Americans, to threaten our ocean environment and economy through unjustified oil and gas exploration. We appreciate the opportunity to comment on this very important matter.

Sincerely,

Shelley Luce
President and CEO

Sarah Abramson Sikich
Vice President

¹¹ California State Water Resources Control Board Waste and Unreasonable Water Uses:

https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/reg/wasteful_water_uses.html

¹² Outer Continental Shelf Lands Act 43 U.S.C. §§ 1802(2); 1332(3)