



PROMOTING THE PROTECTION, CONSERVATION AND RESTORATION OF NATURAL FOREST ECOSYSTEMS AND THEIR PROCESSES ON THE OLYMPIC PENINSULA, INCLUDING FISH AND WILDLIFE HABITAT, AND SURROUNDING ECOSYSTEMS

March 9, 2018

Ms. Kelly Hammerle
National Program Manager
Bureau of Ocean Energy Management
U.S. Department of Interior

Submitted electronically

RE: Opposition to the Draft Proposed OCS Oil & Gas Leasing Program No. BOEM-2017-0074

Dear Ms. Hammerle,

The Olympic Forest Coalition writes to express strong opposition to BOEM's Draft Proposed 2019-2024 OCS Oil and Gas Leasing Program. The expansion of offshore oil drilling in the Pacific Planning area, including Washington State and the Olympic Peninsula, will cause significant negative impacts to the marine ecosystems, threatened and endangered species, coastal communities, and vital recreation and tourism industries in our area. We understand that, per discussion between Lorna Smith, Olympic Forest Coalition Vice President, and Ms. Kelly Hammerle, National Program Manager on March 7, 2018, that our organization has been advised we may combine comments on both the NEPA Scoping for BOEM's Draft Proposed 2019-2024 OCS Oil and Gas Leasing Program and the Programmatic Plan itself in one letter. Please consider the following comments to serve that dual purpose. Our organization requests that the comment period be extended 60 Days to allow for sufficient time to review the scope of the program and the programmatic EIS and provide further comments.

Offshore oil and gas development in new areas will require exploration and operations activities such as seismic surveys, drilling operations, oil transport by tankers, and the installation of platforms, pipelines, and other infrastructure. Collectively these activities would significantly damage the environment, marine wildlife, and coastal economies and ways of life. New offshore drilling would also expose the marine environment and coastal communities to the risks of another catastrophic oil spill. According to the Surfrider Foundation, oil and gas companies have claimed that improvements in technology have greatly reduced the likelihood of a spill, yet between 2006 and 2015, 389 oil spills occurred from OCS platforms and pipelines (not counting associated vessels and barges), tarnishing U.S. coastlines with roughly 206.5 million gallons of oil.

Washington's marine waters and shores are home to threatened and endangered species, native fish and shellfish fisheries that will be impacted by exploration and extraction activities. The BOEM's Draft Program identifies the "critical habitats" of several endangered and threatened species at risk in Washington's marine waters. Marbled murrelets and western snowy plover, orcas, steelhead and salmon, green sturgeon, and leatherback turtle's habitats are at risk under the Plan.

The 2016 Periodic Status Review on the Marbled Murrelet prepared by the Washington Department of Fish and Wildlife provides information that should be included in the programmatic EIS.¹ At-sea population monitoring from 2001 to 2015 indicated a 4.4% decline in the murrelet population annually, which represents a 44% reduction since 2001. The 2015 population estimate for Washington is about 7,500 birds. The species was listed as threatened in 1992 under the U.S. Endangered Species Act in Washington, Oregon and California, primarily due to loss of old forest nesting habitat from commercial timber harvesting and *mortality associated with net fisheries and oil spills (USFWS 1992)*. [emphasis added]. The Plan area identifies the marbled murrelet marine waters as “critical habitat,” however it does not appear to cumulatively identify the risks. For example, Marbled Murrelets prey primarily on forage fish such as Pacific herring, northern anchovy, eulachon, Pacific sand lance, surf smelt, juvenile rockfish salmon. Fish regularly comprise 60-100% of the diet. The Plan does not adequately identify the potential risks to prey fish for the marbled murrelet.

Cumulative impacts of industrial forestry and climate change as well as the potential impacts from oil drilling exploration and operation are not considered cumulatively in the Plan. For example, the scoring for climate change impacts analyze the marine waters impacts and do not consider the land based and marine waters changes cumulatively, and therefor seriously underestimate the cumulative impacts of climate change. The Plan identifies increased military operations in planning areas, but does not consider the cumulative impacts of all activities on threatened and endangered species. The Plan does not include requiring analysis of the weather pattern changes. Unusually severe weather in the region, combined with a fetch of thousands of miles allowing buildup of heavy seas within short periods would contribute significantly to the odds of equipment malfunction, would also result in an inability for emergency response crews to reach these sites during an inevitable spill.

The Plan indicates it will exclude national marine sanctuaries from the program. However, it does not adequately identify nor evaluate the risks to the marine sanctuary from exploration and operations adjacent to the sanctuary. The Olympic Coast National Marine Sanctuary includes 3,188 square miles of marine waters off the Olympic Peninsula. Additionally, the Plan does not identify the risks to federal nor state parks located in the Plan area. The Olympic National Park extends to the coast line in Washington state, including several miles of beach between Ruby Beach and South Beach, including the Klaloch camping area. The Park is an important habitat, and driver of the recreation industry. Washington state has 11 state parks along the Pacific coast area. While these areas overlap the Marine Sanctuary, the Plan does not adequately protect these important areas form impacts of adjacent exploration and extraction activities adjacent. The Plan should include exclusion zones adjacent to the Olympic National Marine Sanctuary, the Olympic National Park, and the state parks, adequate to protect the environment, wildlife, and reactional economy from impacts of exploration and operations.

Washington’s Department of Natural Resources elected Commissioner of Public lands has opposed the offshore drilling. DNR estimates that the economic impacts to the shellfish industry from accidents potentially would affect the 50,000 people employed by the \$150 million annual income industry. Dungeness crab fishery generates an additional \$82 million annually. The US government has entered into treaties with four tribal nations that require protection of their fishing rights. Impacts on tribal rights are inadequately identified in the Plan.

The Olympic Forest Coalition joins the Surfrider Foundation in its opposition because of the likely negative impact on coastal economy. The Foundation research shows that there are several important economic industries depending on the healthy marine ecosystem. These industries include tourism and recreation, which generate billions of dollars for coastal states and the nation as a whole. Coastal recreation and tourism accounts for 83 percent of establishments and 71 percent of employment

¹ <https://wdfw.wa.gov/publications/01827/wdfw01827.pdf>.

opportunities for coastal communities in the United States. The Surfrider Foundation's 2015 Recreational Use Study found that the Washington coast attracted 4.1 million trips in a single year, resulting in \$481 million from direct expenditures to our state's coastal economy. These coastal recreation opportunities depend on clean beaches and waters, abundant wildlife, and scenic view sheds – all of which would be compromised by the expansion of offshore drilling. A spill would cause catastrophic impacts to these coastal communities, with major disasters resulting in 25 percent of small businesses unable to re-open.

Our organization requests that the plan be withdrawn and the Bureau of Ocean Energy Management undertake an evaluation that adequately analyzes the cumulative impacts to the environment, coastal communities, and existing industries from drilling operations and large oil spills, considers alternatives to offshore drilling, and establishes adequate exclusion zones for important marine and economic resources.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in blue ink that reads "Connie Gallant". The signature is fluid and cursive.

Connie Gallant, President

A handwritten signature in blue ink that reads "Lorna Smith". The signature is fluid and cursive.

Lorna Smith, Vice President