

350 South Florida * Acadia Institute of Oceanography * Age of Aquarius * Alaska Wilderness League * American Bird Conservancy * Animal Welfare Institute * Apalachicola Riverkeeper * Assateague Coastal Trust * Banks Books Bookkeeping Service * Bayshore Regional Watershed Council * Beach Avenue Hospitality * Born Free USA * Brunswick Environmental Action Team (BEAT) * C.O.A.S.T. Alliance * California Coastkeeper Alliance * CalWave Power Technologies * Cape Fear Economic Development Council * Cape Hospitality Group LP * Cape Investment Management * Cape May County Chamber of Commerce * Cape May Stage * Cape May Whale Watcher, Inc. * Center for a Sustainable Coast * Cetacean Society International * Chamber of Commerce * Chesapeake Climate Action Network * Chukchi Sea Watch * Citizens Climate Lobby, Lower DE * Citizens For Responsible Oil and Gas (CFROG) * Citizens Protecting the Atlantic Coast (CPAC) * City of New Smyrna Beach * Clean Water Action * Climate Action Alliance of the Valley * COAST Alliance * Coastal Carolina River Watch * Coastal Carolina Riverwatch * Coastal Carolina Riverwatch * Collier County Waterkeeper * Conservation Voters of South Carolina * CONTACT Cape-Atlantic * Cortech Solutions, Inc. * Croc's 19th Street Bistro * Crystal Coast Waterkeeper * Defenders of Wildlife * Delaware Electric Vehicle Association * Delaware Mobile Surf, Fisherman (DMS) * Dogwood Alliance * Dragons Lair Mini Golf * Emerald Coastkeeper, Inc. * Environmental Caucus, California Democratic Party * Environmental Center of San Diego * Environmental Defense Center * Escape NJ, LLC * Fairbanks Climate Action Coalition * Florida Wildlife Federation * Georgia Conservancy * Gotham Whale * Grassy Sound Marina Operations, LLC * Greater Ocean City, MD Chamber of Commerce * Greater Wildwood Hotel and Motel Association * Green America * Group for the East End * Hackensack Riverkeeper * Hampton Roads Sowers of Justice * Hands Across the Sand * Hawk Haven Vineyard * Heal the Bay * Humane Society Legislative Fund * Inland Ocean Coalition * Interfaith Partners for the Chesapeake * Interfaith Power & Light, MD.DC.NoVA * Interfaith Power & Light, Virginia * International Marine Mammal Project of Earth Island Institute * Jenkinson's Aquarium * Lynnhaven River NOW * Marine Conservation Institute * Marine Mammal Alliance Nantucket * Matanzas Riverkeeper * Mid Atlantic Center for the Arts & Humanities * Middlesex County Regional Chamber of Commerce & Convention & Visitors Bureau * National Parks Conservation Association * NC League of Conservation Voters * New Jersey Environmental Lobby * New Jersey Restaurant and Hospitality Association * NextGen America * North Carolina Business Council * North Carolina Coastal Federation * NY/NJ Baykeeper * NY4Whales * Ocean Conservation Research * Ocean Property Management Corp. * Oceana * One Hundred Miles * Outdoor Outreach * Pacific Environment * Paradise Oceanfront Motel * Physicians for Social Responsibility * Pinelands Preservation Alliance * Preserve Calavera * Progress Florida * Progressive Democrats of Sussex County * ReThink Energy Florida * ROFFS™ * SandyHook SeaLife Foundation (SSF) * Save Our Sea NC * Save Our Shores * Save the Manatee * Saving Wildlife Project * Sea Turtle Conservancy * Seeding Sovereignty * Servpro of Cape May & Cumberland Counties * Seven Circles Foundation * Sierra Club, Calusa Group * Sierra Club, Miami Group * SODA (Stop Offshore Drilling in the Atlantic) * Solana Beach ECO Rotary Club * South Carolina Coastal Conservation League * South Carolina Wildlife Federation * South Coast Lodging Corp. * St. Johns Riverkeeper * Suncoast Waterkeeper * Surfrider Foundation * Surfrider Foundation, Cape Fear Chapter * Surfrider Foundation, Emerald Coast Chapter * Surfrider Foundation, Outer Banks Chapter * Tampa Bay Waterkeeper * TerraScapes Environmental * The Dolphin Project * The Flanders Hotel * The Greater Wildwoods Tourism Improvement and Development Authority * The TerraMar Project * The Wetlands Institute * The Wilderness Society * Trueform * Virginia Clean Cities * Virginia League of Conservation Voters * Whale and Dolphin Conservation * White Oak-New Riverkeeper Alliance * Window Genie of South Jersey * World Animal Protection

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

March 9, 2018

Dear Dr. Cruickshank:

On behalf of our millions of collective members and supporters, we respectfully urge the Bureau of Ocean Energy Management to abandon its ill-conceived efforts to develop the 2019-2024 National Outer Continental Shelf (OCS) Oil and Gas Leasing Program, and on scoping for the related Programmatic Environmental Impact Statement (PEIS).

The Administration's radical proposal to expand offshore drilling to nearly all U.S. waters, encompassing over 90 percent of total OCS acreage – the largest number of potential offshore lease sales ever proposed – is shortsighted and wrong.

The final 2017-2022 program was developed over three years and incorporated millions of comments from the public, scientists, industry, business owners and other stakeholders. The exclusion of the Arctic, Atlantic and Pacific Oceans, and Eastern Gulf of Mexico reflected the significant economic, social and environmental risks posed by oil and gas development in those areas, as well as strong community opposition. Additionally, local and regional concerns over offshore oil and gas activities have only grown since the 2017-2022 program was finalized, with more than 200 municipalities formally opposed to offshore drilling and/or exploration.

If the Bureau moves forward, ignoring the opposition, it should exclude all areas in the Atlantic, Pacific, Alaska, and Eastern Gulf of Mexico planning areas, including any areas within national marine sanctuaries or marine national monuments, from the proposed 2019-2024 Outer Continental Shelf (“OCS”) Oil and Gas Leasing Program.

The United States must transition away from harmful fossil fuels and towards responsibly sited renewable energy—like offshore wind power—to supply our nation's energy needs and mitigate climate change. Expanding offshore oil and gas development is the wrong strategy as it will not only harm our nation but also the world. The risks posed to coastal communities and fragile marine ecosystems in the United States are too great, especially when the benefits of conserving these areas are fully considered.

Expanding offshore oil and gas activities in the Atlantic, Pacific, Alaska, or Eastern Gulf of Mexico will threaten coastal and marine environments, as well as the local economies that depend on them. Offshore oil and gas exploration activities—such as high-intensity geophysical seismic surveys, drilling operations, and increased ship traffic—threaten marine and coastal wildlife, including endangered and protected species, as well as coastal communities. Developing oil and gas in new marine areas would require the construction of platforms, offshore and onshore pipelines, and other support infrastructure likely to significantly harm coastal resources. During the past decade alone, efforts to pursue offshore oil and gas—and the corresponding government approvals—have resulted in environmental disasters such as the British Petroleum (“BP”) Deepwater Horizon oil spill, costly lawsuits, and the diversion of government resources. Development of offshore oil and gas resources will also contribute to climate change, rising sea levels, and ocean acidification, all of which threaten the nation's coasts and marine ecosystems.

We urge the Bureau to carefully consider the following recommendations for the 2019-2024 Draft Proposed Plan (“DPP”):

1. The Bureau should abandon its costly and ill-conceived efforts to develop an unnecessary new five-year program. If the Bureau moves forward, it should not schedule new lease sales in the Atlantic Region (9 proposed), Eastern Gulf of Mexico (2 proposed), Alaska Region (19 proposed), and Pacific Region (7 proposed) in the 2019-2024 Five-Year Program.
2. The Bureau must consider all opposition to offshore oil and gas exploration and development, including opposition from business leaders, fishing groups and elected officials.

3. The Bureau must use best practices in evaluating impacts of its Five-Year Program and must update its projections to match current market conditions.
4. The Bureau should not include any protected areas such as national marine sanctuaries, marine national monuments, or other withdrawn areas in the proposed 2019-2024 Five-Year Program.

With respect to scoping for the Programmatic Environmental Impact Statement (“PEIS”), we recommend the following:

1. The Bureau should consider a “no action” alternative to exclude new lease sales in the Atlantic, Eastern Gulf of Mexico, Pacific and Alaska regions.
2. The Bureau should conduct thorough research to determine the social, economic and ecological baseline of OCS areas under consideration to adequately assess the potential impacts of resource development.
3. The Bureau must protect endangered and threatened species and consider the impacts of oil spills on marine life.
4. The Bureau must fulfill its obligations under NEPA to prepare a thorough PEIS using best available science and consider cumulative as well as direct and indirect impacts.

Finally, we believe that neither the length of time for public comments, number of meetings, nor meeting format are adequate in order to meet the public input needs the DPP requires. We urge public meetings be held in coastal communities, large and small, in all areas included in the DPP, to allow for as many impacted voices as possible to raise their concerns. At the very least, all municipalities included during the DPP comment period for the 2017-2022 program should be scheduled before moving ahead.

Sincerely,

350 South Florida	California Coastkeeper Alliance
Acadia Institute of Oceanography	CalWave Power Technologies
Age of Aquarius	Cape Fear Economic Development Council
Alaska Wilderness League	Cape Hospitality Group LP
American Bird Conservancy	Cape Investment Management
Animal Welfare Institute	Cape May County Chamber of Commerce
Apalachicola Riverkeeper	Cape May Stage
Assateague Coastal Trust	Cape May Whale Watcher, Inc.
Banks Books Bookkeeping Service	Center for a Sustainable Coast
Bayshore Regional Watershed Council	Cetacean Society International
Beach Avenue Hospitality	Chamber of Commerce
Born Free USA	Chesapeake Climate Action Network
Brunswick Environmental Action Team (BEAT)	Chukchi Sea Watch
C.O.A.S.T. Alliance	Citizens Climate Lobby, Lower DE

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Citizens Protecting the Atlantic Coast (CPAC)
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Clean Water Action
Climate Action Alliance of the Valley
COAST Alliance
Coastal Carolina River Watch
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Collier County Waterkeeper
Conservation Voters of South Carolina
CONTACT Cape-Atlantic
Cortech Solutions, Inc.
Croc's 19th Street Bistro
Crystal Coast Waterkeeper
Defenders of Wildlife
Delaware Electric Vehicle Association
Delaware Mobile Surf, Fisherman (DMS)
Dogwood Alliance
Dragons Lair Mini Golf
Emerald Coastkeeper, Inc.
Environmental Caucus, California Democratic Party
Environmental Center of San Diego
Environmental Defense Center
Escape NJ, LLC
Fairbanks Climate Action Coalition
Florida Wildlife Federation
Georgia Conservancy
Gotham Whale
Grassy Sound Marina Operations, LLC
Greater Ocean City, MD Chamber of Commerce
Greater Wildwood Hotel and Motel Association
Green America
Group for the East End
Hackensack Riverkeeper
Hampton Roads Sowers of Justice
Hands Across the Sand
Hawk Haven Vineyard
Heal the Bay
Humane Society Legislative Fund
Inland Ocean Coalition
Interfaith Partners for the Chesapeake
Interfaith Power & Light, MD.DC.NoVA
Interfaith Power & Light, Virginia
International Marine Mammal Project of Earth Island Institute
Jenkinson's Aquarium
Lynnhaven River NOW
Marine Conservation Institute
Marine Mammal Alliance Nantucket
Matanzas Riverkeeper
Mid Atlantic Center for the Arts & Humanities
Middlesex County Regional Chamber of Commerce & Convention & Visitors Bureau
National Parks Conservation Association
NC League of Conservation Voters
New Jersey Environmental Lobby
New Jersey Restaurant and Hospitality Association
NextGen America
North Carolina Business Council
North Carolina Coastal Federation
NY/NJ Baykeeper
NY4Whales
Ocean Conservation Research
Ocean Property Management Corp.
Oceana
One Hundred Miles
Outdoor Outreach

Pacific Environment
Paradise Oceanfront Motel
Physicians for Social Responsibility
Pinelands Preservation Alliance
Preserve Calavera
Progress Florida
Progressive Democrats of Sussex County
ReThink Energy Florida
ROFFS™
SandyHook SeaLife Foundation (SSF)
Save Our Sea NC
Save Our Shores
Save the Manatee
Saving Wildlife Project
Sea Turtle Conservancy
Seeding Sovereignty
Servpro of Cape May & Cumberland Counties
Seven Circles Foundation
Sierra Club, Calusa Group
Sierra Club, Miami Group
SODA (Stop Offshore Drilling in the Atlantic)
Solana Beach ECO Rotary Club
South Carolina Coastal Conservation League
South Carolina Wildlife Federation
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St. Johns Riverkeeper
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The Greater Wildwoods Tourism Improvement
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