



August 17, 2017

Submitted Via the Federal eRulemaking Portal

Walter D. Cruickshank,
Acting Director, Bureau of Ocean Energy Management
45600 Woodland Road, Mailstop VAM-LD
Sterling, VA 20166

RE: Request for Information and Comments on the Preparation of the 2019–2024 National Outer Continental Shelf Oil and Gas Leasing Program, BOEM Docket No. 2017–0050

Director Cruickshank,

Turtle Island Restoration Network (“Turtle Island”), a California nonprofit public benefit corporation, requests that you consider these comments in your review and formulation of recommendations concerning the 2019-2024 National Outer Continental Shelf Oil and Gas Leasing Program.

These comments are submitted by Turtle Island on behalf of its staff and 81,000 active members and supporters. Turtle Island is a leading advocate for the world’s endangered marine wildlife and the ocean habitats upon which it depends through hands-on conservation, research and advocacy campaigns. Since 1989, Turtle Island has worked to protect and restore populations of endangered sea turtles and the habitat, and have extended our successful strategies to safeguard endangered whales, dolphins, seals, seabirds, sharks, and fish.

The issues raised by the program development directly impact protected areas of importance to Turtle Island, whose advocacy efforts include initiatives to reform fisheries, create marine protected areas, safeguard marine and coastal watershed habitats, and build community engagement. These efforts extend from our offices in Northern California and the Gulf Coast in Texas to the waters of the Pacific off the West Coast, Hawaii and the Western Tropical Pacific, to Texas sea turtle nesting beaches and the Gulf of Mexico, to Central American nesting beaches and the Eastern Tropical Pacific Seascape, and to other key ocean habitats.

Our Executive Director is a member of the Advisory Council for the Cordell Banks National Marine Sanctuaries, and our Gulf of Mexico Campaign Director is a member of the Flower Garden Banks National Marine Sanctuaries Advisory Council.

Summary of Issues and Comments

This new 5-year plan would replace the existing plan for 2017-2022 put in place by President Obama and DOI Secretary Jewell for the Outer Continental Shelf (OCS) off the Atlantic, Gulf of Mexico, Pacific and Alaskan coastlines of the United States.

The existing Obama plan withdrew portions of the OCS along the Atlantic and Arctic coasts from development and maintained other existing withdrawals.

The RFI is the first step to implement President Trump's April 28, 2017 Executive Order 13795, "Implementing an America-First Offshore Energy Strategy," seeking a reversal of the Arctic and Atlantic Ocean withdrawals.

TIRN is committed to resisting Trump's "energy strategy" for new oil and gas development on America's OCS. The new 5-year National OCS Program is unnecessary and flawed for numerous reasons:

- Redoing the five-year Leasing Program is unnecessary and unjustified. The 2017-2022 Leasing Program was thoroughly vetted through the OCSLA and NEPA processes and just went into effect on July 1, 2017. Nothing has changed since that time to warrant revision.
- There is a scientific consensus that the amount of available fossil fuels, including those in the Arctic Ocean, far exceeds what is acceptable to develop and burn if we are to avoid the worst impacts of climate change. These resources must remain in the ground.
- The Arctic is already warming faster than the rest of the planet, and oil and gas development in the region exacerbates that warming, putting Arctic communities who are already experiencing the harmful effects of a warming planet at even greater risk.
- There is a scientific consensus that the [U.S. is unprepared and unable to clean a spill in Arctic waters](#). Spills are inevitable, and the risk is too great. Additionally, [Commandant of the Coast Guard Paul Zukunft recently stated](#), "We don't know what the long-term impacts will be to one of the most pristine environments in the world and it's not an area we would want to oil and find out after the fact."

- Last year, scientists submitted a letter to President Obama outlining the risks that Arctic Ocean drilling would have on marine ecosystems and wildlife, and calling for permanent protection of the Arctic Ocean.

The Arctic (Chukchi and Beaufort Seas Planning Areas) was withdrawn for sound reasons and should remain off limits. Additionally, during the development of the current 5-year-plan, which is intended to remain in place until 2022, over a million people asked the Department of Interior to keep the Arctic Ocean safe from offshore drilling.

Opening more drilling sites in the Gulf of Mexico is in direct opposition to the wishes of over 120 Gulf communities and restrictions on potential drilling sites is supported by the Department of Defense and Congressional representatives of both parties. Do not ignore the wishes of the communities who have the most to gain, and the most to lose from offshore drilling.

Public opinion supports environmental protection and increased renewable energy utilization over increased exploitation of natural resources.¹ Additionally, the safety recommendations of the National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling should be implemented immediately to avoid similar disasters at any current or future offshore drilling sites.

On behalf of Turtle Island's staff, members and supporters, I appreciate your consideration of these comments.

Sincerely,



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¹ http://www.gallup.com/poll/206159/americans-tilt-toward-protecting-environment-alternative-fuels.aspx?g_source=us+environment&g_medium=search&g_campaign=tiles, <http://www.pewinternet.org/2016/10/04/public-opinion-on-renewables-and-other-energy-sources/>.