



August 15, 2017

Mr. Walter Cruickshank, Director
Bureau of Ocean Energy Management
45600 Woodland Road
Sterling, VA 20166

Ms. Kelly Hammerle, Program Manager
Bureau of Ocean Energy Management
45600 Woodland Road
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RE: Request for Information for 2019-2024 Oil and Gas Leasing Program
(BOEM-2017- 0050) Submitted via Federal Internet Commenting System

Dear Director Cruickshank and Ms. Hammerle:

Thank you for the opportunity to comment on the U.S. Department of Interior's Request For Information on the five-year Outer Continental Shelf (OCS) Oil and Gas Leasing Program for 2019-2024. Our agencies oppose the inclusion of oil and gas leases on the OCS adjacent to Washington State (Washington/Oregon Planning Unit - Pacific Region). We have significant concerns about the added risks and impacts to ocean and community resources that would result from oil and gas leasing and development in our offshore waters.

History of lease sales, oil spills, and protection for Washington's coast

On Washington State's coast, a past proposed oil and gas lease sale and major oil spills prompted greater protection of the area. Major spills included the *Nestucca* (1988) and *Tenyo Maru* (1991), which spilled a combined 331,000 gallons and significantly impacted state, Canadian and Tribal resources. The federal government cancelled the pending lease sale in 1990 and designated the Olympic Coast National Marine Sanctuary in 1994, which prohibited oil and gas leasing and development. Since that time, Washington State's coast and the entire Pacific Region have not been included in any of the five-year oil and gas leasing programs.

Primary environmental impacts of oil to plants, animals, and habitats include: 1) acute toxicity - directly killing plants and animals by poisoning; 2) mechanical injury through smothering and coating; and 3) persisting in the environment and causing injury through exposure over time. Washington State has the largest commercial shellfish industry in the nation. NOAA has also recognized many of the communities along Washington's Pacific Coast as fisheries-dependent –

meaning they have much higher engagement in and reliance on this activity than other coastal communities in the region and nation. These industries represent important employers on our coastal waters and return much economic and cultural value to our citizens. These vital industries are extremely sensitive to contamination by pollutants, including oil.

Oil and gas leasing and development also pose other risks to the marine environment, including impacts of exploration (e.g. seismic testing) and construction to the physical environment, such as damaging habitats; altering the acoustic environment, which can injure or kill marine animals (whales and dolphins); and operating impacts from noise and lighting, which can alter, injure, or damage marine species.

As demonstrated by the 2010 Deepwater Horizon blowout in the Gulf of Mexico, offshore oil and gas production and development continues to carry a significant risk of explosions and catastrophic spills. Washington State is a nationally recognized leader in oil spill planning and response. However, no amount of planning or response resources could come close to mitigating the risk posed by a blowout like Deepwater Horizon. A large scale spill and/or explosion would result in significant and unavoidable damages to Washington's coastal resources and undermines the ability of our agencies to sustainably manage and protect natural resources for ongoing public benefit. This includes damage to important existing coastal industries and thousands of existing jobs such as fishing, shellfish aquaculture, and recreation.

Laws, goals and policies of the State of Washington

Oil and gas leasing, exploration, and production on the OCS is inconsistent with Washington State's laws, policies, and goals. Washington is fostering energy security and resilience by advancing the green energy economy and simultaneously combating climate change through a number of policies and initiatives. This includes adopting new regulations that will cut carbon pollution; enacting policies that accelerate the adoption of zero emission electric vehicles; continuing investments in renewable energy resources and energy efficiency to meet state mandates; and working regionally to address needs for regional infrastructure and electrical grid integration and modernization.

Furthermore, Washington State law:

- Prohibits oil and gas exploration, production, and drilling in the state's marine waters - Revised Code of Washington (RCW) 43.143.010 and RCW 90.58.160.
- Establishes state policies guiding ocean management, which are currently included as part of Washington's federally-approved Coastal Zone Management Program (CZMP), including:
 - Prioritizing ocean uses that do not adversely impact renewable resources over those that have adverse impacts to renewable resources.
 - Conserving fossil fuels.
 - Protecting existing ocean uses and ocean resources from likely, long-term significant adverse effects.
- Creates a framework for developing marine plans for Washington's waters, including addressing potential for marine renewable energy (RCW 43.372).

Washington's CZMP includes other state authorities such as the Shoreline Management Act, Water Pollution Control Act, and Clean Air Act and their associated regulations.

Marine Spatial Plan for Washington's Pacific Coast

Under state law (RCW 43.372), our agencies have spent the past five years developing a Marine Spatial Plan for Washington's Pacific Coast. The plan provides a wealth of information on the geographical, geological, and ecological characteristics and the economic, social and environmental values of Washington's Pacific Coast. Furthermore, the plan provides a framework and recommendations on evaluating new ocean uses and ensuring protection of existing uses and environmentally sensitive areas. The plan addresses potential for offshore renewable energy as an alternative to fossil fuels. More information on the plan, including data, reports, and projects is available on our planning website at www.msp.wa.gov. Some key findings from this planning process are summarized below.

Fishing, recreational, shipping, and military uses of this area are economically, culturally, and socially vital to communities on Washington's Pacific Coast. They support thousands of jobs and supply hundreds of millions of dollars to the local and state economy. These uses rely on a healthy, sustainable resources, clean water, and clean beaches. For example:

- In 2014, commercial (non-tribal) fisheries landed a total of 129 million pounds into Washington's coastal ports with an ex-vessel value of \$93 million.
- Commercial (non-tribal) fishing and primary seafood processing support 1,820 total jobs and \$77 million in total labor income in coastal counties adjacent to the MSP study area. Their total statewide contribution is 2,830 jobs and \$117 million in labor income.
- Annual recreational fishing effort in the area, between 2003 and 2014, averaged 47,000 trips on charter vessels and another 98,000 trips on private vessels. In 2014, trip-related expenditures for coastal recreational fishing generated over \$30 million in coastal spending, supported 325 jobs in coastal counties, and contributed \$17 million in labor income.
- Shellfish aquaculture in Pacific and Grays Harbor counties provides an estimated 572 direct jobs, supports 847 total jobs, and generates \$50 million in total labor income in the coastal region alone.
- Washington residents took an estimated 4.1 million trips to Washington's Pacific Coast in 2014, with nearly 60 percent indicating their primary purpose was for recreation. These trips generated an estimated \$481 million in expenditures. In the coastal study area, recreation trip-related spending by Washington residents is estimated to support 4,725 jobs and generate \$196.8 million in labor income within the coastal economy.
- Recreational razor clamming generates between 275,000 and 460,000 digger trips each season and provides between \$25 million and \$40 million in tourist-related income to coastal communities.
- This area is critical to shipping and trade, particularly ship traffic among ports along the West Coast and from ports in Washington across the Pacific Ocean to countries in Asia. The Port of Grays Harbor's marine cargo activities supports 1,524 total jobs (including 574 direct jobs) and generates over \$130 million in total income.
- Washington State hosts a large military presence with over 46,000 active duty military personnel, including 10,000 active duty Navy (2016). Due to the large military

Mr. Cruickshank and Ms. Hammerle

August 15, 2017

Page 4

installations nearby in Puget Sound, the US Navy actively trains and tests in the MSP Study Area.

Washington's Pacific Coast has unique physical and natural conditions and vulnerabilities, including geological hazards, high ecological productivity and diversity, and numerous important and sensitive habitats and wildlife.

- 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 contiguous United States; 29 species of marine mammals, including a population of reintroduced sea otters, and humpback and gray whales; and commercially and culturally valuable species such as fish (e.g. salmon) and shellfish (e.g. crab, shrimp, oysters, and clams).
- The offshore area, known as the Cascadia Subduction Zone, is geologically active and poses the highest risk for massive earthquake and tsunami in the nation.

Resources off Washington's coast are subject to a complex intergovernmental management.

- Four coastal tribes maintain treaties with the United States which 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 relationship with the both the federal government and Washington State.
- The uniqueness and sensitivity of the resources along Washington's Pacific coast has 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 - which is the longest stretch of undeveloped coast in the contiguous United States and is recognized as a UNESCO world heritage site.

We are committed to managing and protecting healthy marine ecosystems and the jobs that rely on them for Washington's coastal communities and future generations. Oil and gas leasing, exploration, and production off Washington's coast are completely at odds with our state's vision for a sustainable and prosperous future.

Sincerely,



Maia Bellon
Director
Department of Ecology



Hilary Franz
Commissioner of Public Lands
Department of Natural Resources



James Unsworth
Director
Department of Fish and Wildlife