

SANCTUARY ADVISORY COUNCIL



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February 2, 2018

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Makah Tribe
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Quinault Indian Nation
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Grays Harbor County
Washington State:
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Dept. of Fish and Wildlife
Dept. of Natural Resources
NOAA Fisheries
Olympic National Park
U.S. Coast Guard
U.S. Fish and Wildlife Service
U.S. Geological Survey
U.S. Navy*

Ms. Kelly Hammerle, Manager
National OCS Oil and Gas Leasing Program
Bureau of Ocean Energy Management (VAM-LD)
45600 Woodland Road
Sterling, VA 20166-9216

Dear Ms. Hammerle:

On behalf of Olympic Coast National Marine Sanctuary Advisory Council, I am providing comments on the Draft Proposed Five-Year Outer Continental Shelf (OCS) Offshore Oil and Gas Leasing Program for 2019 through 2024, proposed by the Bureau of Ocean Energy Management as referenced in Federal Registry Volume 83, Number 5 (Monday, January 8, 2018) Notices, pages 829-834, FR Doc No: 2018-00083¹.

Olympic Coast National Marine Sanctuary Advisory Council brings together community members, including four coastal treaty tribes and representatives from government, research, education, and industries, representing constituents who care deeply for Olympic Coast National Marine Sanctuary and the coast of Washington. The advisory council is committed to supporting Olympic Coast National Marine Sanctuary and promoting the mission of the Office of National Marine Sanctuaries to identify, protect, conserve, and enhance the natural and cultural resources, values, and qualities of the national marine sanctuary system for this and future generations.

In keeping with this mission and on behalf of Olympic Coast National Marine Sanctuary Advisory Council, I request that you remove marine waters along the Pacific coast of Washington, including Olympic Coast National Marine Sanctuary, from BOEM's Draft Proposed Five-Year OCS Leasing program.

Since 1992 our region has not been included in the national OCS leasing program for reasons which still apply today:

¹ The opinions expressed in this letter do not reflect the views of Federal agencies represented on the sanctuary advisory council. Additionally, the council is an advisory body to the sanctuary superintendent, and as such the opinions and findings of this letter do not necessarily reflect the position of the sanctuary and the National Oceanic and Atmospheric Administration.

- Olympic Coast National Marine Sanctuary as designated and affirmed in subsequent management plans does not allow for oil and gas exploration or development;
- Washington Coastal Treaty Tribes, through treaties with the United States government in this region, have opposed the inclusion of their treaty reserved areas in the leasing program; and
- Past and current governors of the west coast states (Washington, Oregon, and California) continue to consistently oppose this activity.

We believe that consideration of this region in the OCS program plan requires a thorough legal, environmental, and socioeconomic analysis prior to inclusion in a leasing planning document and the results of such an analysis would preclude inclusion of this area. In particular, there are many existing management plans and environmental assessments that identify the important resources and uses of this area, such as Olympic Coast National Marine Sanctuary Management Plan, Washington State’s Marine Spatial Plan, Washington’s State Wildlife Action Plan, and others.

Oil and gas leasing and development in marine waters along the Pacific coast of Washington poses unacceptable risks and threatens the integrity of areas that have been determined by the people of our nation as areas of special significance including Olympic Coast National Marine Sanctuary, treaty reserved areas of four coastal treaty tribes (Hoh, Makah, Quileute Tribes and the Quinault Indian Nation), the U.S. Fish and Wildlife Service Washington Islands National Wildlife Refuges and Wilderness, several Endangered Species Act “Critical Habitat” designations, “Essential Fish Habitat” areas, as well as Washington State’s Seashore Conservation Area, and the Olympic National Park’s wilderness coastline.

We are also extremely concerned that any oil and gas leasing program would threaten our coastal communities as our economies are based on a healthy productive ecosystem for fisheries, including one of the largest shellfish producers in the nation and for cultural fulfillment, all which supports a thriving tourism industry. We ask that the Bureau of Ocean and Energy Management take our concerns under thoughtful consideration and exclude marine waters along the Pacific coast of Washington State, including Olympic Coast National Marine Sanctuary.

Sincerely,



Lee Whitford
Chair, Olympic Coast National Marine Sanctuary Advisory Council