

July 3, 2018

Via Federal e-rulemaking portal:

https://www.regulations.gov/document?D=BOEM_FRDOC_0001-0463

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RE: Request for Feedback on BOEM's Proposed Path Forward for Future Offshore Renewable Energy Leasing on the Atlantic Outer Continental Shelf; 83 Fed. Reg. 14881 (April 6, 2018); Dkt. No. BOEM-2018-0018

Dear Mr. Browning:

Oceana, the largest international ocean conservation organization solely focused on protecting the world's oceans, appreciates the opportunity to submit comments regarding the Bureau of Ocean Energy Management's ("the Bureau") Request for Feedback for future offshore renewable energy leasing on the Atlantic Outer Continental Shelf ("OCS"). Oceana and its more than 780,000 members and supporters in the United States, over 200,000 of which reside on the Atlantic coast, are committed to shaping U.S. energy policy in our oceans and actively advocate for the United States to transition away from dangerous offshore oil and gas exploration and pursue cleaner and safer renewable energy off our coasts.

We strongly support the development of offshore wind when it is done in a way that is environmentally sound and responsibly sited. Done appropriately, offshore wind can and should play an important component of our energy paradigm moving forward. The United States must transition to renewable energy sources to maintain a healthy ocean, vibrant fisheries, and protect coastal communities from the impacts of offshore oil and gas development. The responsible development of offshore wind, in a manner that is protective of marine life and the environment, is an important step in this process.

Oceana commends the Bureau for initiating renewable energy leasing on the Atlantic OCS and appreciates the opportunity to comment on these developments as the Bureau moves forward with the leasing process.

BACKGROUND

To date, the Bureau has issued 13 commercial offshore wind leases in the Atlantic OCS spanning from North Carolina to Massachusetts. The Bureau is currently conducting high-level assessments of the waters off the Atlantic coast for additional offshore renewable energy leasing locations.¹ In its Request for Feedback, the agency has identified several potential factors to be considered in its high-level lease assessment, which will be discussed below. In a recent op-ed in the *Boston Globe*, the Secretary of the Interior, Ryan Zinke, acknowledged the importance that future wind energy, particularly offshore wind, will play in U.S. energy development and went on to recognize that energy development on public waters does not mean “sacrificing environmental stewardship.”²

Renewable energy is only one component of the current administration’s overly broad and untenable “all-of-the-above” energy approach, which also advocates for the expansion of oil and gas exploration and development in U.S. waters.³ The United States should devote its resources to transitioning to renewable energy sources and not harmful fossil fuels. Every dollar spent developing new offshore oil is a dollar we could and should have invested in safe, clean and renewable energy. Wind is an important part of our energy future; the disastrous impacts of offshore drilling, such as the BP *Deepwater Horizon* oil spill, which released over 200 million gallons of oil into the Gulf of Mexico,⁴ should remind us why oil and offshore drilling must become part of our past.

DISCUSSION

Oceana supports offshore renewable energy leasing in the Atlantic OCS, because offshore wind is a safe, reliable and environmentally sustainable energy source and because the Atlantic region has great offshore wind economic potential. In contrast, offshore oil and gas exploration and development is dangerous, harmful to the environment and the limited amounts of oil and gas resources in the Atlantic OCS (i.e., seven month’s-worth of oil and six month’s-worth of gas)⁵ are simply not worth the risk. The impacts of human-induced climate change are currently being witnessed in the United States and around the world, such as longer and hotter summers, shorter and warmer winters, stronger and more damaging storms, longer wildfire seasons, changes in species habitat, ocean acidification and sea level rise, just to name a few.⁶ To mitigate these climate change impacts, which have already cost the federal government over \$350 billion in the last decade and are projected to increase by \$12 billion to \$35 billion annually by mid-century,⁷ the United States must move away from fossil fuels and switch to renewable sources of energy, including offshore wind.

I. Atlantic Offshore Wind Has Excellent Economic Potential.

Offshore renewable energy, such as offshore wind, is a much better alternative to offshore oil and gas drilling. Offshore wind has the potential to generate more jobs, produce more power, and lead to a higher degree of energy independence than offshore drilling for oil and gas.⁸ Offshore wind would produce twice the number of jobs and twice the amount of energy as offshore drilling in the Atlantic.⁹ Over the next 20 years, offshore wind could create about 91,000 more

jobs than offshore drilling.¹⁰ And, in just 13 years, offshore wind could generate more energy than could be provided by all of the economically recoverable offshore oil and gas resources.¹¹

II. Offshore Oil and Gas Exploration and Development in the Atlantic OCS Is Not Worth the Risk.

Offshore oil and gas exploration and development in the Atlantic OCS is not worth the risk for the following reasons. First, oil and gas exploration and development is unavoidably risky and harmful to the environment. Second, oil and gas activities conflict with other industries dependent on a healthy Atlantic Ocean. Third, there is overwhelming opposition to oil and gas activities along the Atlantic coast.

A. Oil and Gas Exploration and Development Is Unavoidably Risky and Harmful to the Environment.

To conduct exploration, the oil and gas industry uses seismic airguns—a technology that is harmful to marine life. Seismic airguns release pressurized, dynamite-like blasts that create powerful sound waves and travel through the water column and into the seabed to detect oil and gas deposits. Seismic vessels can tow up to 96 individual seismic airguns, each of which blasts repeatedly every 10-12 seconds for days, week and months at a time.¹² Seismic airguns have significant, harmful impacts on fish,¹³ shellfish,¹⁴ sea turtles,¹⁵ whales,¹⁶ and zooplankton—the base of the ocean food chain upon which both marine and terrestrial life depends.¹⁷ Seismic surveys to determine where to site offshore wind use seismic airguns minimally, if at all; rather, high-resolution geophysical and geotechnical surveys are conducted to obtain information about subseafloor conditions, shallow hazards and surface subsurface geological and geotechnical properties.¹⁸ In addition, seismic testing for offshore wind development occurs over a much smaller area and is conducted after a potential wind farm site has already been identified. Moreover, seismic testing for offshore wind introduces far less sound energy into the marine environment, because seismic surveys for wind need only penetrate a few yards into the seabed. In contrast, oil and gas seismic surveys must penetrate deep within the earth's crust to search for oil and gas deposits.¹⁹

Oil and gas development is also destructive to both the marine and terrestrial environments. Thousands of oil spills occur in U.S. waters each year.²⁰ These spills include large-scale disasters, such as the BP *Deepwater Horizon*²¹ and *Exxon Valdez* spills, as well as annual spillage during extraction and transportation.²² Environmental disasters like the BP *Deepwater Horizon* spill did lasting biological harm to ocean ecosystems and economic harm to the people whose livelihoods rely on a healthy ocean, the coast, and its resources.²³ Wherever there is offshore drilling, there are devastating spills that adversely impact the ocean and the coastal environment and economies.

B. The Economy Along the Atlantic Coast is Dependent on a Healthy Ocean.

Another reason the Bureau should transition to renewable energy is because oil and gas activities conflict with other industries dependent on a healthy Atlantic Ocean. The Atlantic Ocean supports vibrant fisheries, coastal tourism and recreation, endangered species of marine mammals, and rare deep-sea coral formations. Along the Atlantic coast, over 1.5 million jobs and nearly \$108 billion in Gross Domestic Product (“GDP”) rely on a healthy Atlantic Ocean.²⁴

Tourism and recreation contributes nearly 1.5 million jobs and over \$103 billion in GDP to coastal state economies along the Atlantic Ocean.²⁵ As of 2015, commercial fishing contributed approximately 144,000 jobs and nearly \$4 billion in GDP to Atlantic states, and recreational fishing in the ocean contributed over 112,000 jobs and almost \$8 billion in GDP to Atlantic states.²⁶ All of this would be at risk if oil, gas or mineral development were permitted anywhere along the Atlantic coast.

C. There Is Overwhelming Opposition to Expanding Offshore Oil and Gas Exploration in the Atlantic.

There is also strong opposition to offshore oil and gas activities along the Atlantic. As of May 2018, over 200 municipalities and over 1,200 local, state and federal elected officials have opposed offshore oil and gas drilling and exploration along the East coast.²⁷ Numerous fishing and tourism interests, including local chambers of commerce, tourism and restaurant associations, and an alliance representing over 42,000 businesses and 500,000 fishing families from Florida to Maine, also strongly oppose oil exploration and/or development off the East coast.²⁸ Additionally, states themselves are choosing wind energy over offshore drilling for future development.²⁹

III. Bureau-Listed Factors Must Be Considered for Offshore Renewable Energy Leasing in the Atlantic OCS.

The Bureau has initially identified the following factors to be considered in the analysis for potential offshore renewable energy leasing on the Atlantic OCS.

- Exclusionary factors:
 - Areas prohibited by the Outer Continental Shelf Lands Act;
 - Department of Defense conflict areas;
 - Chartered marine vessel traffic routes;
- Positive factors:
 - Areas not previously removed;
 - Areas greater than 10 nautical miles from shore;
 - Areas shallower than 60 meters in depth;
 - Areas adjacent to states with offshore wind economic incentives;
 - Areas adjacent to states with an interest in identifying additional lease areas; and
 - Areas where industry has expressed interest.³⁰

Oceana agrees that consideration of these factors is important for responsible offshore renewable energy leasing in the Atlantic OCS and, in particular, that Outer Continental Shelf Lands Act prohibited areas remain off limits to energy leasing, including offshore wind.

IV. Oceana's Recommends That the Bureau Consider Additional Factors for Offshore Renewable Energy Leasing in the Atlantic OCS.

In addition to the Bureau-listed factors, Oceana recommends the Bureau also consider the following factors.

A. Engage with Regional Planning Bodies in the Mid-Atlantic and Northeast and Consult Regional Data Portals

Oceana recommends the Bureau actively engage with Regional Ocean Planning Bodies in the Mid-Atlantic and Northeast in its development of offshore renewable energy leasing in the Atlantic OCS. Additionally, the Bureau should draw upon available resources from the Mid-Atlantic and Northeast Ocean Data Portals to better understand potential impacts from proposed leasing activities in the Atlantic region. The Data Portals contain a range of maps identifying cultural resources, habitat areas, fishing, marine life and other human uses to help inform the Bureau's siting analysis.³¹ These Regional Planning Bodies have experience coordinating involvement with stakeholders, federal and state agencies as well as federally recognized tribes. Utilizing this expertise through active engagement with these groups and consulting the valuable information provided by the regional Data Portals is essential to ensure that offshore renewable energy leasing is conducted responsibly in the Atlantic OCS.

B. Commercial and recreational fisheries concerns

The Atlantic Ocean supports vibrant fisheries and is an incredibly productive region and commercial and recreational fishing contribute hundreds of thousands of jobs and billions of dollars to Atlantic states.³² We encourage the Bureau to consider the effects of renewable energy on fishery resources, including fish species and Essential Fish Habitat, and the fishery itself to reduce potential impacts. In addition, we encourage the Bureau to consult with fishery managers to ensure that siting minimizes the effects on fish, fisherman, and the ocean ecosystem.

C. Endangered species critical habitat

We strongly encourage the Bureau to ensure adequate assessment of the impacts offshore renewable energy development will have on endangered species critical habitat since many endangered and threatened marine mammal species inhabit the waters of the Mid- and South Atlantic coast.³³ Of particular concern is the North Atlantic right whale,³⁴ which is listed as critically endangered under the Endangered Species Act, is protected under the Marine Mammal Protection Act,³⁵ and is one of the most threatened mammal species in the United States.³⁶ Consideration of the North Atlantic right whale and other endangered species critical habitat is essential to ensuring that these animals are protected from potential impacts, and offshore renewable energy siting decisions are environmentally sound.

D. Recreation and tourism

Recreation and tourism concerns on the Atlantic coast also need to be considered by the Bureau in selecting offshore renewable energy sites to the extent required by law. As mentioned above, the Atlantic Ocean supports coastal tourism, which contributes millions of jobs and billions of dollars to coastal state economies along the Atlantic Ocean.³⁷ Ensuring consideration of these factors will help ensure that offshore renewable energy leasing in the Atlantic OCS adds additional value to the thriving existing coastal economies.

E. Other environmental and multiple use concerns

We encourage the Bureau to also assess other environmental and multiple use concerns in its analysis, such as the protection of marine protected areas (“MPAs”). In addition to directly contributing to coastal economies through fishing and tourism, our national marine sanctuaries and marine national monuments also provide a multitude of indirect benefits and support a wide variety of intrinsic values. On the Atlantic coast in 2013, an expedition discovered twenty-four deep-sea coral species that had never been seen before in the region now protected by the Northeast Canyons and Seamounts Marine National Monument.³⁸ Another example of the wide variety of intrinsic values of marine national monuments and national marine sanctuaries is that, through the stakeholder engagement process, these areas may be able to reduce user conflicts.³⁹ In addition, MPAs can also achieve important human welfare goals through improvements in food security and empowerment of local communities.⁴⁰ We encourage the Bureau to maintain protections for these important places as required by law.

CONCLUSION

Oceana strongly supports the development of offshore renewable wind energy when it is done in a way that is environmentally sound and responsibly sited. Done appropriately, offshore wind can and should play an important component of our energy paradigm moving forward, as it offers immense potential for economic growth and clean energy generation.

Oceana commends the Bureau for conducting renewable energy leasing on the Atlantic OCS and urges the Bureau to focus its limited resources on exploring offshore wind rather than on shortsighted plans for offshore oil and gas drilling. The United States needs to transition toward renewable energy and offshore wind and take us one step closer to a cleaner and more energy independent future.

Oceana appreciates the opportunity to provide our recommendations. We look forward to working with the Bureau to ensure that the areas selected for renewable energy leasing on the Atlantic OCS are the product of thorough and thoughtful analysis.

Sincerely,



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cc:

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