



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 8, 2018

Ms. Kelly Hammerle
Bureau of Ocean Energy Management
45600 Woodland Road
Sterling, VA 20166-9216

Re: The U.S. Department of Interior's Draft Proposed Program for Outer Continental Shelf Oil and Gas Leasing for 2019-2024

Dear Ms. Hammerle:

Thank you for the opportunity to comment on the U.S. Department of Interior's five-year Draft Proposed Program (DPP) for the Outer Continental Shelf (OCS) Oil and Gas Leasing for 2019-2024. As Director of the Washington Department of Ecology, I am committed to protecting and managing our irreplaceable marine ecosystems now and for future generations. Our coastal communities and thousands of residents depend on having a healthy and productive coastal environment to maintain their livelihoods, homes, families, and quality of life.

I am extremely disappointed that Interior's Bureau of Ocean Energy Management (BOEM) has included the Washington/Oregon planning area in the current DPP. There is no reasonable, rational justification for including Washington's Outer Continental Shelf in the 2019-2024 Oil and Gas Leasing Program. I urge you to remove Washington's outer continental shelf from consideration.

Washington's coast and the adjacent offshore area:

- Is an abundant, highly productive marine ecosystem.
- Contains many sensitive marine species and habitats.
- Supports a high density of existing, valuable ocean activities such as fishing, shellfish aquaculture, recreation, tourism, international maritime shipping, and military training.
- Encompasses significant tribal economic and cultural treaty protected resources.
- Has no existing oil or gas leases.
- Has such little potential for oil and gas production that new development would not significantly add to the nation's energy supply.

BOEM's proposed oil and gas lease sale for Washington's OCS would significantly overlap with and negatively affect existing ocean uses and resources – with potential impacts stemming from



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exploration, construction, development, and production activities, including large and small oil spills. The DPP conflicts with the State of Washington's laws, policies, and goals.

Furthermore, the DPP summarizes comments BOEM received to exclude the Olympic Coast National Marine Sanctuary from the proposed leasing program. Under Public Law 102-587, Section 2207, oil and gas leasing is expressly prohibited in the 1994 federally-designated sanctuary. If the Olympic Coast National Marine Sanctuary is included in the five-year program, it would violate current federal law, regulations, and management plans under CFR Title 15 Section 922.13(h).

In revising its five-year program, BOEM needs to clarify it lacks the legal authority to issue oil and gas leases in the Olympic Coast National Marine Sanctuary. Additionally, offshore oil and gas activities proposed elsewhere off Washington's coast would pose unacceptable risks to resources within the sanctuary.

We have included an addendum that provides more detailed data and information about the location and types of ocean resources and uses on Washington's coast and in the offshore area. We have also highlighted issues of concern that support our request to remove the Washington's OCS from the 2019-2024 Oil and Gas Leasing Program. Our responses are organized by the eight factors the Interior Secretary must consider for choosing the size, timing, and location of oil and gas leases in the national program. The addendum includes recommendations for BOEM's review and analysis and sources of information.

Since offshore oil and gas leasing, exploration, and development activities have a high potential to damage our environment, cause irreversible harm to our coastal communities and resources, and disrupt current ocean uses on Washington's coast, they are completely at odds with our state's vision for a sustainable and prosperous future.

Sincerely,

A handwritten signature in black ink, appearing to read "Maia D. Bellon", followed by a long horizontal flourish line.

Maia D. Bellon
Director