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August 16, 2017

Ms. Kelly Hammerle, National Program Manager  
BOEM  
45600 Woodland Road, Mailstop VAM-LD  
Sterling, VA 20166

Re: Bureau of Ocean Energy Management (BOEM) request for comments on the preparation of a new five-year National Outer Continental Shelf Oil and Gas Leasing Program (National OCS Program) for 2019-2024 pursuant to the Outer Continental Shelf (OCS) Lands Act.

Dear Ms. Hammerlee,

Audubon California, a state office of the National Audubon Society, with our 350,000 members and supporters, and the 25 signed Audubon chapters in California, oppose the preparation of a new five-year National Outer Continental Shelf Oil and Gas Leasing Program (National OCS Program) for 2019-2024 pursuant to the Outer Continental Shelf (OCS) Lands Act. We oppose the inclusion of the Pacific Region as a planning area to be considered and analyzed. Furthermore, the northern, central and southern California planning areas of the National OCS program should be permanently banned from further oil and gas exploration and activity, as Governor Brown requested in 2016.<sup>1</sup>

Our comments pertain specifically to factors (2) and (6) of the general information requested by BOEM: “Existing information concerning geographical, geological, and ecological characteristics of the OCS planning areas and near shore and coastal environments; relative environmental sensitivity and marine productivity of the different planning areas and/or a specific section(s) of a given OCS planning area.”

The outer continental shelf (OCS) off of California is part of the California Current Ecosystem (CCE), one of the world’s five highly productive eastern boundary current system that support a diverse array of marine wildlife and fisheries. Scientific studies show that waters here support a “Blue Serengeti,” characterized by a continued presence of large predators in the system, many of which migrate as much as 2000 km from the western, central or south Pacific basin to feed. Predators aggregating here to feed include tunas, swordfish, albatrosses, shearwaters, sharks, turtles, seabirds, pinnipeds and whales. The Gulf of the Farallones and Cordell Bank in north

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<sup>1</sup> [https://www.gov.ca.gov/docs/POTUS\\_Letter\\_12.13.16.pdf](https://www.gov.ca.gov/docs/POTUS_Letter_12.13.16.pdf)

central California, Monterey Bay in central California, and the Southern California Bight, are three of the most important fish and wildlife feeding areas in the Pacific.<sup>2</sup>

In addition to these visiting species, the system supports numerous locally breeding seabirds and marine mammals including murrelets, storm-petrels, cormorants, terns, sea lions and seals. The OCS supports a number of marine Important Bird Areas, designated by the National Audubon Society, comprised of both seabird breeding islands and pelagic foraging hotspots. For example, the Farallon Islands in north-central California contain the largest seabird colony in the lower 48 states, with approximately 250,000 breeding seabirds of 13 species. Federally endangered California least terns nest and feed primarily in southern California.<sup>3</sup> In sum, the CCE in California is one of the most diverse and productive marine regions in the world, supporting numerous commercially and recreationally important species, threatened and endangered species, and a rich diversity of other wildlife that supports our state's economy and quality of life.

Commercial and recreational fisheries, wildlife watching businesses, and other coastal industries that depend on this rich and productive ocean ecosystem are a substantial economic engine for California. NOAA has reported that from 2010 to 2012 the total economic contribution from recreational fishing in the four California National Marine Sanctuaries was \$213.1 million in output, \$129.0 million in value-added, \$74.6 million in income and more than 1,370 jobs.<sup>4</sup> Overall, NOAA estimates that the National Marine Sanctuaries in California annually generate about \$8 billion from diverse sectors including commercial fishing, research, and tourism-related activities.<sup>5</sup> Statewide, tourism and recreation is the largest of California's six ocean-dependent sectors, accounting for \$17.6 billion 39 percent of the ocean economy's GDP (\$17.6 billion), 75 percent of the ocean economy's employment (368,000), and 46 percent of the ocean economy's wages (\$8.7 billion) in 2012.<sup>6</sup>

The biological richness of the California OCS confers on it a high degree of environmental sensitivity to oil and gas spills. For example, the 1969 Santa Barbara oil spill polluted 35 miles of shoreline and hundreds of square miles of coastal waters with 3 million gallons of oil. The spill killed seabirds, marine mammals, fishes and seagrass beds with substantial economic consequences. Since that time, additional oil spill events have occurred in southern California and in San Francisco Bay, with consequences to wildlife, fisheries and coastal tourism. These

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<sup>2</sup> Block, B. et al. 2011. Tracking apex marine predator movements in a dynamic ocean. *Nature* 475 pp. 86-90.

<sup>3</sup> Audubon. 2017. Marine Important Bird Areas. <http://www.audubon.org/important-bird-areas>

<sup>4</sup> [https://nmssanctuaries.blob.core.windows.net/sanctuaries-prod/media/archive/science/socioeconomic/pdfs/california\\_rec\\_sanctuaries.pdf](https://nmssanctuaries.blob.core.windows.net/sanctuaries-prod/media/archive/science/socioeconomic/pdfs/california_rec_sanctuaries.pdf)

<sup>5</sup> <https://sanctuaries.noaa.gov/news/dec16/sanctuaries-blue-economy.html>

<sup>6</sup> <https://coast.noaa.gov/data/digitalcoast/pdf/california-ocean-economy.pdf>

spills can reasonably be expected to occur again, posing a continued ongoing severe threat to coastal species and habitats. Oil spill events create an additional burden on the State by requiring action from the Office of Spill Prevention and Response (OSPR) and the California Department of Fish and Wildlife's Oiled Wildlife Response Network.

Inclusion of the Pacific Region would be in direct opposition to the clearly expressed intent of leaders in the west coast states. Following governors' requests, the four planning areas off the Pacific coast – Washington/Oregon, Northern California, Central California, and Southern California- were not included for potential leasing in the 2017–2022 Program. In December of 2016, California's governor requested permanent withdraw of federal waters off the coast of California from new offshore oil and gas leasing and a guarantee that future oil and gas drilling in these waters is prohibited. On April 27, the governors of California, Oregon and Washington support retention of this status quo in their joint statement:

“Today's unilateral action is short-sighted. For good reason there has been no federal expansion of oil and gas drilling along our shared coastline for more than 30 years. We still remember what happened in Santa Barbara in 1969, Port Angeles in 1985, Gray's Harbor in 1988 and Coos Bay in 1999. We remember the oil soaked beaches and wildlife and the devastating economic impacts to local communities and the fishing industry. Now is not the time to turn back the clock. We cannot return to the days where the federal government put the interests of big oil above our communities and treasured coastline.”<sup>7</sup>

In conclusion, opening our West coast to new offshore drilling is not in keeping with President Trump's Executive Order to “foster energy security and resilience for the benefit of the American people, while ensuring that any such activity is safe and environmentally responsible.” Please remove the Pacific Region as a planning area to be considered and analyzed, and remove the northern, central and southern California planning areas of the National OCS program from consideration for further oil and gas exploration and activity.

Sincerely,



Michael Lynes  
Director of Public Policy  
Audubon California

Audubon California chapters:

Natalie Shapiro  
President  
Buena Vista Audubon Society

Cindy Margulis  
Executive Director  
Golden Gate Audubon Society

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<sup>7</sup> <https://www.gov.ca.gov/news.php?id=19767>

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