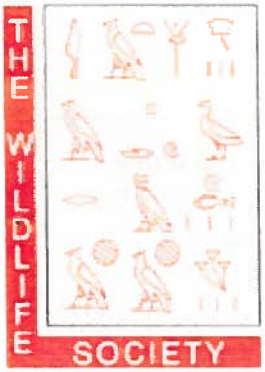


Northeast Section
The Wildlife Society

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

January 31, 2018

Dear Ms. Hammerle:

The Wildlife Society is an international non-profit scientific and educational association dedicated to excellence in wildlife stewardship through science and education. Our mission is to enhance the ability of wildlife professionals and wildlife students to conserve biodiversity, sustain wildlife populations, and ensure responsible use of wildlife resources and habitats. The Northeast Section of The Wildlife Society is comprised of 7 State Chapters and 19 Student Chapters, representing nearly 1,000 wildlife managers, biologists, ecologists, botanists, hydrologists, geologists, and students from Maine to West Virginia – all devoted to the sustainable conservation of wildlife and wildlife habitat in the northeastern United States.

The Northeast Section of The Wildlife Society is pleased to submit the following comments relating to the Bureau of Ocean Energy Management's (BOEM) Draft Proposed Program (DPP) to develop new National Outer Continental Shelf (OCS) leases pursuant to Executive Order 13795. As part of the decision-making process, BOEM is specifically requesting comments on impacts to environmental sources related to the DPP.

The Northeast Section of The Wildlife Society recommends that no leases be offered until an assessment from the National Academy of Sciences (NAS) of the direct, indirect, and cumulative impacts that offshore oil and gas leasing would have on coastal and ocean ecosystems is completed. In addition, the NAS assessment should take into account other stressors including climate change that are currently affecting these ecosystems.

Within the geographic boundary of the Northeast Section of The Wildlife Society, the North Atlantic Planning Area is under review by BOEM, and we offer the following comments specific to this unit.

- **Expanded offshore drilling poses the risk of oil spills adversely impacting ecosystems.** In 2008, Hurricane Ike destroyed oil platforms, tanks, and pipelines throughout the Gulf of Mexico releasing over 500,000 gallons of crude oil. During Hurricanes Katrina and Rita there were 125 spills from platforms, rigs, and pipelines in the OCS releasing almost 685,000 gallons of petroleum products. Large spills over 1000 barrels occur relatively routinely (every 21 months) according to Anderson *et al.* (2012). The Atlantic coast has been off-limits for drilling since 1981. If oil drilling infrastructure were in place when Superstorm Sandy struck, even more devastating impacts on fish and wildlife would have occurred along the North Atlantic. Risk modelling by Eckle et al. (2012) indicates that an event the size of the Deepwater Horizon incident can be broadly predicted to occur once every 17 years. Meteorological and climatological natural catastrophes in North America have increased since 1980 according to Munich Re, NatCatService, a comprehensive database for analyzing and evaluating natural catastrophes. BOEM should use trends, occurrence rate information, climate change predictions, and modeling to fully evaluate risks associated with the probability of catastrophic events that would result in oil spills in the North Atlantic for its evaluation of impacts on ecosystems.

  Additionally, oil spill impacts should be analyzed over a long-term period. The U.S. Fish and Wildlife Service (2016) reports that 102,000 birds across 93 species were killed due to Deepwater Horizon. Additionally, Peterson *et al.* (2003) identifies chronic exposure, and sublethal effects on wildlife in the Prince William Sound 14 years after Exxon Valdez. According to the NAS current cleanup methods only remove a small fraction of the oil spilled into the ocean, leaving the remaining oil to continue to affect the ocean ecosystem over time.
  The long term adverse impacts from predicted spill on the ecosystem including fish, shellfish, sea turtles, marine mammals, and coastal birds should be evaluated as part of any National Environmental Policy Act (NEPA) document.

- **Drilling exploration activities can adversely affect marine organisms.** Seismic surveys and increased boat and air traffic can adversely affect fish, marine mammals, as well as pelagic birds (Southhall *et al.*, 2008; Hawkins *et al.*, 2014). Direct, indirect and cumulative impacts from these activities should be evaluated in NEPA documents.

- **Drilling operations, outside of oil spills, can adversely impact marine ecosystems.** Offshore drilling produces toxic wastes and other forms of pollution including tens of thousands of gallons of waste drilling mud (Gray *et al.*, 1990). One drilling platform normally releases more than 90,000 metric tons of drilling fluids and metal cuttings into the ocean. Drilling mud can contain heavy metals including mercury, lead, and cadmium that may accumulate and biomagnify in

marine organisms. Produced water (fluid trapped underground and brought up with oil and gas) makes up 20 percent of waste associated with offshore drilling. Produced water can have toxic effects to fish and shellfish and potentially other marine organisms (Bakke, *et al.*, 2013). Adverse impacts associated with hydrocarbon releases from produced water should be evaluated regarding impacts on the ecosystem and associated fish and wildlife.

- **Offshore drilling requires substantial onshore infrastructure including new roads, pipelines, and processing facilities.** Direct, indirect, and cumulative impacts on inland fish and wildlife resources from infrastructure (e.g., roads, pipelines, and processing facilities) related to offshore drilling operations should also be evaluated as part of any NEPA document.

- **Offshore drilling infrastructure and vessels increases the probability of collision with marine mammals, sea turtles, and pelagic birds.** Offshore drilling increases boat and air traffic to and from the drilling platforms increasing the probability of adverse impacts on marine organisms and coastal birds. Additionally, lights (Longcore and Rich, 2004) and flaring on drilling platforms substantially increases the probability of collision with pelagic and coastal birds. These structures and their adverse impacts on wildlife species should be assessed.

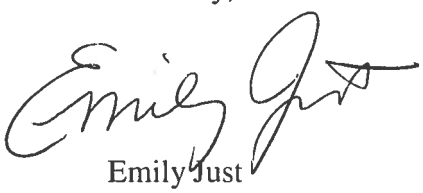
- **The DPP is missing threatened and endangered species and significant protected areas.** The DPP should include all threatened and endangered species that would be impacted by offshore drilling. The DPP does not include shortnose sturgeon (e), Atlantic sturgeon (t), northeast beach tiger beetle (t), and seabeach amaranth (t). The DPP should also include species currently being considered for listing including saltmarsh sparrow. Additionally, the DPP should identify significant protected areas that may be adversely impacted by offshore drilling including a variety of coastal national wildlife refuges and wilderness areas such as one on the Edwin B. Forsythe National Wildlife Refuge. The DPP should also include a discussion of impacts on National Seashores, National Parks, and U.S. Monuments that are within the North Atlantic project area.

In conclusion, the Northeast Section of The Wildlife Society, believes the proposal to open up the North Atlantic to offshore drilling poses significant and substantial impacts to marine and estuarine ecosystems and the fish and wildlife that depend on them. We strongly believe that no leases should be authorized until an assessment from the NAS of the direct, indirect, and cumulative impacts that offshore oil and gas leasing would have on coastal and ocean ecosystems is completed. In addition, the NAS assessment should take into account other stressors including climate change that are currently affecting these ecosystems. These impacts should be carefully evaluated to prevent, minimize, and mitigate for all adverse impacts on these important ecosystems prior to the initiation of any lease program.

Thank you for the opportunity to provide these comments regarding BOEM's consideration of the new OCS lease program. Should you have any questions or require

additional information from the Northeast Section of The Wildlife Society, please contact me.

Sincerely,



Emily Just
President
The Northeast Section of the Wildlife Society

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