**ALASKA WILDERNESS LEAGUE**—**CALIFORNIA COASTAL PROTECTION NETWORK**—**CENTER FOR BIOLOGICAL DIVERSITY—DEFENDERS OF WILDLIFE—DOGWOOD ALLIANCE**—**EARTHJUSTICE—ENVIRONMENTAL ACTION COMMITTEE OF WEST MARIN**—**ENVIRONMENTAL INVESTIGATION AGENCY—ENVIRONMENT NEW JERSEY**—**FAIRBANKS CLIMATE ACTION COALITION—GREENPEACE USA**—**NATURAL RESOURCES DEFENSE COUNCIL—NORTHERN ALASKA ENVIRONMENTAL CENTER**—**PACIFIC ENVIRONMENT—SIERRA CLUB—SOUTH CAROLINA WILDLIFE FEDERATION**—**SURFRIDER FOUNDATION—THE HUMANE SOCIETY OF THE UNITED STATES**—**THE WILDERNESS SOCIETY—WHALE AND DOLPHIN CONSERVATION**

May 30, 2018

**Via Federal eRulemaking Portal**

**BOEM—2017—0063**

The Honorable Ryan Zinke

Secretary

United States Department of the Interior

1849 C Street NW

Washington, DC 20240

**Re: Outer Continental Shelf, Alaska OCS Region, Beaufort Sea, Proposed Oil and Gas Lease Sale for 2019 Call for Information and Nominations (83 Fed. Reg. 13,778 (March 30, 2018)).**

Dear Secretary Zinke,

We write in opposition to your agency’s decision to prepare an offshore oil and gas lease sale in the Beaufort Sea in 2019. This latest effort, a call for information and lease sale nominations for an area not in any current leasing plan and most of which is permanently withdrawn from oil and gas leasing, doubles down on your agency’s all-out push to relegate the Arctic Ocean to offshore oil drilling. We urge you to reconsider your efforts to schedule and plan for a Beaufort Sea sale in 2019. As many of our groups reiterated to you just last month in comments on your agency’s draft proposed 2019-24 Outer Continental Shelf Oil and Gas Leasing Program,[[1]](#footnote-1) the Arctic Ocean is too sensitive, irreplaceable, and risky a place to drill, and expanding fossil fuel development in the region would undermine urgently needed efforts to address climate change.

Your agency has previously reached the same conclusion, supported by science and the American public. In excluding the Arctic Ocean entirely from offshore oil leasing in the 2017-22 Outer Continental Shelf Oil and Gas Leasing Program, Interior recognized that the Arctic Ocean is no place to expand offshore drilling for a number of reasons.[[2]](#footnote-2) Interior explained that rapid climate changes in the region “increase the vulnerability of . . . environmental resources and reduce their resilience to impacts of OCS oil and gas activities,”[[3]](#footnote-3) such as seismic surveying, which can cover tens of thousands of miles, blanketing the ocean with deafening blasts and harming thousands of sensitive marine mammals.[[4]](#footnote-4) “Additionally, the remote nature of the Arctic program areas, the lack of widespread infrastructure, and the presence of sea ice for a large part of the year also make Arctic coastal zones more vulnerable to impacts from oil spills because of the challenges associated with conducting cleanup activities in the event of an oil spill.”[[5]](#footnote-5) And oil spills, even large ones, are likely—your agency predicts there is a 75 percent chance of a major oil spill from full development of even one lease sale in the region.[[6]](#footnote-6) The existence of especially sensitive portions of the Beaufort, noted in your call for information, is all the more reason to avoid leasing throughout the sea, “as the ecologically significant resources within [such areas] could be dramatically impacted by activities outside of those areas.”[[7]](#footnote-7) Closing the Arctic Ocean to oil and gas drilling is also critical, your Department concluded, to facilitate “transition[ing] energy systems away from fossil fuels . . . because any potential significant Arctic offshore production would only occur around the middle of this century, a timeline that is incongruous with our nation’s need . . . to reduce carbon emissions.”[[8]](#footnote-8)

These reasons remain and compel abandoning your current effort. The head of the Coast Guard reiterated just last summer that there are no effective means to respond to or clean up an oil spill in the Arctic’s harsh and remote conditions.[[9]](#footnote-9) A report last year by the U.S. Global Change Research Program—comprised of the nation’s top climate scientists—also confirms the folly of offshore drilling in places like the Arctic Ocean. The report concludes that the world must substantially reduce net global CO2 emissions prior to 2040 relative to present-day values to keep warming below 2 degrees Celsius and avoid the worst effects of climate change.[[10]](#footnote-10) Expanding oil development in frontier regions like the Arctic Ocean, where any oil would not come to market for decades even if it were discovered and could be developed safely, cannot be part of the solution. An even more recent set of studies reiterated the dire consequences for the Arctic of even a 2 degrees Celsius temperature rise, further highlighting the urgency of the needed transition away from fossil fuels and the Arctic’s inability to bear yet another stress from industrial development.[[11]](#footnote-11)

Finally, planning an area-wide lease sale for the Beaufort Sea is a waste of agency resources because it would be unlawful to hold a sale in the areas President Obama permanently withdrew from leasing in December 2016. Though President Trump attempted last Spring to undo these withdrawals, he lacks authority to do so, and his action is being challenged in federal court.[[12]](#footnote-12)

We urge you to abandon your plan to prepare an offshore lease sale in the Beaufort Sea. Rather, you should maintain protections for the Arctic Ocean adopted in the 2017-22 Outer Continental Shelf Oil and Gas Leasing Program and supported by sound science, your predecessors at the Department, and millions of Americans.

Respectfully submitted,

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1. Alaska Climate Action Network *et al*., Comments on the 2019-2024 Draft Proposed Outer Continental Shelf (OCS) Oil and Gas Leasing Program and Notice of Intent to prepare a Programmatic Environmental Impact Statement (83 Fed. Reg. 829 (Jan. 8, 2018)) (Mar. 9, 2018), Regulations.gov Docket Id. BOEM-2017-0074. [↑](#footnote-ref-1)
2. *See* Bureau of Ocean Energy Management, 2017-2022 Outer Continental Shelf Oil and Gas Leasing Proposed Final Program (Nov. 2016) (2017-22 Program); Department of the Interior, Fact Sheet: President Obama Protects 125 Million Acres of the Arctic Ocean at 1-2 (Dec. 2016) (Interior Fact Sheet), available at http://www.presidency.ucsb.edu/ws/index.php?pid=123169. [↑](#footnote-ref-2)
3. 2017-22 Program at S-9. [↑](#footnote-ref-3)
4. For example, the National Marine Fisheries Service estimated that a single two-month-long seismic survey in 2012 in the Arctic Ocean would disturb over 60,000 ringed seals and 4,600 beluga whales. *See* 77 Fed. Reg. 65,060, 65,084-85 (Oct. 24, 2012). [↑](#footnote-ref-4)
5. *Id.* [↑](#footnote-ref-5)
6. Interior Fact Sheet, *supra* note 2. [↑](#footnote-ref-6)
7. *Id*. [↑](#footnote-ref-7)
8. *Id.* [↑](#footnote-ref-8)
9. S. Waldman, *U.S. couldn’t clean up an oil spill — Coast Guard chief*, E&E News (July 19, 2017) (quoting Admiral Paul Zukunft). [↑](#footnote-ref-9)
10. U.S. Global Change Research Program, Climate Science Special Report at 1 (2017). [↑](#footnote-ref-10)
11. *See* T. Yulsman, *Half a Degree Celsius Could Make a Big Difference for Arctic Sea Ice,* Discover (Apr. 9, 2018); *see also* A. Jahn, *Reduced probability of ice-free summers for 1.5 °C compared to 2 °C warming*, Nature Climate Change (2018); M.Sigmond *et al*., *Ice-free Arctic projections under the Paris Agreement,* Nature Climate Change (2018). [↑](#footnote-ref-11)
12. *See League of Conservation Voters v. Trump*, 3:17-cv-00101-SLG (D. Alaska, May 3, 2017). [↑](#footnote-ref-12)