

March 9, 2018

Kelly Hammerle
National Program Manager
Bureau of Ocean Energy Management
U.S. Department of Interior
45600 Woodland Road
Mailstop VAM-LD
Sterling, VA 20166

RE: Opposition to the Draft Proposed OCS Oil & Gas Leasing Program from Oregon Audubon Chapter Council.

Dear Ms. Hammerle,

On behalf of 10 Oregon Audubon Chapters representing over 15,000 members we write to strongly oppose BOEM's Draft Proposed 2019-2024 OCS Oil and Gas Leasing Program. Offshore drilling is a highly risky proposition that has the potential to devastate our ocean, coastal communities, and marine wildlife that depend on a healthy ecosystem. Oregon's coastal waters support millions of seabirds, important marine mammal migration routes, commercially important fisheries, as well as tourism and recreation. This proposal represents a major threat to our marine environment.

Offshore oil and gas development in Oregon offshore waters would require seismic surveys, drilling operations, oil transport by tankers, and the installation of platforms, pipelines, and other infrastructure. Collectively these activities would significantly damage the environment, marine wildlife, and coastal economies and ways of life. New offshore drilling would also expose the marine environment and coastal communities to the risks of another catastrophic oil spill.

The risks to Oregon's marine ecosystem

Oregon's marine waters are at a pivotal location within the California Current Ecosystem (CCE), an upwelling biome ecosystem spanning North America's West Coast that is one of the most productive ecosystems in the world ocean. Disturbances associated with oil exploration and development can negatively impact marine mammals¹ and other marine life². A large disruption (i.e. large oil spill) in the CCE in Oregon or Northwest waters would likely have CCE-wide

¹ <https://www.npr.org/sections/thetwo-way/2018/02/19/586061334/seismic-surveys-planned-off-u-s-coast-pose-risk-to-marine-life>

² Aguilar de Soto, N., Delorme, N., Atkins, J., Howard, S., Williams, J. and Johnson, M. 2013. Anthropogenic noise causes body malformations and delays development in marine larvae. *Scientific Reports* 3: 2831 DOI: 10.1038/srep02831.

<https://www.cbd.int/doc/meetings/mar/mcbem-2014-01/other/mcbem-2014-01-submission-seismic-airgun-en.pdf>

ecological impacts that could take decades or more for ecosystem recovery and would result in billions of dollars of damage in ecosystem services.

Oregon's marine environment and coastline is host to important congregations of marine life that live year round or migrate to these productive waters. The Audubon network has identified 37 Important Bird Areas (IBAs) along Oregon's coast (see map below). IBAs are internationally recognized sites with exceptional importance to the conservation of bird populations. Oregon's coast supports over 1.3 million breeding colonial nesting seabirds representing over half of the breeding colonial seabirds on the entire West Coast³.

Small vulnerable populations of some bird species that depend on the marine environment would be placed in extreme danger. As a case in point, the black oystercatcher, a shorebird species that depends entirely on the intertidal zone and listed as a species of conservation concern in Oregon⁴ would be extremely vulnerable to extirpation in the state if a catastrophic oil spill were to occur. The most recent black oystercatcher population estimate indicates a small population in Oregon of approximately 500-600 individuals⁵ that is extremely vulnerable to environmental impacts. The marbled murrelet, a species listed as Threatened under the federal Endangered Species Act (ESA) and recently uplisted from Threatened to Endangered under Oregon's ESA, depends on coastal waters for its food (small forage fish species). A significant impact to this species' low Oregon population could tip it toward oblivion as it is already in danger of extinction in Oregon within this century⁶.

Marine mammals like the gray whale migrate along the West Coast twice every year between winter breeding grounds in Baja California and summer feeding areas in Alaska. Noises associated with oil and gas exploration surveys can affect whales up to 3 kilometers away⁷ and a catastrophic oil spill would essentially block gray whale migratory routes up the West Coast.

Nearshore species of conservation concern⁸ including many slow growing rockfish species, Chinook Salmon, Coho Salmon, forage fish species (e.g. eulachon, anchovies, smelt, sand lance), lingcod, and many others would be impacted by oil exploration, development, and oil spills.

The risks to Oregon's coastal economy

Oregon's commercial fishing industry contributed over \$500 million in personal income in 2016 with an economic impact of over \$2 billion.⁹ Commercially important fisheries in Oregon,

³ <https://nctc.fws.gov/resources/knowledge-resources/pdf/Oregon-Catalog-seabirds.pdf>

⁴ <http://oregonconservationstrategy.org/strategy-species/black-oystercatcher/>

⁵ <http://audubonportland.org/files/citizen-science/updated-black-oystercatcher-report-2016>

⁶ McShane, C., T. Hamer, H. Carter, G. Swartzman, V. Friesen, D. Ainley, R. Tressler, K. Nelson, A. Burger, L. Spear, T. Mohagen, R. Martin, L. Henkel, K. Prindle, C. Strong, and J. Keany. 2004. Evaluation report for the 5-year status review of the marbled murrelet in Washington, Oregon, and California. Unpublished Report. EDAW Inc., Seattle, Washington. Prepared for the U.S. Fish and Wildlife Service, Region 1. Portland OR.

⁷ Rebecca A. Dunlop, Michael J. Noad, Robert D. McCauley, Lindsay Scott-Hayward, Eric Kniest, Robert Slade, David Paton, Douglas H. Cato. 2017, Determining the behavioural dose-response relationship of marine mammals to air gun noise and source proximity. *Journal of Experimental Biology* 2017 220: 2878-2886; doi: 10.1242/jeb.160192

⁸ <http://oregonconservationstrategy.org/oregon-nearshore-strategy/species/>

including Dungeness crab, salmon species, Pacific halibut, Pacific sardine, species, and many others would suffer immensely in the event of a sizable oil spill.

Recreational sport fishing also contributes tens of millions of dollars (\$68.9 million in 2014) of total personal income to Oregon's coastal economies.¹⁰ Coastal tourism in Oregon supports over 20,000 jobs and generates \$1.9 billion in revenues annually. Coastal sportfishing and recreation opportunities depend on clean beaches and waters, abundant wildlife, and scenic view sheds – all of which would be compromised by the expansion of offshore drilling. An oil spill off or our shores would jeopardize jobs in the commercial, recreational fishing, and recreation-based tourism economies of Oregon.

Exploiting Oregon's meager oil/gas potential is not worth the risk

Exploratory surveys off Oregon in the 1970s and 80s revealed very limited fossil fuel reserves. Oregon's Geology and Mining Department (DOGAMI) states that it is unlikely oil drilling will be productive or feasible off Oregon's Coast. In fact, existing information indicates that oil and gas resources off Oregon and Washington combined are minimal and production would supply the nation with oil for only 15 days. Despite what the oil industry says about "state of the art" technology, the fact is that no technology is fool proof and safe enough to prevent oil spills. This fact is reflected in numerous recent oil spills including a devastating one in the East China Sea that occurred less than 2 months ago.¹¹

We are all too familiar with massive oil spills and the ensuing carnage in our own country as well. It is impossible to prevent accidents no matter what the precaution as we saw most recently with the catastrophic 2010 Deep Water Horizon spill in the Gulf of Mexico. A sizeable spill anywhere along our shared coast would have a devastating impact on our population, recreation, natural resources, and our ocean and coastal-dependent economies. These risks are amplified by the proximity of Cascadia Subduction Zone just offshore in the Pacific Northwest, which is one of the most hazardous seismic zones in North America. A large scale earthquake would be damaging to offshore drilling installations.

Moreover, in this time of changing climate, we need to move away from fossil fuel dependence and strive towards a more sustainable and secure clean energy economy.

Follow a sustainable pathway

Oregon has a long history of opposition to efforts to lease oil and gas areas in Oregon OCS waters and has supported the congressional moratorium on oil and gas leasing on the OCS of the West Coast since 1990. Oregonians have consistently made it known that their priority is long-term use and protection of renewable resources which is exemplified in Oregon's Statewide Land use Planning Goal 19 which states, "To conserve marine resources and

⁹ ODFW, "Oregon's Ocean Commercial Fisheries,"

http://www.dfw.state.or.us/mrp/docs/Backgrounder_Comm_Fishing.pdf

¹⁰ ODFW, "Oregon Marine Recreational Fisheries Economic Contributions In 2013 and 2014."

http://www.dfw.state.or.us/agency/docs/ODFW_Marine_Rec_Ec_Effects_2013-2014.pdf

¹¹ New York Times. Feb. 12, 2018. Spill threatens some of Asia's richest fisheries.

ecological functions for the purpose of providing long-term ecological, economic, and social value and benefits to future generations.” The proposal to open up our offshore waters to oil and gas development is counter to the values cherished by Oregonians.

We urge you to rescind this proposal and return to a more sensible policy that protects our offshore waters for our long-term coastal ecosystem protection and support of our coastal economies.

Thank you for your consideration.

Sincerely,

Joe Liebezeit and Bob Sallinger
Staff Scientist, Conservation Director, Audubon Society of Portland

Ann Vileisis
President, Kalmiopsis Audubon Society

Carol Mockridge
President, Rogue Valley Audubon

Harvey Schubothe
President, Cape Arago Audubon Society

David Harrison
Conservation Chair, Salem Audubon Society

Diana Wales
President, Umpqua Valley Audubon Society

Jim Fairchild and Christopher Mathews
Conservation Chair and President, Audubon Society of Corvallis

Joseph Youren and Jack Doyle
Vice-President and President, Audubon Society of Lincoln City

Deborah Schlenoff
Conservation Chair, Lane County Audubon Society

Tom Lawler & Ken Hashagen
Conservation Chair & President, East Cascades Audubon Society



Oregon's coastal Important Bird Areas