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August 15, 2014

Secretary of the Interior Sally Jewell
U.S. Department of the Interior
Washington, DC

Re: Request for Information and Comments on the Preparation of the 2017-2022 Outer Continental Shelf Oil and Gas Leasing Program, 79 Fed. Reg. 34,349 (June 16, 2014); BOEM-2014-0059.

Dear Secretary Jewell:

The following comments are being submitted to supplement those made on our behalf in a separate letter submitted by Sierra Weaver at Southern Environmental Law Center. Please consider both letters as an expression of our concerns about the referenced offshore leasing program.

In addition to serious threats related to extracting and burning fossil fuels, including extensive damage to the environment and economy vividly and disastrously illustrated by the 2010 BP oil spill, climate-related emission of greenhouse gases (GHGs) must be objectively evaluated in reaching decisions on all such policies.

On that point, it is extremely pertinent to consider various compelling justifications for the current Clean Power Plan now under EPA's public review process. To avoid the accumulating adverse consequences of wildfire, crop losses, reduced worker productivity, public health, sea-level rise, ocean acidification, flooding and drought, as well as brown-outs and power-plant failures, carbon emissions and methane leaks must be prudently restricted. If these dire consequences caused by climate change can justify the costs of implementing the Clean Power Plan (by a factor of 8:1), surely they will also significantly compound the other enormous risks of offshore oil and gas development (including those elucidated in the SELC letter).

By such reckoning, the cumulative consequences of GHG emissions generated in exploration, extraction, processing, distributing, and combustion of offshore oil and gas resources will be enormous. If the public is to be safeguarded against the worst consequences of climate change, oil and gas development must be curtailed by national policy, not promoted by it.

Hundreds of billions of dollars in adverse impacts can be avoided if offshore oil and gas resources of the Atlantic remain untapped. Documentation done as part of the EIS for the Clean Power Plan is directly relevant to this reasoning. Similar consequences, scaled proportionately to account for the life-cycle GHG-emission implications of the proposed offshore leasing program, will undoubtedly produce a well-justified calculation at a level of costs that must be considered in any forthcoming decisions about the program.

Indeed, given the range, severity, and prolonged carbon-and-methane-releasing implications of offshore fossil-fuel development, it seems certain that a responsibly objective and comprehensive assessment would conclude that the entire endeavor is not in the national interest.

It is essential that such an assessment is conducted and that realistic projections of future environmental, health, and economic costs are not misleadingly discounted (as is the common practice in C/B analysis) because the nature of climate change indicates an exponential trend of accumulative damage to vital life-support systems. Applying an artificial discount in any such endeavor will have the effect of falsely reducing the implications of cumulative future harm to essential resources/conditions – including human and wildlife habitat, quality of life, public health, food supplies, and economic vitality/stability, as well as the sustainability of all related policies and practices.

In light of these considerations, we strongly recommend a systemic, long-term assessment of the implications of the proposed offshore leasing program. To provide the greatest benefit in assisting responsible decision-making, this assessment must include realistic projection of global energy-use from all sources in terms of the environmental and economic consequences – above all, those related to climate change. Without such comprehensive study, no reliable policy can be formulated. A truncated evaluation will pose severe risks to the public and national interest. Moreover, an assessment method that discounts future impacts, especially those compounding the seriously adverse consequences of climate change, will produce misleading results due to escalating public risks in the 'out-years' of the evaluation period.

I appreciate the opportunity for our concerns to be considered in this review process. We trust that all comments will be carefully evaluated with appropriate deliberation due to the extreme importance of this and related issues.

Sincerely,

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