February 8, 2018

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

Dear Ms. Hammerle,

On behalf of the Cordell Bank National Marine Sanctuary Advisory Council (CBNMSAC), I am writing to respond to the call for public comment on the Bureau of Ocean Energy Management’s 2019-2024 National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program, as referenced in the Federal Register (83 FR 829).

Across all national marine sanctuaries, about $8 billion annually is generated in coastal economies from diverse activities like fishing, research, education, recreation, and tourism. Over 42 million people visit sanctuaries each year. From restaurants and hotels to aquariums and kayak operators, the success of many businesses, millions of dollars in sales and thousands of jobs, directly depend on thriving national marine sanctuaries.

The CBNMSAC brings together 14 stakeholder representatives from the community as well as representatives from government agencies to advise the Cordell National Marine Sanctuary (CBNMS) Superintendent. After discussion of the above-mentioned Draft Proposed Program, the CBNMSAC has resolved to express opposition to the inclusion of any portion of the Pacific continental shelf region in the 2019-2024 Draft Proposed Program that could impact CBNMS, including the expanded portion of CBNMS that was approved through the regulatory process, with overwhelming community support.

CBNMS was established to ensure protection now and into the future of an extraordinary marine ecosystem, home to an incredible abundance and diversity of sessile invertebrate life, a feeding destination and transit route for protected marine mammals, migrating seabirds, and fishes. Through oceanic currents and travelling marine life, CBNMS is not only intimately connected to nearby Greater Farallones National Marine Sanctuary, but also with the entire Pacific continental shelf region, including three other Pacific national marine sanctuaries. Opening these areas to oil and gas development threatens these precious habitats and marine wildlife. While regulations prohibit oil and gas development within CBNMS, we are concerned that such activities, with obvious potential for spills and leaks, may introduce oil into the sanctuary borders, or impact species that travel across its boundaries.

Voting Members

Community-at-Large Marin Co.  Community-at-Large Sonoma Co.  Conservation  Education
George Clyde  Sarah Hameed  Lance Morgan  Leslie Adler-Ivanbrook (Vice-Chair)
Michael Cummings  Bill Wolpert  Todd Steiner  Rebecca Detrich

Fishing  Maritime Activities  Research  Education
Richard Ogg  John Berge  Tessa Hill  Jaime Jahncke
Noah Wagner  Kevin Krick (Chair)
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In addition, as BOEM seeks to prepare a Programmatic EIS, it would be appropriate to consider that increased extraction and use of fossil fuels contributes further to the global problem of warming oceans and ocean acidification, which directly threaten the health of the CBNMS marine ecosystem and wildlife.

The future health of Cordell Bank National Marine Sanctuary depends on responsible steps we take today to protect it from harm. Thank you for your consideration of our comments.

Sincerely,

[Signature]

Leslie Adler-Ivanbrook
Vice-Chair, Cordell Bank National Marine Sanctuary Advisory Council

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The council is an advisory body to the sanctuary superintendent. The opinions and findings of this publication do not necessarily reflect the position of Cordell Bank National Marine Sanctuary and the National Oceanic and Atmospheric Administration.