



Audubon CONNECTICUT

February 8, 2018

Dr. Walter Cruickshank
Acting Director
Bureau of Ocean Energy Management
1849 C Street, NW
Washington, D.C. 20240

Dear Dr. Cruickshank,

On behalf of Audubon Connecticut, a state office of the National Audubon Society, and our four local Chapters, three Centers, and nearly 17,000 members across the state, **we respectfully request an extension of the March 9, 2018 deadline to submit comments on the Draft Proposed Program (DPP) for the 2019-2024 National Outer Continental Shelf (OCS) Oil and Gas Leasing Program, and on scoping for the required Programmatic Environmental Impact Statement (PEIS).** The Outer Continental Shelf Lands Act (OCSLA) provides for a 60-day comment period following the release of the DPP. **Given the large scope of the DPP, we believe a 60-day extension, pushing the deadline for comments to May 8, 2018, is necessary.** This would allow for more public hearings in communities and provide the public sufficient time to draft comments on the proposed expansion of offshore drilling to nearly all U.S. waters, encompassing over 90 percent of total OCS acreage – the largest number of potential offshore lease sales ever proposed.

Section 18 of OCSLA provides for the development of an oil and gas leasing program that considers “economic, social, and environmental values” of the resources of the OCS and the potential impacts of oil and gas exploration on “the marine, coastal and human environments.” Upon consideration of the comments received during the Request for Information period last year, this DPP identifies a preliminary list of OCS planning areas and a schedule for proposed lease sales during the 2019-2024 period. We are very concerned and disappointed with the inclusion of all new areas that were rightly excluded from the 2017-2022 program after a lengthy public engagement process.

The final 2017-2022 program was developed over three years and incorporated millions of comments from the public, scientists, industry, business owners and other stakeholders. The exclusion of the Arctic, Atlantic and Pacific Oceans, and Eastern Gulf of Mexico reflected the significant economic, social and environmental risks posed by oil and gas development in those areas, as well as strong community opposition. Local and regional concerns over offshore oil and gas activities have only grown since the 2017-2022 program was finalized, with more than 150 municipalities formally opposed to offshore drilling and/or exploration.

The opportunity for the public to provide input on the DPP and on scoping for the PEIS is dire given the new, large scope of the DPP and its potential impacts on coastal communities and economies, the marine environment and climate. Once again, the Bureau of Ocean Energy Management (BOEM) has scheduled “open house” meetings in each area included in the DPP to allow the public to ask questions of and provide feedback to BOEM employees, and has announced 23 meetings during the 60-day comment period that ends on March 9, 2018. We believe that neither the length of time, number of meetings, nor meeting format are adequate in order to meet the public input needs the DPP requires.



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There should be more meetings in coastal communities, large and small, in all areas included in the DPP, to allow for as many impacted voices as possible to raise their concerns. At the very least, all municipalities included during the DPP comment period for the 2017-2022 program should be included. In addition, formal oral testimony, as opposed to an "open house" format, would better ensure that people's concerns are heard and recorded publicly.

We respectfully request a full and fair opportunity for the most directly impacted stakeholders to provide feedback on the DPP and on scoping for the PEIS through an extension of the comment period deadline to May 8, 2018, meetings in more impacted communities, especially coastal, and the opportunity to offer formal, oral testimony.

Audubon Connecticut mission is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity. Our approach to this work involves us in a wide array of environmental, wildlife conservation, and human health concerns.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'L Kane', written in a cursive style.

Leslie Kane
Acting Director
Audubon CT