



VIA REGULATIONS.GOV ONLY

September 6, 2016

Abigail Ross-Hopper, Director
Bureau of Ocean Energy Management
1849 C Street, NW
Washington, D.C. 20240

Re: Lease Sale 244

Dear Director Ross-Hopper:

Please accept these comments on behalf of Cook Inletkeeper, a public interest organization formed by concerned Alaskans in 1995 to protect the Cook Inlet watershed and the life it sustains.

We've joined others in more detailed comments submitted on proposed Lease Sale 244, and would like to supplement the record with this additional information.

As a threshold matter, we're extremely disappointed in the Obama Administration's poor public process for this lease sale. For example, the NEPA scoping process was anemic and—to be perfectly frank—incompetent, with our organization and others receiving only a few hours' notice of the local scoping meeting. Then, at the public hearing in Homer on the draft EIS last month, BOEM flatly refused to answer any questions, instead hiding behind an obtuse and impersonal wall of federal laws and rules.

Next, your agency refused to grant Alaskans additional time to review the 600+ page DEIS, despite the fact BOEM announced the DEIS and the public comment period during the heart of the commercial, subsistence and personal use fishing seasons. Finally, you traveled from Washington, D.C. to Alaska during the public comment period for the Cook Inlet sale, yet you could only find time to meet with AOGA and the pro-oil side of the Alaska equation.

These process concerns reflect an ongoing and longstanding reluctance by BOEM and its predecessor to engage the people on the ground in Alaska who will be most affected by new exploration and development, and the risks they entail. This problem is exacerbated by OCSLA's regular and ongoing planning and leasing processes, which subject Cook Inlet residents

to a relentless, never-ending push to lease and development oil and gas in the waters that not only support our fishing and tourism economies, but also provide a quality of life unique in the world.

In fact, the relentless push to lease makes little sense economically, especially with current low oil and gas prices; although we are still waiting on FOIA information to understand exact federal expenditures, it's safe to say BOEM and MMS have spent tens of millions of dollars marshalling through Cook Inlet lease sales 191 (2004), 211 (2009), and 219 (2011), which resulted in no bids and no new leases. So, while groups such as the Resource Development Council in their recent comments on lease sale 244 say "BOEM should allow market dynamics to decide the fate of a future lease sale," we agree: after three lease sales in the past 12 years resulted in no bids, the Obama Administration should cut taxpayer losses, discontinue leasing for oil and gas, and move Alaska into the 21st century with more renewable energy leasing on the OCS.

As to the substance of the DEIS, it's incomprehensible in this day and age how or why BOEM refused to consider the end-product climate impacts from the sale, especially in light of the Obama Administration's lofty rhetoric and commitments around the Paris Climate Accords. In fact, Lease Sale 244 undermines the very commitments President Obama made in Paris.¹

When Alaskans around Cook Inlet talk about climate change, it's not from some theoretical or esoteric perspective. Instead, we talk about the thousands of acres of dead and dying spruce trees all around us, infested by an aphid which is flourishing in our warmer temperature regime. We talk about mass die-offs of sea otters and common murre; we experience first-hand sea star wasting disease and never-before-seen incidences of toxic alga; we lament the fact we have had no real winter in three years; and we have years of data showing alarming warming trends in our cold-water salmon streams.

Just last week, Anchorage broke its record high temperature by 7 degrees F.²

As climate change wracks our shores on a daily basis, oil and gas development remains highly controversial. That's why it's so important for BOEM to engage Alaskans in an authentic discussion about renewable energy on the OCS. Cook Inlet boasts world-class renewable power supplies—from the second highest tides in North America to prolific wind and solar potential—and BOEM can help make Alaska a leader in renewable jobs and technologies.

But to do so will take commitment from you and others in the Obama Administration. Towards that end, we invite to come back to Alaska to talk with Alaskans about climate change and renewable energy. We'd welcome such a discussion, and we'd ensure it was positive and productive.

¹ See, e.g., <https://www.sei-international.org/mediamanager/documents/Publications/Climate/SEI-PB-2016-US-fossilfuel-leases-climate.pdf>

² <http://www.adn.com/alaska-news/weather/2016/08/29/sundays-heat-blitzed-the-old-anchorage-temperature-record-for-the-date/>

Thank you for considering these comments on behalf of Inletkeeper and its more than 2500 members and supporters around Cook Inlet. Please feel free to contact me if you have questions or would like to arrange a meeting at 907.299.3277 or bob@inletkeeper.org

Yours for Cook Inlet,

A handwritten signature in black ink, appearing to read "Bob Shavelson". The signature is fluid and cursive, with a prominent initial "B" and a long, sweeping tail.

Bob Shavelson
Inletkeeper