



*Protecting  
the living  
environment  
of the  
Pacific Rim*

November 21, 2006

James F. Bennett  
Minerals Management Service  
5-Yr. Draft EIS Comments  
381 Elden St. MS 4042  
Herndon, Virginia 20170

RE: Comments on the Draft Environmental Impact Statement for Outer  
Continental Shelf Oil and Gas Leasing Program: 2007-2012

Dear Mr. Bennett:

Pacific Environment (“PE”) appreciates this opportunity to provide comments on behalf of our organization, members, and other interested individuals from around the world on the Draft Environmental Impact Statement (“DEIS”) for the proposed 5 Yr. Plan. As a non-governmental organization, PE works to protect the living environment of the Pacific Rim by strengthening democracy, supporting grassroots activism, empowering communities, and redefining international policies. We submit these comments in addition to our previous comments and are attaching hundreds of comment letters and emails that we have received from citizens who have great concerns about both the DEIS and Proposed Program.

As you are aware, there is significant international, national, and Alaskan opposition to this plan. At public meetings in rural Alaska, there were numerous voices raising extremely important issues concerning how this plan would impact traditional, subsistence lifestyles and important economic bases such as wild salmon fishing and tourism. In addition, both the ecological sensitivity of Alaska’s offshore areas and the lack of any proven technology to clean up oil spills in ice-rich environments merit a substantial analysis of the impacts of MMS’ proposed program. Unfortunately, the DEIS and public process afforded by the Minerals Management Service (“MMS”) fail to meet the requirements of the National Environmental Policy Act and other applicable laws, and we hereby request that MMS offer a completely new DEIS.

The DEIS is fundamentally flawed for a multitude of reasons. These include:

- a failure to offer a reasonable range of alternatives
- a failure to adequately characterize the status quo
- a failure to adequately analyze the environmental impacts of the action
- a failure to adequately address uncertain and unknown scientific information
- a failure to adequately address cumulative impacts
- a failure to adequately convey the level of controversy surrounding this program
- a failure to adequately address and achieve environmental justice
- a failure to adequately mitigate the impacts of the proposed action
- a failure to offer a legitimate public process

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These failures strike at the heart of the National Environmental Policy Act and cumulatively render the DEIS virtually meaningless. It is clear that MMS is more interested in justifying a decision that has already made instead of taking a 'hard look' at responsibly meeting our energy needs without causing irretrievable and irreversible environmental effects and disproportionate impacts to traditional subsistence cultures already facing severe impacts from oil and gas development, climate change, and other industrial threats. Instead, both the public and the decision-maker are offered a mixture of glaring omissions, inconsistent statements, and conclusions that bear no rational relation to the facts.

In light of the fact that MMS proposes unprecedented oil and gas exploration and development in critical habitat for some of the world's most endangered whales, our nation's richest fisheries, and in areas critical to the preservation of the Arctic and the communities that depend upon its ecological health, the agency must 'return to the drawing board' and undertake a sound environmental impact analysis that affords the public and decision-maker an honest assessment of and alternatives to the Proposed 5-Yr. Outer Continental Shelf Oil and Gas Leasing Program for 2007-2012.

Sincerely,

Whit Sheard  
Alaska Program Director  
Pacific Environment