



November 24, 2006

Renee Orr
5-year Program Manager
381 Elden Street, MS 4010
Herndon, VA 20170

*Protecting
the living
environment
of the
Pacific Rim*

RE: Comments on the Proposed Program for Outer Continental Shelf Oil and Gas Leasing Program: 2007-2012

Dear Ms. Orr:

Pacific Environment (“PE”) appreciates this opportunity to provide comments on the “Proposed Program Outer Continental Shelf Oil and Gas Leasing Program 207-2012” (the “Program”). 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 have separately submitted hundreds of comment letters and emails that we have received from citizens who have great concerns about both the Draft Environmental Impact Statement and Proposed Program.

As you are aware, there is significant international, national, and Alaskan opposition to the Program. The most compelling comments have been from individuals in rural Alaska who raise extremely important issues concerning how the Program would impact sensitive ecological regions and the traditional subsistence lifestyles that are intertwined with the health of our oceans. In addition, we have consistently heard from these individuals, other concerned citizens and scientists that 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 ‘timeout’ for offshore development in Alaska. Instead of heeding these voices, however, MMS continues to push an overly aggressive Program that ignores good science and that will zone our Arctic seas for oil and gas development at the expense of the Arctic environment and cultures that have persisted for millennia.

The Program is centered upon continuing our addiction to oil and proposes to sacrifice rich ecological areas such as Bristol Bay and the entire Arctic in order to supplement a small percentage of national oil and gas production. The Program impermissibly devalues subsistence, the nation’s richest fishing grounds, critical habitat for the most endangered whales on the planet, and cultural heritage. Indeed, the only reason for MMS to aggressively pursue oil and gas development in the only region where it is proven that industry cannot clean up spills is because these rural communities lack the political and economic clout wielded by the rest of the nation who simply do not want development off their shores.

The Program also fails to seriously consider eliminating the ecological and cultural damage that will admittedly occur by substituting a combination of readily available alternative

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technologies and conservation. Despite the availability of alternative programs, however, MMS instead proposes a Program that will cause irreversible and irretrievable commitments of resources in Alaska. This is bad policy for a multitude of reasons, including:

- The Program will disproportionately impact indigenous cultures
- The Program will compromise critical habitat for the imperiled eastern stock of North Pacific right whales and other endangered, threatened, and depleted species
- The Program will compromise a variety of important subsistence resources, including seals, beluga whales, bowhead whales, salmon, waterfowl, and caribou
- The Program will accelerate climate change
- The Program disproportionately impacts the Arctic and its biological resources, which are already facing stress from climate change
- The Program will compromise our nation's richest fishing grounds

As such, the Program simply cannot go forward as proposed. MMS must go back to the drawing board and craft a Program that adequately balances the needs of our nation with the health of our ecological and cultural heritage. All proposed lease sales off Alaska must be cancelled and an alternative Program must be developed.

Sincerely,

Whit Sheard
Alaska Program Director
Pacific Environment