Comments to the Bureau of Ocean Energy Management (BOEM)
regarding Offshore Drilling on the Oregon Coast

I am fortunate to live on the Oregon Coast near a small town called Neskowin, on the north side of Cascade Head, between the Salmon River and Nestucca River estuaries. I can see the Pacific Ocean from my home, and every day I marvel at its power, beauty and many moods. The idea of risking that environment - as well as the tourism and seafood industries that depend upon that ocean - just to withdraw a few million barrels of fossil fuel, is abhorrent to me. My 19 years as Executive Coordinator for the Pacific States/British Columbia Oil Spill Task Force, from which I retired in 2012, provides me with the experience to understand those risks.

Considering the cost/benefit analysis, there are a number of reasons why oil companies may also recognize the risks associated with drilling off the Oregon Coast and choose to avoid them. Estimates of oil available off the Oregon Coast are low; BOEM estimates a possible 810 million barrels, approximately 1/90 of the 73 billion barrels estimated to be in the Gulf of Mexico. At the current price of oil, recovery of such a small amount may not even be economical, although the prices could change. Risks to the operators would be high in such an environment; the name "Pacific" is definitely a misnomer in the Northeast quadrant of this ocean, where winter storms, large waves and high winds are the norm. Moreover, the ever-present risk of a major Cascadia Subduction zone earthquake and tsunami should also be considered by potential drillers.

The impacts of an oil spill on coastal tourism and fishing industries would be catastrophic. If even a small amount of oil reached the salmon and shellfish nurseries in our estuaries, damages would be both lethal and long-lasting. As was demonstrated in the Gulf of Mexico after the Deepwater Horizon oil spill, just the perception of dirty coastlines, oiled birds and contaminated seafood was sufficient to cause economic hardship for local communities dependent on tourism and fishing.

To make matters worse, the Bureau of Safety and Environmental Enforcement (BSEE), BOEM's sister agency, has recently proposed changes to their regulations that would increase the risk of oil spills from offshore drilling operations. In a proposed rule released for public comment on December 28, 2017, for example, BSEE would eliminate a requirement that safety and pollution prevention equipment be inspected by independent auditors certified by BSEE, as recommended by a bipartisan presidential commission established after the Deepwater Horizon disaster.

Instead, under their proposed regulations, oil companies would use industry-set "recommended practices" for ensuring that safety equipment works — as was done before the Deepwater Horizon incident. Nancy Leveson, a professor at the Massachusetts Institute of Technology who served as a senior adviser to the presidential commission, stated that recommended practices by industry groups such as the American Petroleum Institute "are simply that — they make recommendations but don't

require anything." The comment period for these proposed regulatory changes ended on January 28, 2018.

The *Washington Post* reports that additional regulatory changes, still under review by the Office of Management and Budget, would affect pressure tests, which failed in the Deepwater Horizon disaster. The existing well-control rule requires that companies complete any investigation and failure analysis within 120 days of an equipment failure. The proposed rule, by contrast, calls for this process to start within 120 days and provides no specific completion deadline.

BSEE also oversees contingency planning for offshore oil drilling operations. Even without changes to those regulations, they are less prescriptive than those of the State of Oregon (and other West Coast states), especially in the area of response times/benchmarks used to calculate boom deployment times, recovery efficiency and time.

Should an oil spill from a drilling operation occur off the Oregon coast in the winter months, deployment of spill response vessels from Oregon's ports might be hampered by the closure of bar crossings in a few of our major ports (Astoria or Coos Bay, for example). Moreover, we would be highly reliant on the U.S. Coast Guard (USCG). While the USCG has personnel at numerous locations on the Oregon Coast, I note that Congress just cancelled the 9 cent per barrel fee on crude and petroleum products that was the primary source of revenue to the Oil Spill Liability Trust Fund, a fund that enables the USCG to spend the maximum amount set in law for response to a major oil spill ($1 billion), thus protecting American taxpayers from paying to clean up oil spills caused by the fossil fuel industry.

If oil were found offshore, the pipes to carry it onshore and the facilities to process it and support the drilling activities would be sited in Oregon. I'm counting on the State of Oregon to "just say no" when they are given a voice in this decision-making process through the Coastal Zone Management Act and land use permit decisions.

I observe the power of the Pacific Ocean every day; BOEM should harness that power by permitting tidal or wave energy projects, which would be consistent with the spirit of the 21st century. Desperate searches for fossil fuel in inappropriate locations is just too 19th century and should not occur off the Oregon Coast. BOEM should acknowledge the folly of granting leases off the Oregon coast and save themselves - as well as our state agencies and concerned citizens - a lot of trouble by simply removing the Oregon Coast from their offshore drilling permit maps.

Thank you for this opportunity to comment.