Final Scoping Report

Programmatic EIS for the 2017-2022 Outer Continental Shelf Oil and Gas Leasing Program

May 2015

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Document No. CSA-BOEM-FL-15-1570-2757-04-REP-01-FIN

Version	Date	Description	Prepared by:	Reviewed by:	Approved by:
01	4/20/15	Initial draft for review	M. Cahill, E. Hodel, A. Pittman	D. Medellin	M. Cahill
02	5/5/15	Revised draft	M. Cahill, E. Hodel, A. Pittman	N. Kraft	M. Cahill
03	5/13/15	Revised Concurrence Draft	M. Cahill	K. Olsen	K. Olsen
FIN	5/18/15	Final	M. Cahill	K. Olsen	K. Olsen

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List of Acronyms

BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
DPP	Draft Proposed Program
EFH	Essential Fish Habitat
EIS	Environmental Impact Statement
FR	*Federal Register*
GIS	geographic information systems
HAPC	Habitat Area of Particular Concern
MPA	Marine Protected Area
NASA	National Aeronautics and Space Administration
NEPA	National Environmental Policy Act
NGO	nongovernmental organization
NMS	National Marine Sanctuary
OCS	Outer Continental Shelf
OCSLA	Outer Continental Shelf Lands Act
U.S.	United States
U.S.C.	United States Code
USDOI	United States Department of the Interior

1. INTRODUCTION AND BACKGROUND

Section 18 of the Outer Continental Shelf Lands Act (OCSLA) (43 United States Code [U.S.C.] 1344) requires the Secretary of the United States Department of the Interior (USDOI) to prepare a five-year schedule that specifies the size, timing, and location of areas to be assessed for Outer Continental Shelf (OCS) oil and gas leasing. On January 29, 2015, the Draft Proposed Program (DPP) for a 2017-2022 leasing program was published. The DPP includes eight Planning Areas: three in the Gulf of Mexico (GOM), two in the Atlantic, and three offshore Alaska (**Figure 1**). The DPP schedules 14 potential lease sales in those areas for the 2017 to 2022 period: 10 sales in the GOM, 1 in the Atlantic, and 3 off the coast of Alaska. **Table 1** provides the schedule of lease sales.

The OCSLA also requires that the OCS program is managed to ensure a proper balance between oil and gas production, environmental protection, and impacts to the coastal zone. The USDOI's Bureau of Ocean Energy Management (BOEM) manages the leasing, exploration, and development of the nation's offshore oil and gas resources; this responsibility includes preparation and implementation of the Five-Year Oil and Gas Leasing Program.

Table 1. Schedule of Lease Sales.

	Sale Number	Area	Year
1.	249	Gulf of Mexico Region	2017
2.	250	Gulf of Mexico Region	2018
3.	251	Gulf of Mexico Region	2018
4.	252	Gulf of Mexico Region	2019
5.	253	Gulf of Mexico Region	2019
6.	254	Gulf of Mexico Region	2020
7.	255	Beaufort Sea	2020
8.	256	Gulf of Mexico Region	2020
9.	257	Gulf of Mexico Region	2021
10.	258	Cook Inlet	2021
11.	259	Gulf of Mexico Region	2021
12.	260	Mid- and South Atlantic	2021
13.	261	Gulf of Mexico Region	2022
14.	262	Chukchi Sea	2022

Alaska Region Lease Sale
Atlantic Region Lease Sale
Gulf of Mexico Region Lease Sale

BOEM must comply with numerous environmental statutes, regulations, and executive orders to carry out this mission. In implementing regulations (40 Code of Federal Regulations [CFR] parts 1500 to 1508) per the National Environmental Policy Act (NEPA) of 1970 (42 U.S.C. 4371 *et seq.*), the Council on Environmental Quality requires agencies to "utilize a systematic, interdisciplinary approach which will ensure the integrated use of the natural and social sciences and the environmental design arts in planning and in decision making which may have an impact on man's environment." BOEM complies with this requirement in part through the development of a Programmatic Environmental Impact Statement (EIS) for the Five-Year Oil and Gas Leasing Program. The Programmatic EIS offers a program-level national assessment of the potential environmental effects of holding lease sales in the specified five-year period. It also will analyze reasonable alternatives to the proposed lease sale schedule and mitigation measures that may reduce or eliminate any potential impacts. The Programmatic EIS serves as a reference document to implement the "tiering" and "incorporation by reference" objectives detailed in NEPA's implementing regulations (40 CFR part 1502.20); future lease sale or site-specific EISs or environmental assessments may tier from and reference appropriate sections of this Programmatic EIS to reduce reiteration of the same issues and effects, allowing subsequent analyses to focus on specific issues and effects related to a particular lease activity.

The issuance of a Notice of Intent to prepare this Programmatic EIS starts the formal scoping process for an EIS under 40 CFR part 1501.7 of the Council on Environmental Quality regulations and solicits input from the public regarding alternatives to the proposed action, impacting factors, environmental resources and issues of concern in the DPP area, and possible mitigating measures that should be evaluated in the EIS.

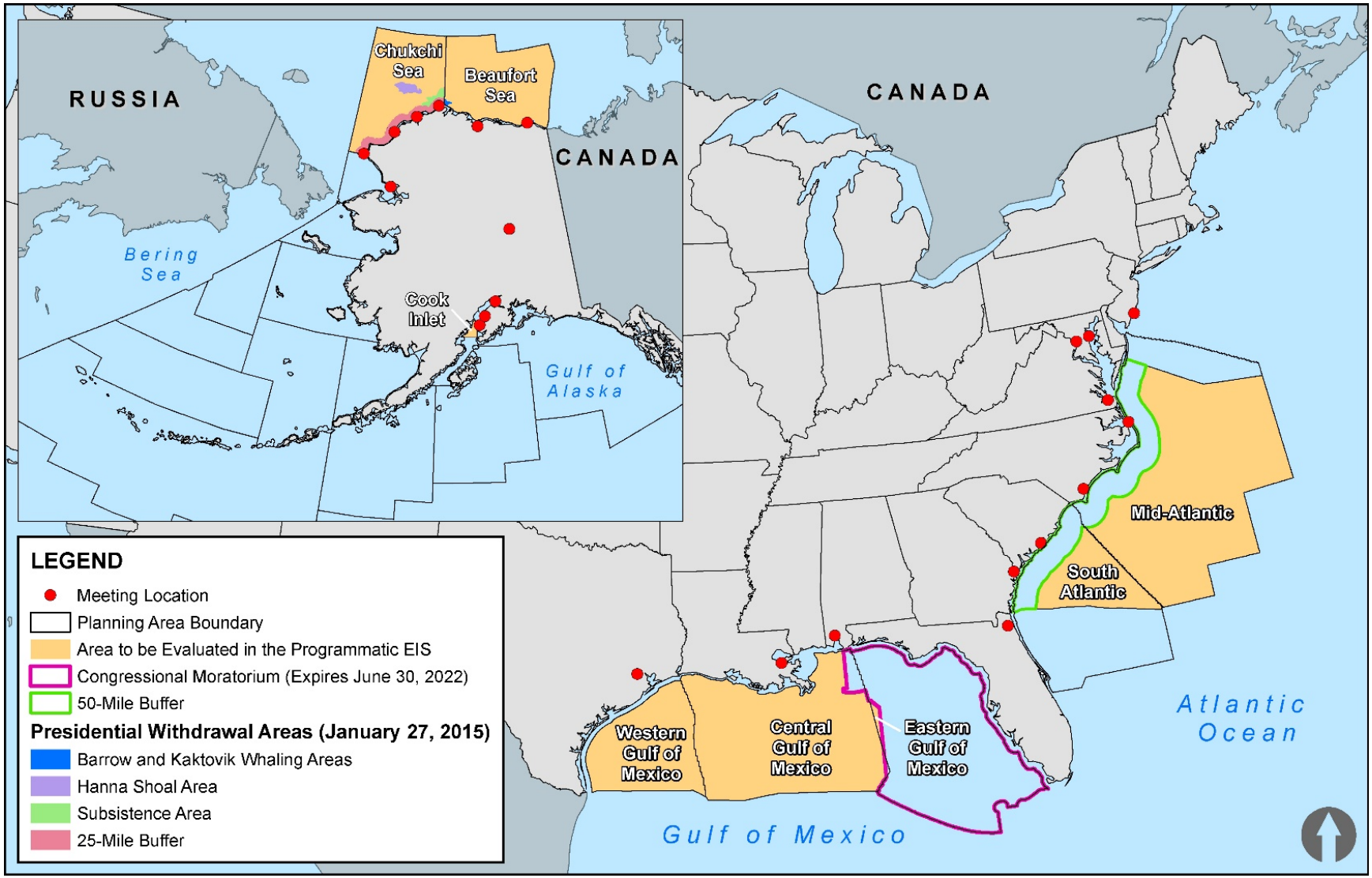

Figure 1. Planning Areas to be Evaluated in the Programmatic Environmental Impact Statement and Meeting Locations in Each Region.

2. SCOPING PROCESS

The Notice of Intent for the Programmatic EIS was published in the *Federal Register* (19 FR 4939) on January 29, 2015, initiating the 60-day scoping comment period and announcing the schedule of scoping meetings. There were 20 meetings scheduled in three BOEM regions in the U.S., including the Chukchi Sea, Beaufort Sea, and Cook Inlet Planning Areas in Alaska; the Western, Central and portions of the Eastern Planning Areas in the GOM; and the Mid- and South Atlantic Planning Areas along the east coast of the U.S. On March 6, 2015, a notice was published in the *Federal Register* (44 FR 12204) to add three additional scoping meetings along the U.S. east coast, resulting in a total of 23 meetings being planned. The meeting in Point Hope, Alaska was not held due to poor weather conditions; however, BOEM was able to communicate with village officials by phone. Meeting locations and dates are provided in **Table 2**.

The purpose of scoping is to determine the appropriate content for a focused and balanced Programmatic EIS by (1) ensuring significant issues are identified early and properly studied during development of the Programmatic EIS; (2) identifying alternatives, mitigation measures, and analytic tools; and (3) identifying insignificant issues and narrowing the scope of the Programmatic EIS. This report presents a summary of the stakeholder comments that were received during the January 29, 2015 to March 30, 2015 scoping period for consideration in preparing the Draft Programmatic EIS. It does not present individual comments received or provide individual responses to the comments. Instead, the report outlines important issues raised in the comments.

2.1. APPROACH

Stakeholder participation in the Programmatic EIS scoping was accomplished through public meetings, by electronic input (via website), by U.S. Postal Service mail, or in person to an appropriate BOEM official (**Section 2.1.2**). The general objective of the scoping process was to ensure that the public's opinion is considered with regards to the scope of the Programmatic EIS and that stakeholder participation resulted in stakeholders gaining a comprehensive understanding of the proposed program that produced useful and information-rich comments.

2.1.1. Open House Meeting Format

Public meetings were held in an open house format in states along the Atlantic and GOM coasts as well as in Anchorage, Alaska, which included a series of informational stations manned by BOEM and Bureau of Safety and Environmental Enforcement (BSEE) staff and contractors. The purpose of the open house style public meeting was to provide participants with an opportunity to learn more about the scoping process and the proposed action at their own pace, ask questions, interact with BOEM staff, and then provide comments. The open house meeting format included informational stations with an introductory video explaining the process, posters and handouts designed to elicit pertinent comments (**Appendix A**), and a comment station where participants could submit comments electronically using provided laptops or manually using paper forms. BOEM staff members were able to clearly communicate the purpose of the Programmatic EIS to the public at a personal level and listen to public concerns. This format differed from previous scoping meetings held by BOEM, which have typically included a BOEM presentation and then oral testimony by members of the public in front of all the attendees.

2.1.2. Informal Family Style Meeting Format

The informal family style format was used for all meetings held on the North Slope and Cook Inlet, Alaska. This format included informal presentations by BOEM staff supported by informational handouts (same as for open houses) and informal discussions with stakeholders. Participants were invited to provide oral comments that were documented by BOEM representatives.

Table 2. Meeting Locations, Dates, Times, Participation, and Number of Comments Provided.

Meeting Location	Meeting Date and Time	Number of Attendees	Number of Hard Copy Comments Received
National			
Washington, D.C. Embassy Suites	February 9, 2015, 2-7 pm, EDT	71	6
Mid- and South Atlantic Planning Areas			
Norfolk, VA Sheraton Norfolk Waterside	February 11, 2015, 3-7 pm, EDT	168	22
Wilmington, NC Blockade Runner	February 17, 2015, 3-7 pm, EDT	419	76
Jacksonville, FL Hyatt Regency Riverfront	February 19, 2015, 3-7 pm, EDT	47	2
Annapolis, MD Loews Annapolis	March 9, 2015, 3-7 pm, EDT	53	2
Charleston, SC Wyndham Garden	March 11, 2015, 3-7 pm, EDT	222	18
Kill Devil Hills, NC Ramada Plaza	March 16, 2015, 3-7 pm, EDT	707	176
Atlantic City, NJ Sheraton Atlantic City	March 18, 2015, 3-7 pm, EDT	66	6
Savannah, GA Hyatt Regency	March 24, 2015, 3-7 pm, EDT	148	27
	Regional Subtotal	1,830	329
Gulf of Mexico Planning Areas			
Houston, TX Houston Marriott West Loop	February 23, 2015, 3-7 pm, CST	44	2
New Orleans, LA University of New Orleans	February 25, 2015, 3-7 pm, CST	16	0
Mobile, AL Mobile Marriott Hotel	February 26, 2015, 3-7 pm, CST	2	0
	Regional Subtotal	62	2
Alaska Planning Areas			
*Fairbanks, AK Westmark Hotel	February 9, 2015, 7-10 pm, AKST	21	9
*Ninilchik, AK Ninilchik School	February 11, 2015, 7-10 pm, AKST	4	0
*Soldotna, AK Kenai Peninsula Borough Assembly Chambers	February 12, 2015, 7-10 pm, AKST	2	0
*Nuiqsut, AK Kisik Community Center	February 16, 2015, 7-10 pm, AKST	Not recorded	1
*Barrow, AK Inupiat Heritage Center	February 17, 2015, 7-10 pm, AKST	26	2
*Kaktovik, AK Kaktovik Community Center	February 18, 2015, 7-10 pm, AKST	12	Notes**
*Wainwright, AK R. James Community Center	February 19, 2015, 7-10 pm, AKST	15	Notes**
*Kotzebue, AK Northwest Arctic Borough Assembly Chambers	February 23, 2015, 7-10 pm, AKST	5	Notes**
*Point Lay, AK Point Lay – Kali School	February 24, 2015, 7-10 pm, AKST	8	Notes** +1
*Point Hope, AK City Qalgi Center	February 25, 2015, 7-10 pm, AKST	Meeting not held due to weather	
Anchorage, AK Anchorage Marriott Downtown	March 2, 2015, 3-7 pm, AKST	86	8
	Regional Subtotal	179	20
	Total	2,142	357

*Informal family style meetings. **Informal family style meetings did not collect comments, instead BOEM representatives took notes.

2.1.3. E-Scoping

The Programmatic EIS addresses issues of national significance, and it is critical that scoping included input from a wide audience in addition to those near scoping meeting locations. Therefore, electronic scoping (e-scoping) was utilized and strongly encouraged through enhanced public outreach (e.g., expanded media outlets, user-friendly graphic materials [**Appendix A**]). The project website, www.boemoceaninfo.com, was the central location for electronic information about this project. The project website included background information on the project (e.g., NEPA, Programmatic EIS, scoping process, etc.), fact sheets, press releases, and other outreach materials that were available for download. The website included an informative video to provide visitors with a quick, visual way to learn about the scoping process, guidance on how to provide comments of greatest utility, and an electronic interface to submit electronic comments. Future public scoping meetings were listed on the website and meeting information (location, time, and date) could be downloaded and saved to personal calendars.

The project website highlighted links to two key resources: (1) Regulations.gov – the sole source for submitting electronic comments; and (2) the GeoPortal, a geographic information systems (GIS)-based platform where users could view and select data on a map as an educational tool and input into the public comment process.

Regulations.gov is the official website for submitting comments to proposed regulations and documents posted in the *Federal Register*. Submitted comments were forwarded directly to the comment tracking database in weekly exports.

The GeoPortal (https://www.csawebmap.com/boemoceaninfo/) was developed as a standalone resource, with links and easy access from the project website. The GeoPortal contained interactive GIS maps of potential lease areas, and provided users with the ability to view and draw on relevant data layers. Data compiled on the GeoPortal were obtained from authoritative data sources and an inventory included source information and data download dates to ensure the most recent available data were used. Additionally, users were able to view specific resource data in specific areas of interest, utilize tools to view an area of interest, and create maps to support their electronic comments submitted via Regulations.gov. Users were encouraged to identify geospatial data gaps and share recommendations for additional data resources that could be integrated with the GeoPortal.

E-scoping elicited stakeholder comments from 47 of the 50 states in the U.S. and from three other countries (Germany, United Kingdom, and Canada). Additional information about commenting participants is provided in **Section 2.2**. Traffic to the project website included more than 10,847 visitors from all 50 states, with the highest number of website views coming from North Carolina (1,843 visitors). Traffic was primarily directed to the website from direct (41.3 percent) and referral visits (39 percent) (i.e., from links or direct typing of address or from another website hosting the link). The complete Website Analytics Report is provided in **Appendix B**.

2.2. SCOPING MEETING ATTENDANCE AND PARTICIPATION

Figure 1 shows the meeting locations in each region, and **Table 2** presents the number of attendees and comments received at each of the meetings.

Scoping meeting participation was highest in the Atlantic Planning Areas (**Figure 2**), with more than 1,800 registered participants. Within the Atlantic Planning Areas, the meetings in North Carolina were the most attended; the Outer Banks meeting had 707 participants and Wilmington had 419 participants. The high number of meeting participants in North Carolina is linked to the efforts of a consolidated group of environmental nongovernmental organizations (NGOs) that held informational meetings and rallies at adjacent venues to the scoping meetings. As a consequence of this effort, the opposition to leasing was organized and participants provided targeted, specific comments prepared ahead of time and handed in at the meeting (**Table 2**).

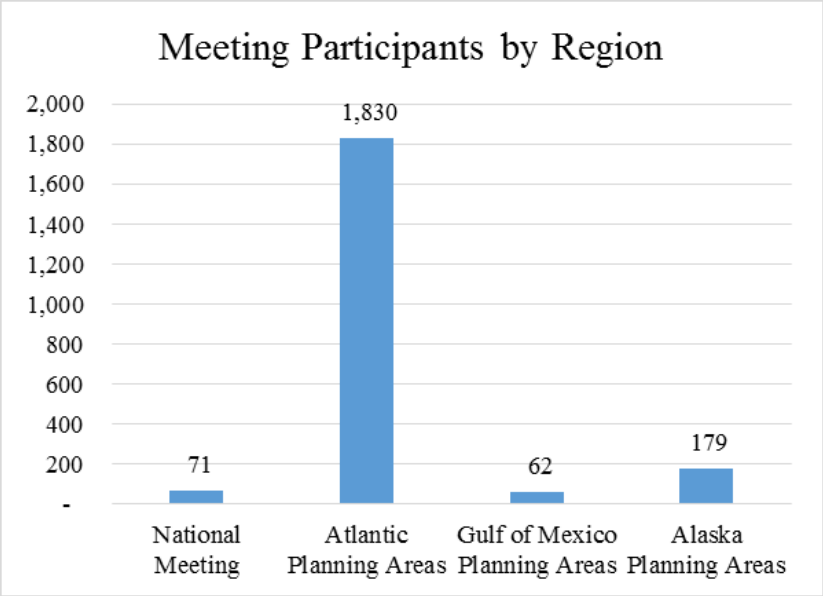

Figure 2. Number of Participants in Attendance at the Scoping Meetings.

The meeting format was an innovative approach to scoping, but participant comments were divided on the effectiveness of the new format. Many participants were in favor of the meeting format stating their appreciation for the opportunity to interact one-on-one with BOEM staff and praised the value of the informational stations, while others felt that the lack of oral testimony was detrimental to the process, and prohibited sharing ideas and opinions with their peers. Comments indicated an appreciation for the provided computer stations, and as such the primary method of delivery of comments was through Regulations.gov (**Figure 3**).

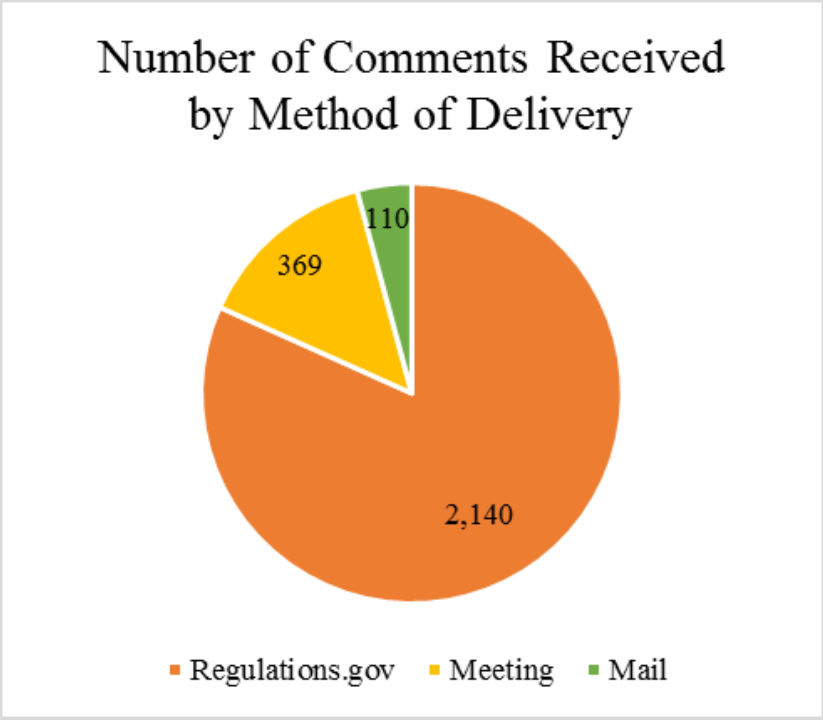

Figure 3. Number of Unique Comments Received by Method of Delivery.

A total of 2,619 unique comments were received from a diverse assemblage of stakeholders (**Table 3**), including a large number (2,360) of comments from private citizens. Other stakeholder groups or organizations that provided comments included numerous environmental NGOs, government entities (e.g., local municipalities, county, state, and elected officials), local businesses, industry, academic institutions, tribal or cultural groups from the Alaska and Atlantic Planning Areas, and industry NGOs. **Appendix C** provides a list of the stakeholder groups. Form letters or petitions received from different organizations totaled 377,092 letters/signatures and are described in **Section 3.7**.

Table 3. Number of Comments Received from Stakeholder Groups.

Stakeholder	Number of Comments
Private Citizen	2,404
Environmental NGO	88
Industry	34
Local Government	31
Business	26
State Government	21
Academia	6
Tribal/Cultural	4
Federal Government	3
Industry NGO	2

NGO = nongovernmental organization.

2.3. SCOPING COMMENT REVIEW

As public scoping comments were received, a team of scientists reviewed and systematically categorized each comment and associated attachments into a comment database based on Microsoft SQL Server Database Technology. Categories of expected topics of interest were developed based on review of recent, relevant environmental analysis documents. The database and associated input and reporting services allowed for efficient management, tracking, and distribution of the scoping comments to the various subject matter experts responsible for the relevant sections of the Programmatic EIS. Comment review was conducted based on explicit concerns; comments that were not specific or contained vague statements were not interpreted by the reviewers.

Based on the information received during the scoping period, such as the location of sensitive natural resources, estimates of oil and gas resources, or projected oil and gas activity, alternatives to the proposal will be identified that might reduce possible impacts. In addition, any reasonable measures suggested to mitigate possible impacts are considered for analysis in the Programmatic EIS.

Comments that provided substantive information (**Section 3.5.2**) were reviewed by the project's technical lead to ascertain the validity of information provided and extract the relevant information for distribution to authors. Similarly, the comments containing geospatial references were distributed to the geospatial analysts for use in developing the geospatial database.

The database allowed queries and reports to be run to identify content for a focused and balanced Programmatic EIS by (1) ensuring significant issues are identified early and properly studied during development of the Programmatic EIS; (2) identifying alternatives, mitigation measures, and analytic tools; and (3) identifying insignificant issues and narrowing the scope of the Programmatic EIS.

3. SUMMARY OF SCOPING COMMENTS

The following discussion provides an overview and summary of the categories of issues presented in the scoping comments during the scoping period. The summary does not evaluate the individual comments, nor does it determine or indicate which comments are viewed as being within or outside the scope of the Programmatic EIS. Inclusion of an issue is for the record only; the Draft Programmatic EIS will scope issues in or out. The wording is intended to categorize and summarize the substance of the

comments, not reproduce the exact wording of individual comments. There was a wide range of interest and opinions about the 2017-2022 OCS Oil and Gas Leasing Programmatic EIS, and the comments summarized in each category illustrate the varied and, at times, contradictory issues, concerns, and desired future conditions expressed by individuals, organizations, industry, and public agencies.

3.1. CONCERNS AND POSITION TOWARDS OFFSHORE OIL AND GAS LEASING AND DEVELOPMENT

Comments received that explicitly stated a position were associated with an impact-producing factor. In all areas, most comments in opposition were directly focused on environmental impacts such as an oil spill and the associated risks and impacts. Comments regarding oils spill concerns are summarized in **Section 3.3.3**. The mention of positive impacts and support of the activities typically was coupled with reasoning associated with economics, market stability, reduced reliance on foreign oil, and supply of the nation's energy needs. The positive economic impacts described were associated with infrastructure, revenue sharing, and job creation and retention (**Section 3.4.1**). Within the category of impact-producing factors, subcategories included the following:

- Drilling impacts (impacts specifically related to drilling, [e.g., muds, discharges]);
- Production and development (broader scope of impacts related to the oil and gas industry as a whole);
- Seismic surveys;
- Impacts from infrastructure expansion (e.g., ports, waterways, pipelines, holding, processing, and transfer facilities, onshore transport);
- Vessel traffic; and
- Cumulative impacts.

Comments regarding the Atlantic Planning Areas primarily stated opposition to all oil and gas related activities and many were specific only to seismic surveys, which is not the primary focus of this Programmatic EIS. A number of the comments that provided literature or documentation were related to impacts (or lack of impacts) associated with seismic surveys. Noise increase associated with oil and gas activities in general also was stated as a concern.

A number of comments brought up the results (both positive and negative) that may be associated with expanded infrastructure that may be required in the Atlantic Planning Areas to support the industry. Comments expressed concern that the existing ports and waterways as well as onshore rails and roads could not support the industry and would need to be expanded. Construction of onshore infrastructure for processing, holding, and transport (pipelines) in the production phase had comments that supported and other comments that opposed this expansion. Those in opposition stated impacts to coastal areas from this expansion while those in support viewed it as a source of jobs and income. Offshore infrastructure (e.g., platforms, tankers, vessels) also was mentioned as a potential source of impact to the environment and as a view-shed issue that may impact tourism, recreation, and local lifestyle. Vessel traffic impacts typically were mentioned in association with concerns for potential interaction with marine mammals, commercial fisheries, and recreation and tourism.

Comments specific to the GOM Planning Areas did not explicitly state opposition or support for oil and gas activities. Some comments referenced the Eastern Planning Area closure (**Section 3.2**). Other comments indicated that the GOM should not be further leased until existing leases are utilized, and some mentioned that the existing offshore infrastructure should be fully decommissioned if not in use before more activity occurs. Numerous comments referenced the *Deepwater Horizon* event in the GOM (**Section 3.3.3**).

Comments pertaining to the Alaska Planning Areas were primarily in favor of limiting or excluding Alaska's Arctic waters from the Five-Year Program (**Section 3.2.1**). Concerns were raised over the difficult working conditions that Alaska's weather creates and the resultant higher risk for accidents; this was often coupled with discussion of oil spill response abilities and infrastructure (**Section 3.3.3**).

3.2. ALTERNATIVES FOR THE PROGRAMMATIC EIS

Comments received that explicitly mentioned alternatives or mitigations that should be implemented were categorized and reviewed based on subcategories, including areas suggested for deferral or addition, mitigations or technology, renewable energy recommendations, and "other". There were numerous comments voicing support of alternative and renewable energy sources over fossil fuels, suggesting that it should be analyzed as an alternative in the Programmatic EIS. Each of the substantive comments suggesting alternatives was reviewed by BOEM and considered during development of the alternatives.

3.2.1. Deferral Areas and Additional Areas Recommendations

In the Atlantic Planning Areas, the majority of the comments associated with exclusion areas were not specific and simply stated a preference to remove all of the Atlantic Planning Areas from the Programmatic EIS. The desire for prohibition of leasing was often coupled with concerns of negative impacts to environmental resources and economic impacts to tourism and recreation, coastal lifestyle, and commercial fishing (**Sections 3.3** and **3.4**). There were some specific recommendations that an alternative should be developed that excludes the Atlantic leases. Comments specified concern that the 50-mile buffer zone included in the DPP was not an adequate corridor for protection of the North Atlantic right whale and other marine mammals and sea turtles. Other comments stated that the buffer did not provide protection from possible oil spill effects to coastal environments.

GOM-related comments specific to exclusion areas were focused on the Eastern Planning Area and were either in support of or against the exclusion area proposed in the DPP. Some comments pointed to the inadequacy of current regulations, typically combined with criticism of the *Deepwater Horizon* oil spill response, and recommended that no future leasing should occur based on that. No comments were received regarding specific buffers in the GOM Planning Areas.

In the Alaska Planning Areas, comments were received both in favor of and opposed to the program area identified in the DPP. Many felt the existing Presidential withdrawal areas were inadequate to protect the wildlife as well as the local subsistence communities. Specific recommendations were received with biological data and information to support the reasoning for additional exclusion or closure areas in the Chukchi and Beaufort Planning Areas. Scoping comments received during the meetings with the villages along the North Slope were focused on the cultural and subsistence uses of the Native Villages and the need for additional Presidential withdrawal or exclusion areas. Participants recommended expansion of the exclusion areas to include: the stretch between Camden Bay to Kaktovik, all of Cross Island, and along the coast adjacent to the Arctic National Wildlife Refuge.

In all Planning Areas, comments in support of leasing associated it with improving the economy, market stability, reduced reliance on foreign oil, and a local supply of the nation's energy needs. The positive economic impacts described were associated with infrastructure, revenue sharing, and job creation (**Section 3.4**). In the Atlantic Planning Areas, a few comments recommended including the entire Mid- and South Atlantic Planning Areas and removing the 50-mile buffer. In the GOM, the Eastern Planning Area was recommended for inclusion. Comments also indicated the need to conduct a full analysis of the entire Planning Areas, regardless of the buffers and no-activity zones because biological resources will occur throughout the area.

3.2.2. Include Alternatives with More Rigorous Mitigations and Advanced Technology

Recommendations were received for landscape and regional level approaches to mitigations for all impact-producing activities. Specific mitigation suggestions were not identified, but rather the comments generally referenced that mitigation measures should be implemented and required by regulations to prevent oils spills, protect environmental resources, and ensure no space-use conflicts result from oil and gas activities. Many of the comments referencing improved regulations were specific to oil spill prevention and response preparedness.

Conversely, some comments stated that mitigations should not be put in place that are prohibitive to operations, should ensure that standards are based on practicalities, and should not be extensive or constrain advancement of oil and gas activities. Comments also suggested that redundant standards should be removed. In addition, it was mentioned that an adaptive management approach to mitigation should be undertaken to ensure that the Programmatic EIS is useful for future offshore oil and gas development.

Regarding technology, some comments stated that the current technology does not allow for oil and gas activities to be conducted in a safe manner, while other comments expressly noted the advances that have occurred in technology for better and safer operations, specifically since the *Deepwater Horizon* event.

In Alaska, villages specifically requested that the mitigations established to protect whaling are clearly understood by the tribes. Concern was expressed regarding leasing stipulations that establish space-use conflict avoidance and revenue sharing. In the Fairbanks meetings, the main concern was that additional regulations and restrictions in the Chukchi and Beaufort Planning Areas could cripple the Alaskan economy. Many see offshore drilling as a way to sustain the economy, create jobs, and allow their future generations to stay in Alaska. Some noted to refrain from adding additional exclusions and mitigation measures.

3.2.3. Renewable Energy Support

Numerous comments stated support for alternative or renewable energy options. While many were non-specific, some provided supporting materials, literature, and data showing the feasibility, economic value, or environmental benefits of renewable and alternative energies. Some comments provided specific technologies and designs for expanded alternative energy solutions. Other comments explicitly requested that renewable energy be analyzed as a viable alternative in the Programmatic EIS and referenced compliance with NEPA and the OCSLA.

3.3. ENVIRONMENTAL CONCERNS

The following sections provide summaries of environmental concerns expressed by stakeholders regarding biological resources, meteorological conditions, and oil spill-related concerns. Comments about environmental issues were often coupled with socioeconomic-related reasoning and included broad ecosystem-based concerns as well as localized specific concerns.

3.3.1. Biological Resources

Comments received that expressed concern for biological resources included broad ecosystem-wide concerns and specific species or localized concerns. Some comments provided literature regarding biological resource and industry interactions as well as some localized species distribution data. The biological resources category included the following subcategories, which are summarized in the following subsections:

- Biological resources in general;

- Protected species (marine mammals and sea turtles);
- Marine habitats and protected/sensitive areas;
- Fish, fisheries, and Essential Fish Habitat (EFH);
- Birds; and
- Benthic and live bottom resources.

3.3.1.1. Biological Resources in General

Many comments that stated opposition to oil and gas leasing and development expressed concern for environmental issues. For all proposed areas, these comments most often expressed concern for the environment in general, large ecosystems, and wildlife without including more specified information, and were therefore categorized as "biological resources in general." Within biological resources, this was the most commonly cited comment (**Figure 4**).

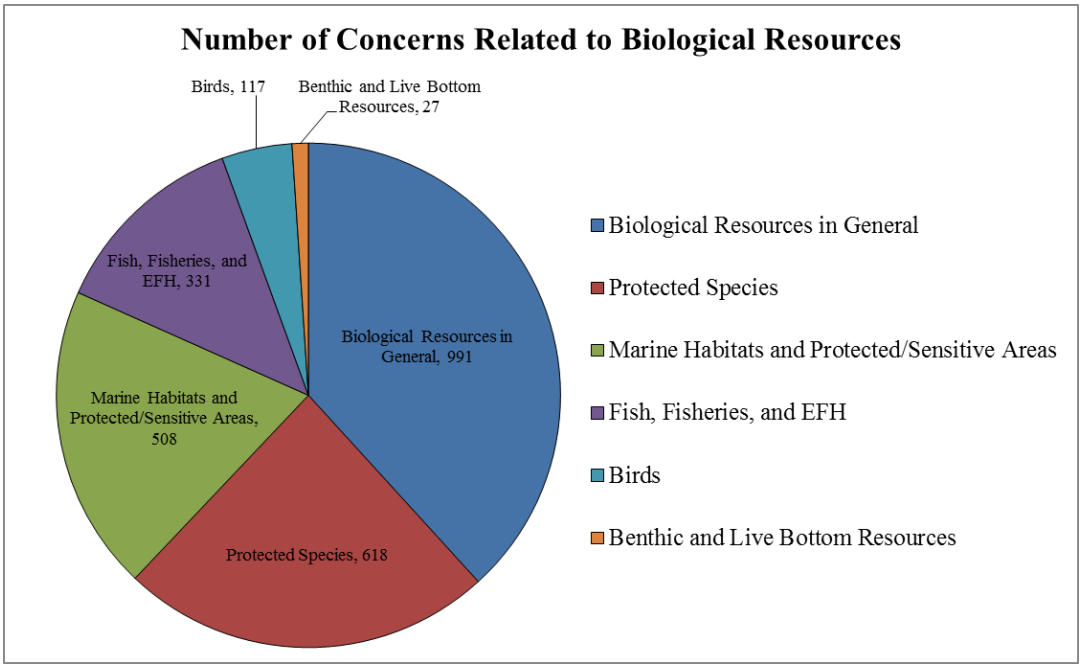

Figure 4. Number of Comments Referencing Concern for Biological Resources.

3.3.1.2. Protected Species

For all Planning Areas, the second-most cited category within biological resources was protected species (**Figure 4**). This category included comments pertaining to protected species in general (including threatened and endangered species), marine mammals, sea turtles, and critical habitats of federally protected species. In each Planning Area, marine mammals were cited the most frequently (often in conjunction with potential impacts from seismic testing).

In the Atlantic Planning Areas, North Atlantic right whales were mentioned very frequently, often with concern for extremely low numbers of individuals in the population, the migration route along the Atlantic coast, and the calving area along the south Atlantic coast. Concern for dolphins and sea turtles (including nesting habitats on beaches) were frequently mentioned for this area as well. In the GOM Planning Areas, Bryde's whales, sperm whales, and dolphins were mentioned, and stakeholders were very concerned about potential impacts to marine mammals from oil spills and dispersants (**Section 3.3.3**). In the Alaska Planning Areas, polar bears, whales (including beluga, bowhead, and gray), seals, and Pacific

walruses were identified as sources of concern. Feeding areas, calving grounds, ice haul-out areas, and migration routes of marine mammals were of high concern in the Alaska Planning Areas.

3.3.1.3. Marine Habitats and Protected/Sensitive Areas

The marine habitats and protected/sensitive coastal habitats categories were combined and together accounted for the third-most common biological comment (**Figure 4**). This category included comments that referenced a type of marine or coastal habitat (e.g., beach, salt marsh, wetland). This category also included comments referencing a particular protected area, such as a National Park, National Seashore, National Marine Sanctuary (NMS), National Wildlife Refuge, Natural Estuarine Research Reserve, Marine Protected Area (MPA), Habitat Area of Particular Concern (HAPC), or critical habitat as designated by the National Marine Fisheries Service.

In the Atlantic Planning Areas, the preservation, health, and value of pristine beaches was mentioned repeatedly, especially in the Outer Banks, North Carolina. Protected areas and marine preserves such as Assateague Island, Cape Hatteras, Cape Lookout, and Cumberland Island National Seashores; Gray's Reef NMS; Norfolk Canyon HAPC and several other MPAs, natural area preserves along barrier islands; and Natural Estuarine Research Reserves were also mentioned in the Atlantic Planning Areas. In the GOM, the Flower Garden Banks NMS was mentioned repeatedly. In Alaska, the Arctic National Wildlife Refuge and Chukchi Corridor were mentioned frequently. The following areas were highlighted specifically as critical to ecosystem health and resilience: Barrow Canyon Complex, Hanna and Herald Shoals, Harrison Bay, and central and eastern U.S. portions of the Beaufort Planning Areas.

3.3.1.4. Fish, Fisheries, and EFH

Concerns over potential impacts to fish, fisheries, and EFH from oil and gas development were fairly common (**Figure 4**). This type of comment usually was cited in conjunction with comments pertaining to commercial and recreational fishing as the health of the fisheries relate to catch totals (**Section 3.4.1.3**). Potential toxicity and devastation of seafood fisheries (e.g., fish, shellfish, mollusks) from oil was commonly mentioned for the Atlantic and GOM Planning Areas related to pelagic and coastal habitats utilized throughout the life cycles of the species. Also, potential impacts from seismic testing on fish, fish eggs, and/or fish larvae were mentioned in several comments.

For the Atlantic and GOM Planning Areas, concerns over potential impacts to seafood fisheries (e.g., shrimp, oysters, and crabs) were stated very frequently, with toxicity to these fisheries or loss of habitat from oil mentioned specifically in several comments (**Section 3.3.3**). Off the mid-Atlantic coast, comments included the following federally managed species (and their respective designated EFH): golden tilefish, butterfish, mackerel, bluefish, flounder, black sea bass, spiny dogfish, monkfish, and skates. Highly migratory species (e.g., marlin, sailfish, swordfish, tuna, dolphin, and wahoo) as well as deepwater species in the snapper/grouper complex were mentioned also. In the GOM Planning Areas, one comment expressed concern for heavy metal toxicity of fishes targeted for human consumption such as snappers due to the presence of oil rigs and offshore drilling chemicals. Overall, very few comments pertaining to this category were received for the GOM Planning Areas. Specific species mentioned for the Alaska Planning Areas included salmon and Arctic cod and areas of EFH for these species as well as lower trophic level food fishes for marine mammals.

3.3.1.5. Birds

Comments expressing concerns for birds were relatively common. Most comments were centered on potential impacts to shorebirds (e.g., pelicans, terns, gulls, skimmers) and pelagic birds (e.g., gannets, shearwaters, petrels, albatrosses) due to direct impacts from oiling and secondary impacts due to destruction of habitats (saltwater marshes and beaches) or ingestion of oil toxins in surface prey from oil spills (**Section 3.3.3**).

In the Atlantic Planning Areas, general concern for shorebirds were mentioned repeatedly, especially for the Outer Banks, North Carolina. Several stakeholders pointed out coastal areas in Georgia as critical habitat for the endangered Wood Stork. Also, the importance of the Atlantic Flyway along the Atlantic coastal barrier islands as a major migratory route for many types of birds was underscored in several comments. In the GOM, impacts to shorebirds and pelagic birds following the *Deepwater Horizon* oil spill were cited repeatedly. In the Alaska Planning Areas, the importance of the Chukchi Corridor for migration of shorebirds and pelagic birds was mentioned by several stakeholders. The Corridor contains globally important hotspots for loons, Pacific Brants, eiders (including Endangered Species Act critical habitat for threatened Stellar's and Spectacled Eiders), murres, gulls, jaegers, and kittiwakes during spring and fall migrations and a network of designated Important Bird Areas. The Beaufort Sea also contains hotspots for some of these same species.

3.3.1.6. Benthic and Live Bottom Resources

Only a few comments expressed concern for potential impacts to benthic and live bottom resources from oil and gas development, overwhelmingly for the Atlantic Planning Areas. Only one comment expressed concern relative to live bottom resources in Alaska and no comments referenced this category for the GOM. Benthic and live bottom resources were categorized as submerged habitats occurring in coastal to pelagic waters containing flora and fauna such as live or soft bottoms. Stakeholders were concerned with direct impacts to benthic resources due to placement of drilling rigs and pipelines as well as indirect impacts due to toxic chemicals and sedimentation from drilling muds and dredging of waterways to accommodate oil tankers and increased vessel traffic. Also, data deficiencies relative to live bottoms and their geographic locations in the Atlantic were cited in several comments.

In the Atlantic Planning Areas, potential impacts to scallop habitat in shallow waters from oil and gas infrastructure or oil spills was cited in several comments. Deepwater canyons and seamounts were noted to be areas of high biodiversity and important feeding areas for marine mammals and were of concern in the Atlantic Planning Areas. Live bottoms containing high numbers of invertebrates such as corals, sponges, sea pens, and sea squirts are widely distributed along the Atlantic OCS. Gray's Reef NMS in the South Atlantic Planning Area is an important live bottom habitat. Some live bottom habitats along the Atlantic OCS contain banks of deepwater black or *Lophelia* corals. In the Alaska Planning Areas, the Hanna Shoal and Barrow Canyon Complex were mentioned as areas with high primary productivity and benthic food resources, and the Barrow Canyon Complex was cited as a migration route for marine mammals and birds.

3.3.2. Meteorological Concerns

The meteorological category contained approximately 350 comments that expressed concern over the leasing program compromising air and water quality or contribute to climate change. Within this category, the comments were divided almost equally between the two topics. The majority of the air and water quality comments expressed concern over pollution of oceanic waters due to an oil spill or dispersants. However, concerns for contamination of estuarine and ground waters also were mentioned in a couple comments as well as increased air pollution from burning of fossil fuels and increased vessel traffic. The majority of air and water quality comments were for the Mid-Atlantic Planning Area (likely as a result of the Planning Area receiving the highest number of comment submissions). However, many comments discussed this topic more globally, inclusive of all Planning Areas. Air quality concerns were raised at a number of the Alaska village meetings along the North Slope.

Comments relating to climate change expressed concern that burning of more fossil fuels as a result of the leasing program may lead to a larger carbon footprint, increased greenhouse gas emissions, sea level rise, and ocean acidification. The majority of climate change concerns were for the Mid-Atlantic Planning Area, although many comments were concerned with climate change throughout all Planning Areas.

3.3.3. Oil Spill Concerns

A large number of comments (1,325 total) expressed concern for oil spills. Approximately 90 percent of these comments included concerns regarding potential severe impacts from oil and dispersants on biological resources, wildlife, commercial fisheries, and tourism-based economies. Related concerns were that these impacts are long-lasting and can persist for decades. Data deficiencies concerning impacts to wildlife from toxins in oil dispersants were mentioned repeatedly, as was a need for better ocean current modeling data to predict spill trajectories (**Section 3.5**). Comments indicated that oil spill trajectory analysis should be conducted.

Many comments noted previous impacts from catastrophic oil spills including the *Exxon-Valdez* and *Deepwater Horizon* events as examples, along with severe opposition to potential future spills of this magnitude. Other concerns expressed within this category were the need for increased safety and regulation of oil and gas development activities and the need for improved oil spill response plans. Comments that supported the leasing program cited greater federal and industry safety regulations following the *Deepwater Horizon* oil spill; however, comments expressing opposition to the leasing program were critical of the implementation of these new regulations. The majority of comments in this category were for the Mid-Atlantic Planning Area (likely as a result of the Planning Area receiving the highest number of comment submissions), followed by comments for the entire Atlantic region, Alaska, and then the GOM.

In the Atlantic Planning Areas, proximity of the Gulf Stream to the proposed OCS drilling areas was a major concern as impacts from a spill could be far-reaching. Many comments were opposed to placement of oil and gas rigs offshore due to prevalence of hurricanes and strong nor'easter storms, which could result in severe damage to infrastructure and cause oil spills. Several comments were concerned with potential impacts to coastal tourism economies as a result of unsightly infrastructure and presence of oil on beaches, especially in the Outer Banks, North Carolina. Potential impacts to marine habitats and wildlife, especially in the salt marshes, estuaries, beaches, and sounds along Atlantic barrier islands, was a repeated concern; often in conjunction with concerns regarding potential impacts to local commercial fishing industries. In the South Atlantic Planning Area, concern for oil and gas development in a region with known natural seismic activity and prevalence of earthquakes was mentioned as a source that could increase the risk of an oil spill.

Comments opposed to expansion of the leasing program in the GOM repeatedly mentioned that negative impacts of the *Deepwater Horizon* oil spill were still occurring and not fully understood. Many comments mentioned toxicity effects on wildlife following the use of Corexit dispersant and general opposition to use of dispersants. Several comments cited examples of toxicity to marine wildlife as a result of dispersants, including higher rates of dolphin mortality and miscarriage, sea turtle mortality, fish lesions, and reproductive impacts to shrimp stocks. Other comments expressed concern for potential impacts to beaches and marine habitats along the Gulf coast of Florida as a result of the Loop Current.

In the Alaska Planning Areas, many concerns stated that spill response would be extremely difficult due to ice cover, with inability to track oil under the ice and impedance of natural degradation of oil from sunlight and air. Many comments discussed that severe weather patterns with heavy storms and strong currents in the Arctic would make cleanup efforts extremely difficult, and that no current technologies currently exist for oil clean up in those weather conditions. Several comments also addressed the lack of infrastructure in the Arctic, thereby further impeding an effective spill response. Numerous comments indicated concern over the 75 percent spill probability stated in the Draft EIS for Chukchi Lease Sale 193. For the Cook Inlet Planning Area, comments noted that wildlife in certain areas were still recovering from the *Exxon-Valdez* oil spill that occurred 25 years ago, and should not be subjected to further risks from future oil spills.

3.4. SOCIOECONOMIC AND CULTURAL CONCERNS

Comments received that expressed concern for socioeconomic and cultural resources included localized specific comments as well as comments focused on a national level. The socioeconomics and cultural resources category included the following subcategories, which are summarized in the following subsections:

- General, non-specific socioeconomic concern;
- Recreation and tourism;
- Commercial and recreational fishing;
- Other marine uses (e.g., military, National Aeronautics and Space Administration [NASA], seafloor cables);
- Coastal communities;
- Subsistence activities; and
- Historical and cultural resources (e.g., coastal historic sites, archaeological sites, and shipwrecks).

Figure 5 provides a summary of the numbers of concerns within each of the subcategories.

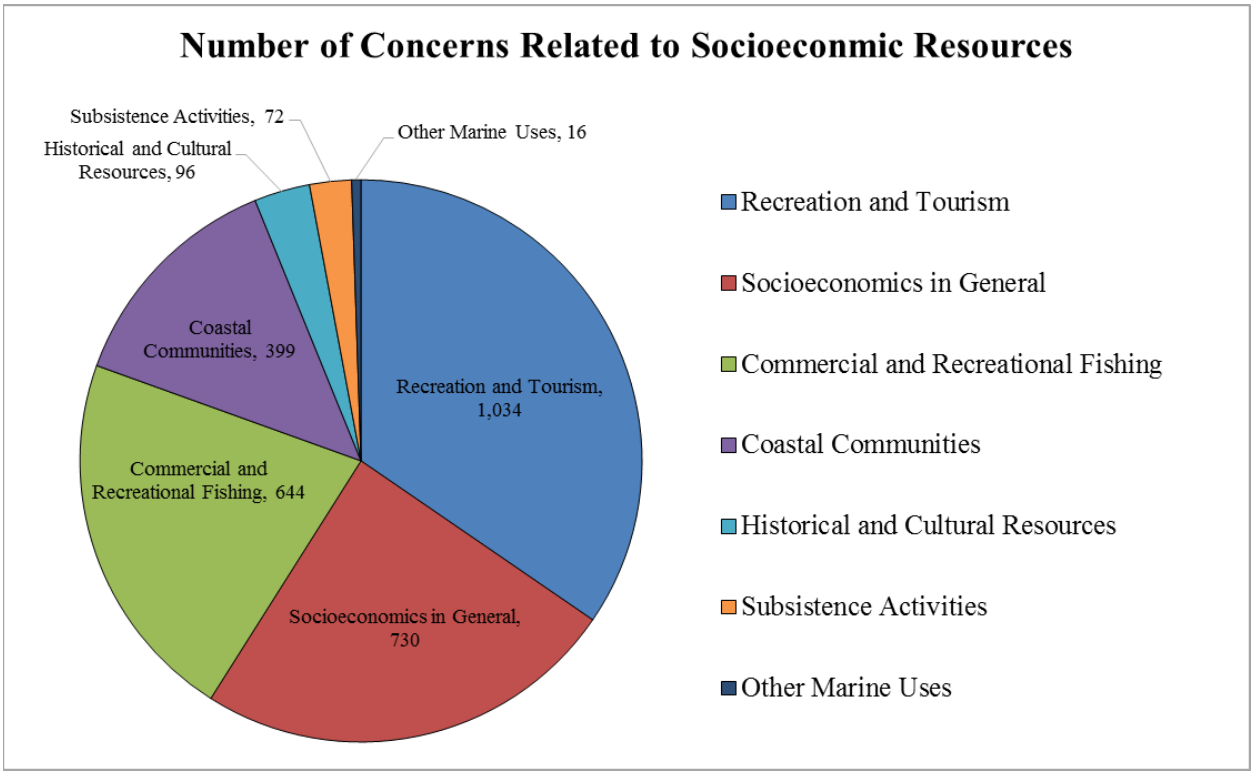

Figure 5. Number of Comments Referencing Concern for Socioeconomic Resources.

3.4.1. Socioeconomic Concerns

3.4.1.1. Socioeconomics in General

Socioeconomics, specifically the impact on general job availability, was a major concern throughout the comments. In all areas, the majority of comments recognized that production and development of the oil and gas industry would allow for the creation of jobs. However, almost all comments pointed out that

although there would be an increase in jobs, the local citizens may not receive any benefits. It was noted that in order to work in the oil and gas industry, specialized training is necessary. Because of this, comments expressed concern that local citizens would not hold the qualifications necessary to work in the oil and gas industry, preventing them from obtaining positions in this field. Furthermore, comments specifically stated that while an increase in oil and gas jobs may be realized, other local professions may see detrimental job loss. **Section 3.4.1.2** provides additional summaries of comments specific to tourism and recreation-based business and revenue reduction.

Another concern, specifically in the Atlantic Planning Areas, was the lack of infrastructure to support production and development in the smaller coastal communities (**Section 3.1**). It was stated that production may be focused in larger localized areas with existing resources such as east coast cities with larger ports. As a result of this possibility, comments showed concern that the smaller local economies would not benefit from generated revenue and profits would not be equally shared throughout the entire Atlantic region.

In the GOM Planning Areas, comments from industry professionals indicated that while the oil and gas industry currently provides one of the largest sources of non-tax revenue to the Federal Government, there could be a decrease in production activities due to the addition of new Planning Areas.

In the Alaska Planning Areas, comments declared the importance of oil and gas production for the economy and to help meet the country's energy needs. In addition to boosting economic growth, comments stated that additional production would help support and extend the longevity of the Trans-Alaska Pipeline System, which has played a critical role in securing the nation's energy supply. Conversely, several comments focused on the Alaska Planning Areas were concerned that further production could have a negative effect on the area's natural resources, which are a major source of income and provide subsistence for many local residents. **Section 3.4.2.2** further discusses subsistence activities in the proposed Planning Areas.

3.4.1.2. Recreation and Tourism

Several comments that stated opposition to oil and gas leasing and development expressed concern regarding tourism and coastal recreation. It was brought up repeatedly that outdoor recreational activities and tourism were the main source of income for coastal communities. Many comments expressed concerned about the negative economic impacts an oil spill would have on coastal communities within the Atlantic Planning Areas. Many coastal communities in this region rely solely on tourism for their economic livelihood and would not survive if tourism was negatively affected by an oil spill. Alternatively, comments in support of the production of oil and gas in these Planning Areas stated that production would have a positive effect on local economies and ultimately attract new businesses and new professionals to the area, which could aid in the increase of recreation and tourism revenue.

In the GOM Planning Areas, comments stressed the importance of oil and gas production for local economies. In contrast, several comments showed concern that increasing production could negatively affect the area's air and water quality, ultimately deterring visitors to the area. **Section 3.3.2** outlines meteorological concerns expressed throughout comment submissions.

A comment pointed out that visitors often frequent parks in Katmai and the Lake Clark areas of Alaska. Visitors typically travel across Cook Inlet to reach the coastal areas of these parks, and there was concern that production in this area could impact the visitor experience. Additionally, parks along the coastline of the Chukchi Sea were created for the protection of subsistence resources. In the event of an oil spill, comments expressed concern that these resources could be threatened. **Section 3.4.2.2** further discusses subsistence activities and resources in the proposed Planning Areas.

3.4.1.3. Commercial and Recreational Fishing

In addition to recreation and tourism, commercial and recreational fishing were mentioned directly and indirectly in many of the comments. In all areas, it was stated that the local restaurants rely heavily on these industries to provide coastal communities with seafood.

In the Atlantic Planning Areas, fishing industries rely directly on the health of the ocean ecosystems and generate billions of dollars in revenue for coastal states (National Marine Fisheries Service, 2014). Comments expressed concern that in the event of an oil spill, the coastal fishing industries would be negatively impacted. Comments indicated concern that oil and gas activities may reduce catch sizes and may further impact overfished species; many referenced the managed areas (e.g., HAPCs, EFH, and MPAs) throughout the Atlantic Planning Areas as well. Furthermore, concerns were raised for the numerous marine fisheries that exist in estuarine habitats along the coast that could be impacted by oil and gas activities.

Comments stated that years after the *Deepwater Horizon* event, the fishing industry in the GOM was still struggling to recuperate. There were major concerns with the quality and quantity of fisheries species following the event of an oil spill. However, one comment pointed out that offshore oil rigs provide a habitat for certain fish such as snapper and grouper. It was emphasized that increased production would create more offshore oil rigs, which in turn would provide additional habitats for commercially valuable species.

Comments claimed that Alaska provides the nation's most productive fishing grounds in addition to providing a higher number of private sector jobs than any other source. Comments in support of exploration in the Arctic regions suggested that it may lead to the discovery of previously unexposed fishery resources. Comments opposed to exploration expressed concern that more development of the oil and gas industry could jeopardize commercial and subsistence fishing activities.

3.4.1.4. Other Marine Uses

A few comments were concerned about existing military and NASA activities as well as submarine telecommunications cables in the Atlantic Planning Areas. It was stated that ongoing military training exercises and operations offshore would be hindered by oil and gas development, and could restrict where military aircraft can operate, forcing them farther out to sea. NASA's Wallops Flight Facility was referenced for interference concerns, indicating that the ongoing research and test flights would be impacted by oil and gas operations. The North American Cable Association expressed concerns that a number of submarine cables traverse the Atlantic Ocean and may be impacted by oil and gas infrastructure and development.

3.4.2. Cultural Concerns

3.4.2.1. Coastal Communities

In the Atlantic Planning Areas, several comments expressed concern regarding the overall health and well-being of coastal communities as a result of oil and gas development. One comment specifically provided information from the Harvard Medical School, stating that oil refineries present major health hazards for humans. Several comments also expressed concern that residents of coastal communities would experience negative changes in their everyday lifestyles. Examples included increased traffic congestion, the smell of oil and gas production and development, and the deterioration of air and water quality. **Section 3.3.2** provides a summary of comments referencing air and water quality concerns.

In the GOM Planning Areas, comments stressed that local communities still are being negatively affected by the *Deepwater Horizon* event. It was stated that beaches and other marine habitats still are harboring tar balls and dispersant residue.

Alaska village participants were concerned about health impacts and food source contamination, referencing health assessments conducted on subsistence resources. The participants understood the economic benefits from oil and gas activities, but were very concerned about the resources harvested to sustain their communities and they expressed concern over their continued way of life.

3.4.2.2. Subsistence Activities

In the Atlantic Planning Areas, the Gullah/Geechee people of the Gullah/Geechee Cultural Heritage Corridor (established by Congress in 2006) provided concern that their way of life would be impacted by oil and gas activities, including fishing, cultural, and spiritual connection to the coastal waters. The Gullah/Geechee Fishing Association was concerned that impacts from oil and gas activities as well as oil spills would affect the fisheries and coastal resources they rely upon as staples of the Gullah/Geechee diet and would be devastating to the community culturally, spiritually, and economically.

Alaska relies heavily on subsistence activities (Alaska Department of Fish and Game, 2012; Booth et al., 2008), and subsistence whaling was a widespread topic throughout comments relating to the Alaska Planning Areas. In the Fairbanks area, comments addressed the possibility of cooperative agreements between the oil and gas industry and the whaling captains during the whaling season to shut down production as a collective effort to support oil and gas production, while also protecting their natural resources. Several comments were concerned that seismic testing could deflect whales from their natural migration routes and therefore negatively affect subsistence whaling in the region.

Hunting reindeer was another subsistence activity mentioned in the comments. It was stated that much of the hunting grounds are covered with pipelines and the Native Alaskan communities would like to see the creation of a refuge as another collective effort to support oil and gas production and development while sustaining their traditional way of life. Another comment stated that Native Alaskans have been using natural oil seeps as a source of fuel for centuries and fear that industrial development could threaten their natural fuel supply.

3.4.2.3. Historical and Cultural Resources

For all Planning Areas, the comments that referenced historical and cultural resources were associated with natural preserves and national coastal historic sites. Coastal historical sites, typically managed by the states, should be coordinated with to obtain local environmental and historical information. In the South Atlantic Planning Area, historical sites in Georgia were specifically listed in a comment letter. The cultural concerns of the Gullah/Geechee people along the Atlantic coast were associated with the spiritual connection the people have with the coastal habitats. Within the Alaska Planning Areas, concerns about historical and cultural resources were associated with the heritage activities of hunting, whaling, and other subsistence activities (**Section 3.4.2.2**). Within the GOM Planning Areas, comments did not reference any historical or cultural resources.

3.5. BASELINE DATA

3.5.1. Data Deficiencies

In the Atlantic Planning Areas, numerous comments stated that an insufficiency in baseline data and extensive ecological data gaps prevented sufficient evaluation of environmental impacts. Additionally, comments mentioned that existing data were not robust enough to identify high risk or ecologically important areas, or to create density estimates for resources within the region. Numerous comments expressed concern that there was a lack of detailed data regarding the Gulf Stream and ocean currents to provide a thorough assessment of potential oil spill trajectories and associated impacts.

An abundance of comments referenced the 1990 scientific panel established by Congress under the Outer Banks Protection Act to identify gaps in data critical to evaluate the potential impacts of oil and gas activities off the North Carolina coast. Comments recommended that the studies advised by that panel be conducted, including oil spill assessment, modeling of currents, socioeconomic analyses, and ecological assessments. Another recommendation was to complete the studies offshore Virginia that were identified in a 2009 workshop conducted by the USDOI's Minerals Management Service (Workshop on Environmental Research Needs in Support of Potential Virginia Offshore Oil and Gas Activities). In

addition, comments suggested that BOEM's Environmental Studies department conduct further studies. No comments specific to data deficiencies were identified in the GOM.

In the Alaska Planning Areas, data gaps were noted in marine mammal density data in northern latitudes. Furthermore, comments stated that fish and pinniped distribution data within the Beaufort and Chukchi Planning Areas were lacking.

3.5.2. Data Source Suggestions

One of the objectives included in the approach for scoping (**Section 2.1.3**) was to obtain useful input and data from stakeholders. Implementation of the GeoPortal allowed stakeholders to view existing baseline data. Data sources, including online portals, literature, and independent studies, were offered and suggested to BOEM for use in the Programmatic EIS development. Robust lists of relevant literature, online geospatial datasets, and even some anecdotal information was provided in the comments. Comments containing data sources were identified and have been reviewed by the project's technical lead to ensure information is scientifically valid and that geospatial data were from an authoritative source and contained appropriate metadata. Relevant information will be distributed to the subject matter experts and authors of the Programmatic EIS. More than 60 comments were identified for review and potential distribution to multiple subject matter experts as well as the geospatial data team.

3.6. REGULATORY COMMENTS

Many comments broadly referenced NEPA compliance, and several specifically referenced NEPA compliance when developing alternatives (**Section 3.2**), evaluating potential environmental impacts (**Section 3.3**), and evaluating potential socioeconomic impacts (**Section 3.4**). Some comments stated that the Programmatic EIS must include a comprehensive review and analysis of potential impacts to the environment and coastal communities from drilling operations and large oil spills. They also stated that the analysis should incorporate a framework to support the assessment of environmental impacts resulting from exploration, development, production, transportation, end use of offshore oil and gas, and decommissioning.

Numerous comments mentioned revenue sharing with the adjacent states; specific to the Atlantic Planning Areas, comments stated that revenue sharing should be increased under the OCSLA commensurate with the Gulf of Mexico Energy Security Act. Conversely, some comments indicated that the economic benefit to their states was not worth the environmental costs and risks. A number of comments strongly encouraged a thorough, quantified risk assessment be conducted to assess the long- and short-term impacts of leasing and development, primarily in the Atlantic and Alaska Planning Areas. It was requested that willingness to pay or cost-benefit assessments be conducted to weigh the economic benefit against the potential environmental impact. Come comments noted that BOEM's current cost models do not take into account the costs of a catastrophic oil spill.

As discussed in **Section 3.1**, a number of comments stated opposition to fossil fuels in general and provided economic information stating that leasing was unnecessary under this Five-Year Oil and Gas Leasing Program because current reserves were at an all-time high with excessive amounts of oil.

Numerous comments from the Atlantic Planning Areas referenced the Outer Banks Protection Act of 1990. Furthermore, comments recommended that all studies outlined in the Environmental Sciences Review Panel established by the Act be conducted before moving forward with oil and gas leasing.

A request to be a cooperating agency on the Central Gulf of Mexico Planning Area was received from the National Park Service, noting that they would like to work towards creating a Memorandum of Understanding outlining the coordination within the Central Gulf of Mexico, specifically, the Gulf Islands National Seashore.

3.7. FORM LETTER AND PETITION STYLE COMMENTS

A total of 377,092 campaign-style form letters or petitions were received from 27 environmental, business, and industry organizations (**Table 4**). The sponsor organization solicited campaign letters or signed petitions, then compiled and submitted them in bulk via mail or electronically through Regulations.gov. These campaign comment letters took the form of a written pledge, voicing opposition to or support of offshore drilling, and typically listed the reasoning for their position. The individual signed letters were not considered as individual comment documents, although the overall form letter was considered as such and considered in the evaluation of scoping comments. All campaign letters were examined for instances where the signee may have added one or more additional concerns. In such cases, those additional comments were included cumulatively during comment evaluation.

Table 4. Summary of Campaign Form Letters and Petitions Received During the Scoping Period.

Organization Name	Stakeholder Type	Number of Letters or Signatures	Summary
Representatives of Businesses	Business	14 signatures	Oppose in Atlantic Planning Areas Environmental, socioeconomic, and oil spill concerns
Seabrook retirement living complex	Business	42 signatures	Oppose in Atlantic Planning Areas (SC) Socioeconomic and oil spill concerns
Alaska Wilderness League	Environmental	15,886 signatures	Oppose in Alaska Planning Areas Wildlife and oil spill concerns (with additional concerns added by 1,250 members)
Center for Biological Diversity	Environmental	22,593 letters	Oppose in Atlantic and Alaska Planning Areas Climate change, oil spill, and wildlife concerns
Chesapeake Climate Action Network	Environmental	54 postcards	Oppose in Atlantic Planning Areas Socioeconomic concerns; support renewable energy
Coastal Conservation League	Environmental	61 signatures	Oppose in Atlantic Planning Areas Socioeconomic and environmental concerns
CREDO Action	Environmental	72,109 letters	Oppose in Atlantic Planning Areas Climate change concerns
Earthjustice	Environmental	45,239 signatures	Oppose in Atlantic and Alaska Planning Areas Oil spills, climate change, emergency response, and biological concerns (with additional concerns added by 4,753 members)
Food & Water Watch	Environmental	20,191 signatures	Oppose in Atlantic and Alaska Planning Areas Environmental, socioeconomic, and oil spill concerns
Friends of the Earth	Environmental	23,341 letters	Oppose all leasing, specifically in Atlantic and Alaska Planning Areas Climate change, oil spill, and economic concerns
League of Conservation Voters*	Environmental	2,305 letters	Oppose in Atlantic Planning Areas Environmental, socioeconomic, and oil spill concerns (with 5,565 names of members)
League of Conservation Voters*	Environmental	2,500 letters	Oppose in Atlantic Planning Areas Socioeconomic concerns
NC League of Conservation Voters*	Environmental	1,101 signatures	Oppose in Atlantic Region Planning Areas (NC) Socioeconomic and oil spill concerns
NC League of Conservation Voters*	Environmental	5 signatures	Oppose in Atlantic Planning Areas (NC) Socioeconomic and oil spill concerns
NC League of Conservation Voters*	Environmental	65 signatures	Oppose in Atlantic Planning Areas Socioeconomic and oil spill concerns
North Carolina Conservation Network*	Environmental	2,186 letters	Oppose in Atlantic Planning Areas (NC) Socioeconomic and oil spill concerns

Table 4. (Continued).

Organization Name	Stakeholder Type	Number of Letters or Signatures	Summary
North Carolina Conservation Network*	Environmental	3,829 letters	Oppose in Atlantic Planning Areas (NC) Socioeconomic and oil spill concerns (3 versions of letter, 81 with additional concerns)
Oceana	Environmental	35 signatures	Oppose in Atlantic and Alaska Planning Areas Wildlife concerns, support renewable energy
Oil Change International*	Environmental	4,196 letters	Oppose in all Planning Areas Climate change concerns
Oil Change International*	Environmental	8,300 letters	Oppose in Alaska Planning Areas Climate change concerns
Sierra Club*	Environmental	294 signatures	Oppose in Atlantic Planning Areas Environmental, socioeconomic, and oil spill concerns, support renewable energy
Sierra Club*	Environmental	2,702 signatures	Oppose in Atlantic and Alaska Planning Areas Climate change, oil spill, and wildlife concerns
Sierra Club*	Environmental	32,315 signatures	Oppose in Atlantic and Alaska Planning Areas Climate change, oil spill, and wildlife concerns
Southern Alliance for Clean Energy	Environmental	372 signatures	Oppose in Atlantic Planning Areas Environmental, socioeconomic, and oil spill concerns, support renewable energy
Consumer Energy Alliance*	Industry	58,512 signatures	Support leasing Streamlined regulations recommendation (4 versions of letters)
Consumer Energy Alliance*	Industry	53,372 signatures	Support leasing No deferrals needed, diversification of energy supplies, domestic energy supply (3 versions of letters)
Total		**377,192**	

* The organization submitted multiple different campaigns.

4. FURTHER PUBLIC INVOLVEMENT

Scoping is the first phase of public involvement under the NEPA process. There will be an additional opportunity for public comment on the Draft 2017-2022 OCS Oil and Gas Leasing Programmatic EIS. A Notice of Availability will be published in the *Federal Register* informing stakeholders and other members of the public that the draft is available for comment. This is anticipated to occur in the first quarter of 2016. The 45-day (minimum duration) comment period will include several public meetings. Comments received on the Draft Programmatic EIS will be considered in preparation of the final document and substantive comments are responded to in the Final Programmatic EIS.

The public will also have an opportunity to review and comment on the Final Programmatic EIS before the Record of Decision is issued.

5. REFERENCES

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National Marine Fisheries Service. 2014. Fisheries Economics of the United States, 2012. U.S. Dept. of Commerce, NOAA Tech. Memo. NMFS-F/SPO-137, 175 pp. Available at: https://www.st.nmfs.noaa.gov/st5/publication/index.html.

APPENDICES

APPENDIX A:

HANDOUTS PROVIDED AT SCOPING MEETINGS


A Step-by-Step Guide to Providing Scoping Comments for the Programmatic EIS
2017-2022 Outer Continental Shelf Oil and Gas Leasing Program
The Bureau of Ocean Energy Management (BOEM) is preparing a Programmatic Environmental Impact Statement (Programmatic EIS) for the 2017-2022 Outer Continental Shelf (OCS) Oil and Gas Leasing Program. As part of its environmental analysis, BOEM is asking all stakeholders to help identify areas or issues of concern for evaluation.
Your local expertise and perspective can help BOEM use all available information in its decision.
1 Learn!
Visit boemoceaninfo.com or attend a public meeting.
2 Understand what input is useful
Help us identify areas or issues of concern for evaluation.
3 Determine how you will provide input
Sending comments via the website is recommended. You can also send them by mail, or provide them at a public meeting.
4 Develop your comments
Write it down, map it out, or send us your data!
5 Submit!
Send your comments through boemoceaninfo.com, or by U.S. mail.
BOEM
Bureau of Ocean Energy Management
boemoceaninfo.com

LEARN: HOW DO I FIND OUT MORE?

Two ways to learn more:

1. VISIT THE PROJECT WEBSITE

Boemoceaninfo.com provides a centralized resource center with background information, details about the proposed action, an interactive GeoPortal, helpful tips for providing comments, answers to frequently asked questions, and more!

2. ATTEND A PUBLIC MEETING

BOEM is hosting 20 public meetings in the proposed action regions along the coast of Alaska, the Gulf of Mexico, and the Mid- and South Atlantic. Scoping meetings will be an open house format to facilitate one-on-one conversations and to provide information. To find a meeting near you, please visit boemoceaninfo.com/get-involved/meetings.

DETERMINE HOW YOU WILL PROVIDE INPUT

PROJECT WEBSITE

To facilitate immediate receipt of your comments, we encourage comment submissions through boemoceaninfo.com.

BOEM has taken steps to make this an easy and efficient way of submitting comments.

HARD COPY

Write a letter or fill out a comment form that can be submitted via mail or at a public meeting.

Send us your large file data sets via DVD-ROM.

RESOURCES TO CONSIDER

When formulating your scoping comment for the Programmatic EIS for the 2017-2022 Outer Continental Shelf Oil and Gas Leasing Program

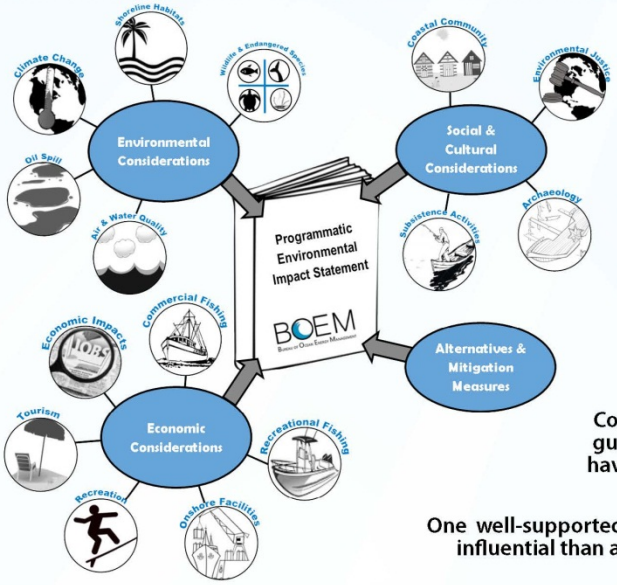
Your input provides a clearer, more focused approach and helps determine what is important to investigate, so when crafting a comment, it is important that you follow these guidelines.

QUESTIONS TO CONSIDER WHEN FORMULATING YOUR COMMENT:

Are there any alternative options BOEM has not thought of?

Would you propose mitigation measures to reduce or eliminate impacts?

Do you have any resources, literature, GIS data/maps, or other data that may be overlooked or are not publically available?



USEFUL COMMENTS ARE:

- Information-rich, specific, and geographically-focused.
- Clearly communicated, concise, and supported by scientific evidence or sound reasoning.
- Descriptive of how you or the environment will be affected.

Comments that follow these guidelines are more likely to have an impact on regulatory decision making.

One well-supported comment is often more influential than a thousand form letters.

DEVELOP YOUR COMMENTS

TEXT

Share your comments via the project website at boemoceaninfo.com. Alternatively, you can hand write your comments on a comment form that you can download from the project website and submit via mail. At the public meetings, computers and comment forms will be available for your use.

GEOSPATIAL

Use the GeoPortal, a browser-based, secure web application through which users can view, interact with, and analyze geospatial information. In the GeoPortal you can draw on maps to show the locations of potential impacts, filter and bookmark regions, measure distance and location, and more! Then, download your map and submit it as part of your comments via the website or hardcopy.

DATA SETS

If you have other data or information you think BOEM should consider, share it with us! Minimum data requirements can be found at boemoceaninfo.com/geoportal.

SUBMIT!

HOW DO I SUBMIT COMMENTS ONLINE?

Follow the simple directions at boemoceaninfo.com. If you have data sets you would like to submit, you can do so via www.regulations.gov. For file sizes larger than 10 MB, please save to DVD-ROM and mail or bring to a public meeting.

HOW DO I SUBMIT HARD COPY COMMENTS?

Please submit your hard copy comments via U.S. mail in envelopes labeled "Scoping Comments for the 2017-2022 Proposed Oil and Gas Leasing Program PEIS" and mail to:

Mr. Geoffrey L. Wikel, Acting Chief
Division of Environmental Assessment
Office of Environmental Programs (HM 3107)
Bureau of Ocean Energy Management
381 Elden St., Herndon, VA 20170

BOEM
Bureau of Ocean Energy Management

Programmatic Environmental Impact Statement for the 2017-2022 Outer Continental Shelf Oil and Gas Leasing Program

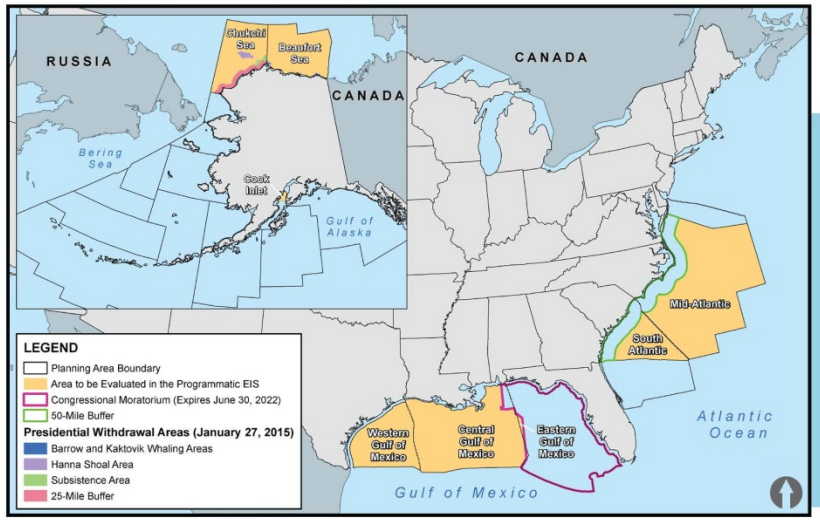
What should we consider?

What should we investigate?

Your input is an important part of this process in order to ensure the most focused analysis possible.

Scoping is an important part of the process of developing a Programmatic Environmental Impact Statement (Programmatic EIS) through which a federal agency describes a proposed action and possible alternatives and analyzes potential environmental impacts. The Programmatic EIS does not analyze whether the proposed action should occur, but rather what environmental impacts may occur from the proposed action.

The Bureau of Ocean Energy Management (BOEM) is proposing the potential sale of leases for oil and gas exploration and development along the Outer Continental Shelf (OCS) as shown in the 2017-2022 Draft Proposed Program, available at boem.gov/Five-Year-Program-2017-2022/.



GET INVOLVED *send us your comments.*

VISIT US ONLINE OR COMMENT BY MAIL

boemoceaninfo.com

Envelopes should be labeled

"Scoping Comments for the 2017-2022 Proposed Oil and Gas Leasing Program PEIS"

and mailed to:

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GET INVOLVED *attend a meeting.*

TO FIND A MEETING NEAR YOU, VISIT boemoceaninfo.com/get-involved/meetings/

WHAT IS BEING PROPOSED?

BOEM has identified eight OCS Planning Areas for possible inclusion in the 2017-2022 Outer Continental Shelf Oil and Gas Leasing Program. These Draft Proposed Program Areas (see map) include:

- **Alaska** – including portions of the Beaufort Sea, Chukchi Sea, and Cook Inlet planning areas
- **Atlantic** – including portions of the Mid- and South Atlantic planning areas
- **Gulf of Mexico (GOM)** – including the Central and Western GOM Planning Areas, and a small portion of the Eastern GOM Planning Area

BOEM proposes as many as 14 lease sales distributed among the planning areas between 2017-2022.

BOEM: Programmatic EIS for the 2017-2022 OCS Oil & Gas Leasing Program

OUR VISION FOR THE SCOPING PROCESS

"To encourage robust public engagement to inform BOEM's NEPA scoping for the Programmatic EIS for the 2017-2022 Oil and Gas Leasing Program."

OVERVIEW

BOEM promotes energy independence, environmental protection, and economic development through responsible, science-based management of offshore conventional and renewable energy and marine mineral resources. BOEM is responsible for resource management, including leasing, economic analysis, resource evaluation, and environmental analysis.

BOEM is engaging a wide range of stakeholders to gather as much input as possible for consideration of potential new leases in Alaska, the Gulf of Mexico, and the Mid- and South Atlantic.

THE PROCESS

The Outer Continental Shelf Lands Act (OCSLA) established that the Secretary of the Interior must prepare an oil and gas leasing program every five years, showing the size, timing, and location of potential leasing activity as precisely as possible. The process begins with a Request for Information and culminates with a final program, with drafts and comment periods in between.

Because oil and gas exploration on the OCS may impact the environment, economy, and numerous stakeholders, the OCSLA process initiates a concurrent environmental review as required by the National Environmental Policy Act (NEPA). This analysis of potential environmental effects is called a Programmatic EIS.

BY THE NUMBERS

1.7 BILLION Acres of OCS lands managed by BOEM that surround the coasts of the U.S.

6,136 Active leases in the OCS; almost 70% of these are in the Gulf of Mexico (as of November 2014).

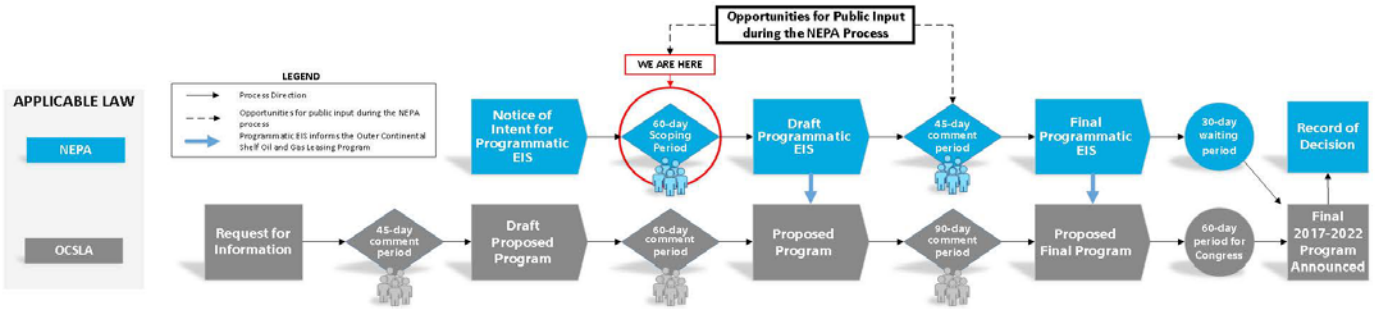
36 MILLION Acres of OCS currently under lease that produce 5% and 18% of U.S. domestic natural gas and oil, respectively.

700 THOUSAND Domestic jobs supported by oil and gas leasing.

In order to develop a Programmatic EIS that reflects the best available science, technology, research, and data available, BOEM conducts a public scoping process to solicit input from any and all stakeholders and communities that may be affected, positively or negatively, by OCS oil and gas leasing

Your participation provides a clearer, more comprehensive picture of the potential impacts of lease sales on the OCS and helps to determine what is most important to investigate in the development of the Programmatic EIS.

The 2017-2022 OCS Oil and Gas Leasing Program will move forward once the Secretary of the Interior has taken into account the analyses from the Programmatic EIS and issued a decision on the Proposed Final Program.




Frequently Asked Questions
Programmatic Environmental Impact Statement for the
2017 -2022 Outer Continental Shelf Oil and Gas Leasing Program
1
What is the Outer Continental Shelf (OCS)?
Submerged lands seaward of state waters (see map).
The OCS consists of all submerged lands (the seafloor) lying seaward of State waters. OCS waters are federal waters and begin 3 nautical miles off the coast (except for Texas and the Gulf coast of Florida, where state waters go out approximately 9 nautical miles) and extend to 200 nautical miles from the coastline or where they meet another country's waters closer than 200 nautical miles.
The Bureau of Ocean Energy Management (BOEM) manages 1.7 billion acres of submerged lands on the OCS, which is more than 2/3 of the total land area of the United States!
2
What is the Outer Continental Shelf Lands Act?
The Outer Continental Shelf Lands Act, or OCSLA, was passed in 1953 and authorizes the Secretary of Interior to lease portions of the OCS for oil and gas development. The OCSLA authorizes the Federal Government, through BOEM, to grant leases for the exploration, development, and production of oil and gas from the OCS. The OCSLA dictates that the first step is to prepare and maintain a schedule of proposed lease sales determined to "best meet national energy needs for the five-year period following its approval or reapproval." The Secretary of Interior and BOEM are embarking on the preparation of the 2017-2022 Outer Continental Shelf Oil and Gas Leasing Program.
3
What is a Lease Sale?
A lease sale is the process by which BOEM transfers the right to apply for authorization to explore and develop the mineral resources within the leased area. Before authorizing any activities, BOEM carefully reviews all requests under the National Environmental Policy Act and numerous other environmental laws to ensure that the activities will be conducted in a safe and environmentally sound manner and that the interests of key stakeholders are effectively addressed.
4
What is NEPA?
NEPA, the National Environmental Policy Act, was passed in 1970 and requires federal agencies to consider environmental impacts when they propose an action. NEPA also directs federal agencies to consider alternatives to their proposed action. For the Oil and Gas Leasing Program, BOEM first prepares a Programmatic Environmental Impact Statement (Programmatic EIS) to comply with NEPA. BOEM prepares subsequent NEPA documents before an area is leased, including regional leasing and lease-specific analyses.
5
How does NEPA integrate with the OCSLA process?
The OCSLA gives the Federal Government, through BOEM, the right to issue leases (see #2 and #3). NEPA requires federal agencies (such as BOEM) to consider environmental impacts and alternatives for a proposed action (see #4). When BOEM goes through the process of deciding what areas should be offered for lease, we look at the environmental impacts of leasing in those areas and what we could do instead of leasing in those areas.
The action BOEM takes under the OCSLA triggers the NEPA process.
BOEM
Bureau of Ocean Energy Management
boemoceaninfo.com


Frequently Asked Questions
Programmatic Environmental Impact Statement for the
2017 -2022 Outer Continental Shelf Oil and Gas Leasing Program
6
What is a Programmatic EIS?
Once the NEPA process is initiated, BOEM begins to prepare a Programmatic EIS, which is a document that analyzes the potential environmental impacts of an action with a broad geographic scope, such as oil and gas leasing in OCS waters. BOEM uses the Programmatic EIS to determine what the most important issues are when it comes to oil and gas leasing; how we can effectively avoid or manage environmental impacts; and what other options, or alternatives, for the proposed action are available. BOEM begins to determine what the issues and impacts are through a process under NEPA called "scoping."
7
What is scoping?
All of the issues BOEM should consider.
The "scope" of the Programmatic EIS includes all of the issues that BOEM should consider when it is analyzing effects of the Oil and Gas Leasing Program in accordance with NEPA. It also includes the other options – or "alternatives" – BOEM should look at in addition to what is being proposed. BOEM uses past environmental documents we have prepared and, most importantly, we ask the public what you think. The most important things are "significant" impacts - that is, what places, habitats, species, or uses are the most likely to be affected? BOEM needs you to tell us what and where is most important to you when it comes to oil and gas development on the OCS.
8
What is the Draft Proposed Program?
The second stage of a five-stage process to develop the 2017-2022 Oil and Gas Leasing Program.
The OCSLA requires BOEM to propose a schedule of lease sales every five years (see #2). This is referred to as the "Oil and Gas Leasing Program" and is the action that triggers NEPA (see #5). Preparation and approval of an Oil and Gas Leasing Program is based on the Secretary of the Interior's balancing of factors specified by Section 18 of the OCSLA to determine the size, timing, and location of lease sales. The Draft Proposed Program decision document lays out a proposed schedule of potential lease sales and is the first of three proposals to be issued for public review before a new Oil and Gas Leasing Program may be approved. The Draft Programmatic EIS is based on the Draft Proposed Program and analyzes the potential environmental impacts of the draft proposed program.
9
What if I think oil and gas leasing is just a bad idea?
What if I think it's a great idea?
Your opinion is important and we encourage you to make your voice heard. This process is focused on the environmental impact of the program – not whether or not there should be oil and gas leasing. There are other opportunities to participate in the process of developing BOEM's 2017-2022 Outer Continental Shelf Oil and Gas Leasing Program.
Learn more about the leasing program and how you can provide input at www.boem.gov.
10
Why should I participate?
The decisions that BOEM makes regarding where and when to lease areas of the OCS are based in part on the analysis we do in the Programmatic EIS. If BOEM does not know where you work and play on the ocean, we cannot consider that in our analysis.
Scoping (see #7) is an early and open process that provides an opportunity for you, the public, to provide useful input at the beginning of the Programmatic EIS process.
Your input ensures that BOEM is focusing our analysis on the important issues and areas.
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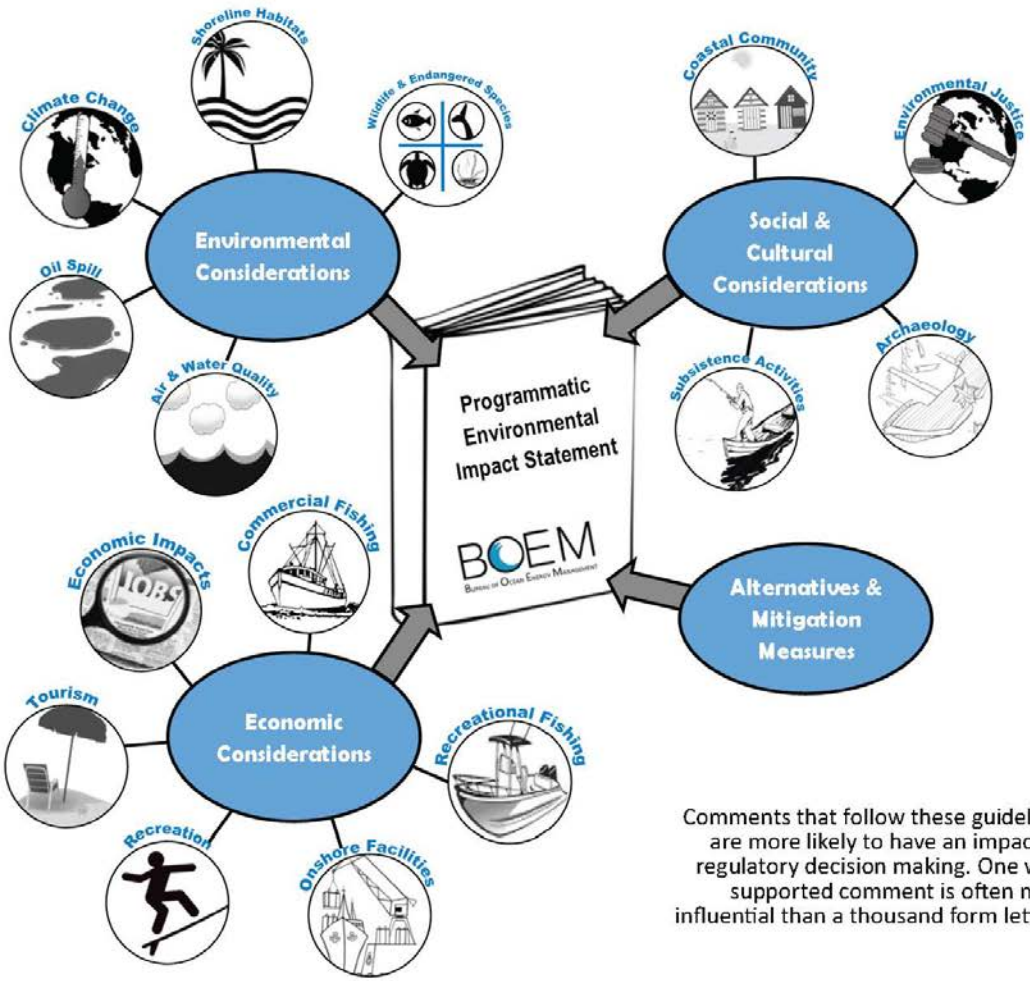
boemoceaninfo.com

RESOURCES TO CONSIDER

When formulating your scoping comment for the Programmatic EIS for the 2017-2022 Outer Continental Shelf Oil & Gas Leasing Program.

BOEM
Bureau of Ocean Energy Management



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Your input provides a clearer, more focused approach and helps determine what is important to investigate, so when crafting a comment it is important that you follow these guidelines.

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- Information-rich, specific, and geographically-focused.
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QUESTIONS TO CONSIDER WHEN FORMULATING YOUR COMMENT:

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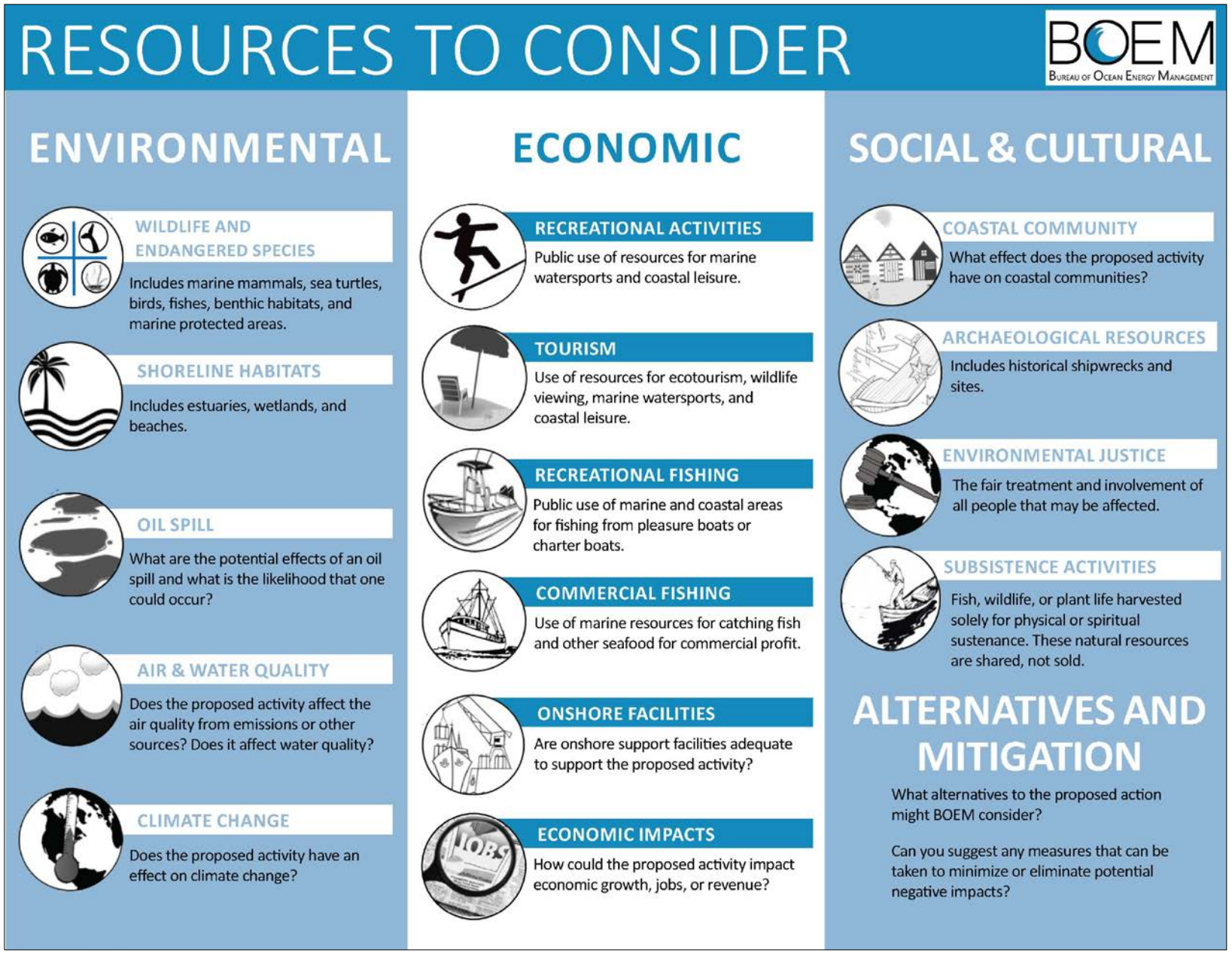

RESOURCES TO CONSIDER
BOEM
Bureau of Ocean Energy Management
ENVIRONMENTAL
WILDLIFE AND ENDANGERED SPECIES
Includes marine mammals, sea turtles, birds, fishes, benthic habitats, and marine protected areas.
SHORELINE HABITATS
Includes estuaries, wetlands, and beaches.
OIL SPILL
What are the potential effects of an oil spill and what is the likelihood that one could occur?
AIR & WATER QUALITY
Does the proposed activity affect the air quality from emissions or other sources? Does it affect water quality?
CLIMATE CHANGE
Does the proposed activity have an effect on climate change?
ECONOMIC
RECREATIONAL ACTIVITIES
Public use of resources for marine watersports and coastal leisure.
TOURISM
Use of resources for ecotourism, wildlife viewing, marine watersports, and coastal leisure.
RECREATIONAL FISHING
Public use of marine and coastal areas for fishing from pleasure boats or charter boats.
COMMERCIAL FISHING
Use of marine resources for catching fish and other seafood for commercial profit.
ONSHORE FACILITIES
Are onshore support facilities adequate to support the proposed activity?
ECONOMIC IMPACTS
How could the proposed activity impact economic growth, jobs, or revenue?
SOCIAL & CULTURAL
COASTAL COMMUNITY
What effect does the proposed activity have on coastal communities?
ARCHAEOLOGICAL RESOURCES
Includes historical shipwrecks and sites.
ENVIRONMENTAL JUSTICE
The fair treatment and involvement of all people that may be affected.
SUBSISTENCE ACTIVITIES
Fish, wildlife, or plant life harvested solely for physical or spiritual sustenance. These natural resources are shared, not sold.
ALTERNATIVES AND MITIGATION
What alternatives to the proposed action might BOEM consider?
Can you suggest any measures that can be taken to minimize or eliminate potential negative impacts?

APPENDIX B:

WEBSITE ANALYTICS REPORT FOR WWW.BOEMOCEANINFO.COM

Kearns & West *May 6, 2015*

Bureau of Ocean Energy Management
Programmatic EIS for the 2017-2022 OCS Oil and Gas Leasing Program

Website Analytics Report
http://boemoceaninfo.com/
Reporting Timeframe: January 28, 2015 – March 30, 2015

Analysis, Insights, and Opportunities

- Excellent Baseline: The first eight weeks of website traffic during the scoping period represent a great foundation for future analysis. Visitors from all 50 states have accessed the website. Instances of high visitor traffic correlate with OCS meetings dates. This report will serve as a baseline for other phases in this effort.
- Peak Traffic: Visitor traffic has peaked four times. We identified peaks bade on sharp inclines and relative high-traffic days throughout this period.
    - The first peak included 392 visitor sessions on January 28, 2015 – the website launch date.
    - The second peak included 433 visitor sessions on February 9, 2015 – coinciding with the first two public meetings. Deeper analysis confirms this, with the top geolocation being DC, the location of one of the meetings.
    - The third peak included 320 visitor sessions on February 17, 2015 – coinciding with public meetings in Barrow, AK and Wilmington, NC. Deeper analysis supports this, with the top geolocation being Wilmington.
    - The fourth peak included 363 visitor sessions on March 30, 2015 – coinciding with the last day of the scoping comment period.
- Social Presences: The website receives traffic from 6 social websites, two of which have active BOEM presences.
    - *Facebook / Twitter* – Reinforce positive trends. Maintain current approach, continue driving web traffic.
    - *Reddit* – Traffic was mostly on February 11, with 12 sessions. No action recommended, consider monitoring reddit if traffic continues.
    - *LinkedIn* – BOEM has a LinkedIn group with minimal activity. Recommend assessing LinkedIn traffic origins, and considering posting information on the Bureau of Ocean Energy Management LinkedIn group.
- Content: 79% of visitor's click on the home page's carousel images.
    - Recommend using carousel images to funnel visitor traffic to content that best aligns with BOEM's interests and website objectives. Additionally, these access points can be used to highlight content that BOEM would like to receive increased traffic.
    - Specific content decisions for the carousel should consider overall content value, content deemed high-value that does not meet expectations for traffic, and visitor content preferences.
- Access Type: 76% of users accessed the site through a desktop, 17% used a mobile device and 7% used a tablet.

BOEMoceaninfo com - Scoping Period Analytics Report (05.06.15) Page **1** of **8**

- No action recommended, this data supports BOEM's use of mobile optimization.

- Search: search terms include keywords that are substantively aligned with BOEM's stakeholder groups
  - Recommend continuing to monitor search terms
  - Recommend adjustments to website Search Engine Optimization tactics to match future project phases
- Inflated Traffic Statistics: There appears to be some minor traffic source inflation from BOEM staff and Project Team members.
  - Further analysis can exclude BOEM and Project Team IP addresses to avoid boosting stats with traffic from internal staff, however important internal audiences could be excluded from statistics. There is also value in capturing and analyzing internal web traffic patterns.
  - No action recommended now. Continue monitoring this issue to determine if inflated statistics impact overall trend analysis.

Kearns & West *May 6, 2015*

Website Statistics

Audience Overview

Visits: 10,847

Unique Visitors: 7,478

Percent New Visits: 68.55%

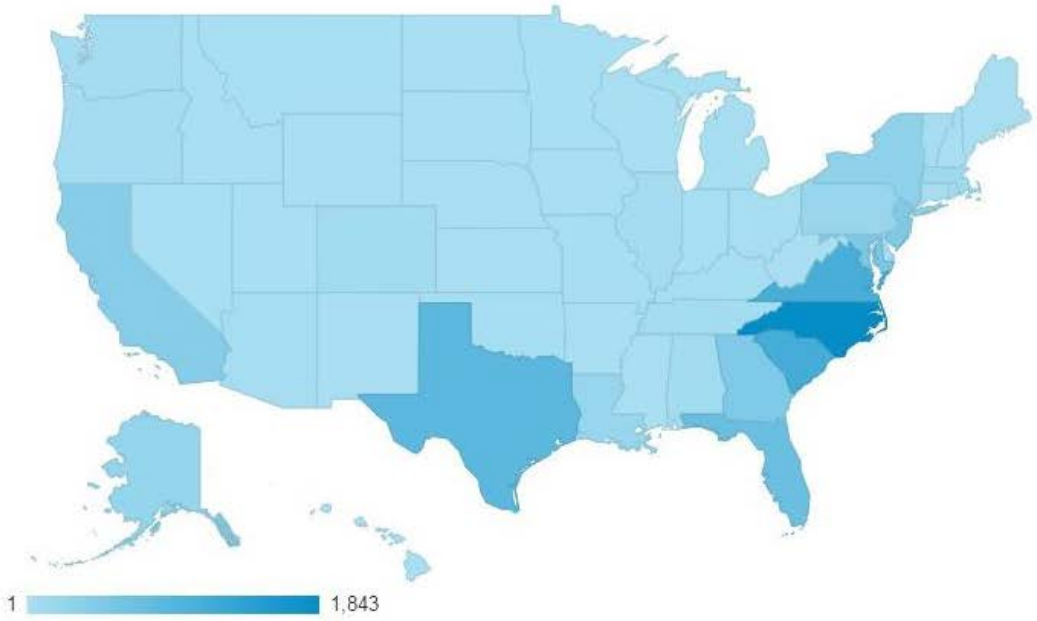
Average Visit Duration: 00:01:48

Languages[1]: English (97.30%), French (0.22%), Spanish (0.15%)

Locations

Visitors from all 50 states have visited the BOEMoceaninfo website.

Figure 1: National Traffic Map



[1] This report includes the top 10 language codes used to access the site.

BOEMoceaninfo com - Scoping Period Analytics Report (05.06.15) Page **3** of **8**

All National States[23]:

State specific traffic maps are available upon request

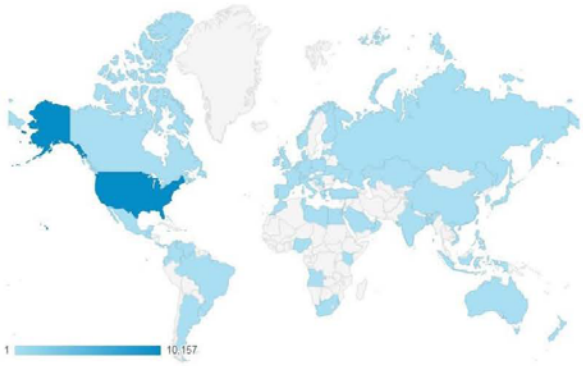
North Carolina	1,843	18.15%		Ohio	31	0.31%
South Carolina	1,133	11.15%		Kentucky	29	0.29%
Virginia	1,079	10.62%		Missouri	28	0.28%
Texas	875	8.61%		Oklahoma	20	0.20%
District of Columbia	729	7.18%		Vermont	18	0.18%
Florida	707	6.96%		Wisconsin	17	0.17%
Maryland	507	4.99%		Nebraska	15	0.15%
Georgia	480	4.73%		New Hampshire	15	0.15%
New Jersey	470	4.63%		New Mexico	15	0.15%
California	396	3.90%		Hawaii	14	0.14%
New York	290	2.86%		Kansas	14	0.14%
Alaska	233	2.29%		Maine	14	0.14%
Louisiana	206	2.03%		Mississippi	13	0.13%
Pennsylvania	192	1.89%		Minnesota	12	0.12%
Massachusetts	111	1.09%		Indiana	11	0.11%
Alabama	80	0.79%		Montana	8	0.08%
Colorado	77	0.76%		Nevada	7	0.07%
Tennessee	64	0.63%		Arkansas	5	0.05%
Illinois	59	0.58%		West Virginia	5	0.05%
Oregon	58	0.57%		Idaho	4	0.04%
Washington	58	0.57%		Wyoming	2	0.02%
Arizona	35	0.34%		Iowa	1	0.01%
Connecticut	33	0.32%		North Dakota	1	0.01%
Rhode Island	32	0.32%		South Dakota	1	0.01%
Delaware	31	0.31%		Utah	1	0.01%
Michigan	31	0.31%				

[2] Visitors who have opted not to share use statistics have been excluded from this list, typically characterized as "not set"

[3] Green highlight indicates top 10

Top 10 International Locations[4]**:**

1. United States – 10,157
2. United Kingdom – 136
3. Canada – 93
4. Germany – 41
5. Russia – 37
6. Ukraine – 33
7. Argentina – 28
8. France – 28
9. Australia – 17
10. Israel - 16



Traffic

Percentage of Direct Visits (e.g., visits from links in emails or typing the URL into a web browser): 41.30%
Percentage of Referral Visits (e.g., visits from another website that links to the website): 39.01%
Percentage of Social Visits (e.g., visits from a social media side like Facebook): 12.71%
Percentage of Organic Search Visits (e.g., visits from Google search results): 3.49%
Percentage of Email Visits: 2.97%

Top 5 Overall Traffic Sources (ways that visitors reach the site):
Direct Traffic – 4,480 Visits
Boem.gov – 1,859 Visits
Facebook (All) – 1,178 Visits
Surfrider.org – 553 Visits
Twitter – 166 Visits

[4] Visitors who have opted not to share use statistics have been excluded from this list, typically characterized as "not set"

Top 20 Referral Traffic Sources[5]:
Boem.gov – 1,859 Visits
Facebook – 1,178 Visits
Surfrider.org – 553 Visits
Twitter – 166 Visits
Twitter - 113 Visits
Postandcourier.com – 98 Visits
Easternsurf.com – 92 Visits
Coastalconservationleague.org – 79 Visits
Nola.com – 71 Visits
takeaction.consumerenergyalliance.org – 67 Visits
e360.yale.edu – 58 Visits
actforbays.org – 55 Visits
al.com – 45 Visits
simple-share-buttons.com – 43 Visits
surfermag.com – 43 Visits
enews.oceannews.com – 42 Visits
pressofatlanticcity.com – 42 Visits
nj.com – 35 Visits
swellinfo.com – 34 Visits
ranksonic.info – 33 Visits
switchboard.nrdc.org – 32 Visits

Top 5 Search Terms[6]:
"boem ocean info"
"boem meeting atlantic city 2015"
"boem map oil gas energy"
"savannah ga offshore drilling meeting march 24 2015"
"boem"

[5] Unclear / extraneous referrals have been removed from this list.

[6] Visitors that have opted not to share web statistics information, and organic search terms that are copy/paste links have been excluded from this report. In this case, nearly 300 users reached the site using undisclosed search teams.

Social Media

Total Visits via Social Network Referrals (e.g., links from Facebook posts or LinkedIn groups):

Facebook – 1,178 Visits

Twitter – 166 Visits

Reddit – 15 Visits

LinkedIn – 9 Visits

StumbleUpon – 9 Visits

Paper.li – 1 Visit

Access Type

Desktop – 8,256 Visits

Mobile – 1,850 Visits

Tablet – 741 Visits

Content

Total Page Views: 38,492

Top 5 Pages:

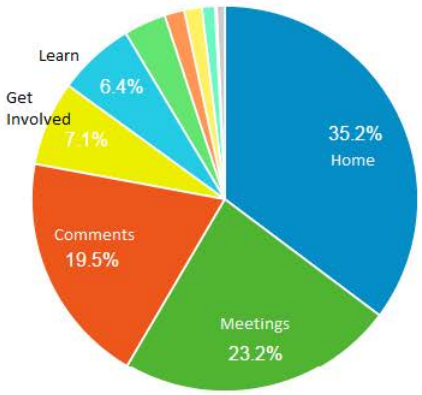
Home – 13,565 pageviews

Meetings – 8,931 pageviews

Comments – 7,497 pageviews

Get Involved – 2,718 pageviews

Learn – 2,477 pageviews



First Click from the Home Page[7]

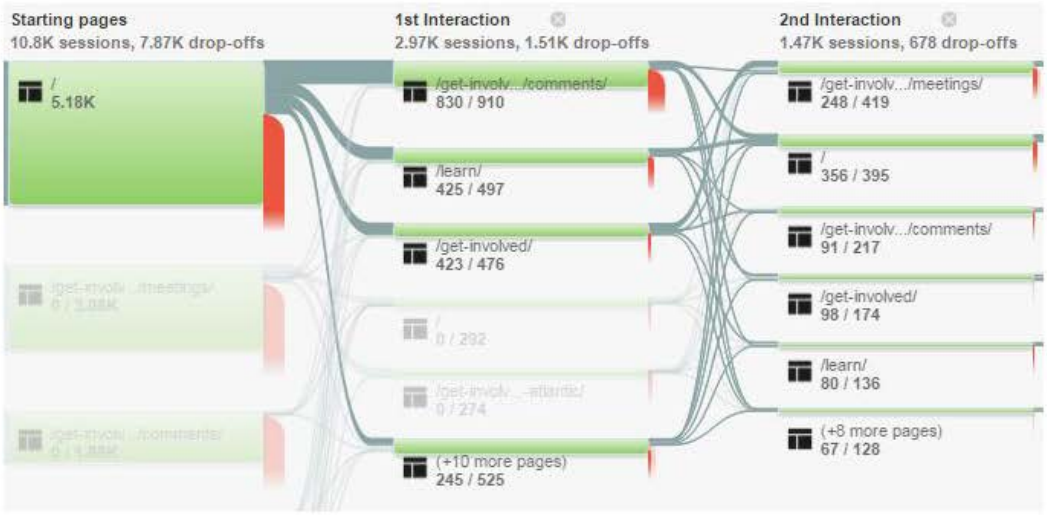
Comments – 910 first clicks

Learn – 497 first clicks

Get Involved – 476 first clicks

Meetings – 241 first clicks

Contact Us – 111 first clicks



[7] First click includes the users' first interaction with the website once they have already reached the site.

APPENDIX C:

LIST OF STAKEHOLDER GROUPS THAT PROVIDED COMMENTS

Organization Name	Organization Type
Duke University	Academia
Duke University Geospatial Ecology Lab	Academia
Fisheries Survival Fund	Academia
Georgia Aquarium	Academia
Sabin Center for Climate Change Law	Academia
Virginia Institute of Marine Science	Academia
Back Country Tours	Business
Bald Head Association/BHI Stage II Association	Business
black pelican seafood co inc	Business
Blue Ridge Outdoors	Business
Conservation Cooperative of Gulf Fishermen	Business
Corolla parasail	Business
East Islands Real Estate	Business
Georgia Agribusiness Council	Business
Jacksonville Axemen Rugby League	Business
Jersey Coast Anglers Association/Jersey State Federation of Sportsman Clubs	Business
Kitty Hawk Kayaks & Surf School	Business
McNamaras Heating and Cooling	Business
National Association of Charterboat Operators	Business
New Mexico Business Coalition	Business
Outer Banks Association of Realtors	Business
Palmetto AgriBusiness Council	Business
Panama City Boatmen Association	Business
South Island Real Estate	Business
Surfs up Seafood	Business
Surfside Seafood, LLC	Business
The Virginia Beach Restaurant Association	Business
United national fishermens Assoc	Business
Virginia Beach Restaurant Association	Business
Gullah/Geechee Fishing Association	Cultural
Gullah/Geechee Sea Island Coalition	Cultural
GullahGeecheeangelnetwork	Cultural
Kenaitze Indian Tribe	Cultural
Alaska Libertarian Party	Environmental NGO
Alaska Wilderness League	Environmental NGO
Altamaha Riverkeeper	Environmental NGO
American Littoral Society	Environmental NGO
Assateague Coastal Trust	Environmental NGO
Audobon, Oceana, Ocean Conservancy, PEW, WWF	Environmental NGO
Audubon AK, Oceana, Ocean Conservancy, The Pew Charitable Trusts, WWF	Environmental NGO
Audubon North Carolina	Environmental NGO
Bald Head Island Conservancy	Environmental NGO
Center for a Sustainable Coast	Environmental NGO
Center for Biological Diversity	Environmental NGO
Clean Water for NC	Environmental NGO
Friends of Hunting Island State Park, Inc.	Environmental NGO
Georgia Climate Change Coalition	Environmental NGO
LegaSea OBX	Environmental NGO
Marine Conservation Institute	Environmental NGO
Matanzas Riverkeeper/Friends of Matanzas	Environmental NGO
Natural Resources Defense Council	Environmental NGO
New Progressive Alliance	Environmental NGO
NO to Off Shore Oil Drilling in North Carolina's waters!	Environmental NGO
North Carolina Coastal Federation	Environmental NGO
NotTheAnswerNC	Environmental NGO
NY4Whales	Environmental NGO
Ocean Consearvation Research	Environmental NGO
Ocean Conservation Research	Environmental NGO

Organization Name	Organization Type
Oceana, Inc.	Environmental NGO
Ogeechee Audubon Society	Environmental NGO
One Hundered Miles	Environmental NGO
One Hundred Miles, Inc.	Environmental NGO
Our Children's Trust	Environmental NGO
Outer Banks Center for Dolphin Research	Environmental NGO
Outer Banks Surfrider Chapter	Environmental NGO
Sandy Hook Sealife Foundation	Environmental NGO
SandyHook SeaLife Foundation (SSF)	Environmental NGO
Save Our Rivers, Inc.	Environmental NGO
Sierra Club	Environmental NGO
SIERRA CLUB OCEAN COUNTY	Environmental NGO
South Carolina Wildlife Federation	Environmental NGO
Southern Enviromental Law Center	Environmental NGO
Southern Environmental Law Center	Environmental NGO
St. Marys EarthKeepers	Environmental NGO
Surfrider	Environmental NGO
Surfrider Foundation	Environmental NGO
Surfrider Foundation- Florida Chapters	Environmental NGO
Surfrider Foundation- Sebastian Inlet Chapter	Environmental NGO
Surfrider Outerbanks	Environmental NGO
The Dolphin Project	Environmental NGO
The Nature Conservancy	Environmental NGO
The Ocean Foundation	Environmental NGO
The Wilderness Society	Environmental NGO
Virginia Chapter of the Sierra Club	Environmental NGO
Virginia Chapter Sierra Club	Environmental NGO
Waterkeepers Chesapeake	Environmental NGO
Winyah Group	Environmental NGO
Winyah Rivers Foundation	Environmental NGO
World Wildlife Fund	Environmental NGO
Alaska Chamber	Government
Alaska Governor	Government
Alaska Senator John Coghill - Senate Majority Leader	Government
Beaufort County	Government
Board of Commissioners, Borough of Monmouth Beach	Government
Cape May County Chamber of Commerce	Government
City of Beaufort, SC	Government
City of Charleston	Government
City of Georgetown, SC	Government
City of Nags Head	Government
City of Tybee Island	Government
Clay County Chamber of Commerce	Government
Dare County Board of Commissioners	Government
Dare County Tourism Board	Government
Delaware Coastal Management Program	Government
GA Department of Natural Resources Nongame Section	Government
Idaho State Senate, Energy Producing States Coalition	Government
Kentucky House of Representative	Government
Marine Mammal Commission	Government
Maryland Coastal Bays Program	Government
Maryland Department of Natural Resources	Government
Mayor - Town of Sullivan's Island	Government
Mid-Atlantic Fishery Management Council	Government
National Park Service	Government
New Jersey Department of Environmental Protection	Government
NJ Dept of Environmental Protection	Government
North Carolina House of Representatives	Government

Organization Name	Organization Type
North Slope Borough	Government
Office of Rep. Frank Pallone, Jr	Government
Office of the Governor, North Carolina	Government
Outer Banks Chamber of Commerce	Government
Outer Banks Visitors Bureau	Government
Outer Continental Shelf Governors Coalition	Government
Sandbridge Beach Civic League	Government
SC Department of Natural Resources	Government
St. Johns County	Government
St. Johns County Commission	Government
State of Georgia House of Representatives	Government
State of South Carolina	Government
State Representative District 46, NC	Government
The Senate of South Carolina	Government
Town of Beaufort, NC	Government
Town of Duck	Government
Town of Hilton Head	Government
Town of Kill Devil Hills	Government
Town of Kitty Hawk	Government
Town of Manteo	Government
Town of Nags Head	Government
Town of Sunset Beach, Town Council	Government
Tybee Island, GA City Council	Government
Virginia DCR - Division of Natural Heritage	Government
Virginia DEQ, Division of Environmental Enhancement	Government
Wrightsville Beach Chamber of Commerce	Government
Alaska Frontier Constructors	Industry
Alaska Trucking Association	Industry
American Chemistry Council	Industry
American Iron and Steel Institute	Industry
American Trucking Associations	Industry
Associated Industries of Florida	Industry
Axistrade, Inc.	Industry
ConocoPhillips	Industry
Consumer Energy Alliance	Industry
Consumer Energy Alliance-Texas	Industry
Dominion Resources	Industry
Hawk Consultants	Industry
Kentucky Oil and Gas Association	Industry
LA 1 Coalition	Industry
Louisiana Oil & Gas Association	Industry
Louisiana Oil Marketers & Convenience Store Association	Industry
North American Submarine Cable Association	Industry
North Carolina Farm Bureau Federation	Industry
Northern Gas Pipelines	Industry
OffshoreAlabama.com	Industry
Partnership for Affordable Clean Energy	Industry
Perennial Environmental Services	Industry
Ports Association of Louisiana	Industry
Rock Acres Consulting	Industry
Shell	Industry
Solid Rock Engineering	Industry
Tennessee Oil and Gas Association	Industry
Texas Association of Business	Industry
Texas Association of Manufacturers	Industry
W. D. Scott Group, Inc.	Industry
Center for Regulatory Effectiveness	Industry NGO
Resource Development Council	Industry NGO

Organization Name	Organization Type
Numerous Businesses	Form Business
Seabrook retirement living complex	Form Business NGO
Alaska Wilderness League	Form Environmental NGO
Center for Biological Diversity	Form Environmental NGO
Chesapeake Climate Action Network	Form Environmental NGO
Coastal Conservation League	Form Environmental NGO
CREDO Action	Form Environmental NGO
Earthjustice	Form Environmental NGO
Food & Water Watch	Form Environmental NGO
Friends of the Earth	Form Environmental NGO
League of Conservation Voters	Form Environmental NGO
NC League of Conservation Voters	Form Environmental NGO
North Carolina Conservation Network	Form Environmental NGO
North Carolina League of Conservation Voters	Form Environmental NGO
Oceana	Form Environmental NGO
Oil Change International	Form Environmental NGO
Sierra Club	Form Environmental NGO
Southern Alliance for Clean Energy	Form Environmental NGO
API, NOIA, IPAA, AXPC, USOGA, IAGC, AOGA, US Chamber	Form Industry NGO
Consumer Energy Alliance	Form Industry NGO