

MARINE MAMMAL COMMISSION  
4340 East-West Highway, Room 700  
Bethesda, MD 20814-4447

15 September 2008

Ms. Renee Orr  
5-Year Program Manager  
Minerals Management Service (MS-4010)  
381 Elden Street  
Herndon, Virginia 20170

Dear Ms. Orr:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the Minerals Management Service's request for comments on whether it should initiate a new 5-year Outer Continental Shelf (OCS) oil and gas leasing program, as published in the 1 August 2008 *Federal Register* (73 Fed. Reg. 45065). The Commission offers the following recommendations and comments.

## RECOMMENDATIONS

The Marine Mammal Commission recommends that the Minerals Management Service work with the Department of Energy to—

- initiate a new 5-year oil and gas leasing program to supersede the current program, and
- conduct the environmental analyses needed to guide the public and decision-makers regarding the new program, including (a) a projection of the country's long-term energy needs based on expected population growth and economic expansion, (b) a description of all existing and potential sources of energy and trends in the development of those sources, (c) alternative approaches for meeting projected needs, including conservation, and the potential environmental impacts associated with those alternatives, and (d) a significant large-scale program aimed at reducing per capita energy demand, achieving greater efficiency in ongoing energy use, developing alternative energy sources, and reducing greenhouse gas production.

## RATIONALE

The current oil and gas leasing program pertains to the period from 2007 to 2012. Circumstances involving the exploration, production, distribution, and use of oil and gas and other energy sources have changed markedly in the United States and worldwide since the environmental analyses conducted prior to the current program. Oil and gas prices have soared, affecting virtually all sectors of our society and instilling in many a great sense of urgency regarding the development of energy sources under U.S. control, including both oil and gas and alternative sources. Oil and gas companies have increased their exploration activities in a number of locations where production was not previously economically feasible and where environmental conditions may be particularly sensitive to the adverse effect of energy production. In 2009 the new Administration will

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undoubtedly begin with ideas for addressing the nation's energy needs and production and may determine that a whole new strategy is warranted for both the immediate and long-term future. For all these reasons, the Marine Mammal Commission believes that decision-makers must have the benefit of the best available scientific information. To that end, the Marine Mammal Commission recommends that the Minerals Management Service, in consultation with the Department of Energy, initiate a new 5-year oil and gas leasing program to supersede the current program.

The United States has faced an impending energy crisis for decades but has neither responded with adequate foresight and commitment to address the crisis in its earlier stages nor shown the foresight to reduce our national dependence on hydrocarbons and minimize the production of greenhouse gases. Records of the production and use of oil and gas since the enactment of the Outer Continental Shelf Lands Act in 1953 illustrate historical patterns in oil and gas production and use, as do similar records for other energy sources. Those historical records, combined with anticipated population and economic growth, should be sufficient to project future patterns and potential consequences of continuing with a "business as usual" approach. A thoughtful and farsighted plan is needed to move the nation beyond efforts simply to find the next oil field. If left unchanged, the present course would have a number of undesirable consequences, including the acceleration of climate change and its multitude of adverse effects. To avoid repeating the pattern apparent in the past three to four decades, the Marine Mammal Commission recommends that the Minerals Management Service work with the Department of Energy to integrate a new 5-year oil and gas leasing plan with an overall energy conservation plan. The integrated version should include (a) a projection of the country's long-term energy needs based on expected population growth and economic expansion, (b) a description of all existing and potential sources of energy and trends in the development of those sources, (c) alternative approaches for meeting projected needs, including conservation, and the potential environmental impacts associated with those alternatives, and (d) a significant large-scale program aimed at reducing per capita energy demand, achieving greater efficiency in ongoing energy use, developing alternate energy sources, and reducing greenhouse gas production.

Please contact me if you have questions regarding these recommendations and comments.

Sincerely,



Timothy J. Ragen, Ph.D.  
Executive Director