

Thank you for your comment, Shaye Wolf.

The comment tracking number that has been assigned to your comment is POCSWS50038.

Comment Date: March 22, 2016 15:49:13PM
Well Stimulation Treatments on the Southern California OCS Draft EA
Comment ID: POCSWS50038

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Attachment: 16 03 21 Offshore fracking scientist sign-on letter final.pdf

Comment Submitted:

Please see attached comment letter submitted on behalf of 32 scientists, also copied below:

Dear Director Salerno, Director Hopper, Supervisor Yarde, and Chief Fish,

We write as scientists to urge you to conduct a comprehensive environmental review of the risks of hydraulic fracturing (“fracking”), acidizing, and other well-stimulation techniques off the California coast. We strongly advise you to continue the current moratorium on offshore well stimulation in California until a comprehensive review and scientific studies demonstrate that fracking and acidizing do not threaten wildlife, the marine environment, coastal communities, and the climate.

Scientific studies have documented that fracking and acidizing pose a wide range of risks to human communities and ecosystems. Documented threats include air and water pollution from toxic and carcinogenic chemicals used during well stimulation, climate disruption particularly due to methane leakage, increased earthquake risks, and significant harms to species and ecosystems from habitat loss and degradation, pollution, habitat avoidance, and human disturbance.

An independent scientific review of offshore well stimulation by the California Council on Science and Technology found significant data gaps on basic questions regarding offshore fracking and acidizing. Among these data gaps, the study found inadequate reporting of well stimulation events, the composition of well stimulation fluid, and toxicity data for common chemicals in fracking and acidizing fluids. In fact, the review found that “no studies have been conducted on the toxicity and impacts of well stimulation fluids discharged in federal waters to the marine environment.”

In January, BOEM and BSEE agreed to analyze the environmental impacts of offshore well stimulation. The draft environmental assessment, issued in February, offers a preliminary analysis of the impacts, including an acknowledgement of the many data gaps and uncertainties. The draft assessment highlights a clear need for a full evaluation of the impacts of offshore well stimulation on California’s coastal ecosystem, including the cumulative impacts of offshore well stimulation in light of the other industrial activities already impacting the coastal environment.

Given the well-documented environmental and health risks of well stimulation as well as significant data gaps, we urge you to conduct a comprehensive environmental review – an environmental impact statement – that thoroughly evaluates the risks. We strongly recommend that you continue the moratorium on offshore well stimulation until the final environmental impact statement is completed and until it is determined based on independent scientific studies that offshore well stimulation does not harm California’s diverse coastal and marine environment, the health and safety of coastal communities, and is consistent with state and national climate goals to rapidly reduce fossil fuel emissions.

Respectfully signed,

David Ackerly, PhD, Professor, University of California, Berkeley

Andreas Andersson, PhD, Associate Professor, Scripps Institution of Oceanography

Robert Bea, PhD, Professor Emeritus, Center for Catastrophic Risk Management, College of Engineering, University of

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Ken Caldeira, PhD, Climate Scientist, Carnegie Institution for Science

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Andrew Cohen, PhD, Director, Center for Research on Aquatic Bioinvasions

Tara Cornelisse, PhD, Assistant Professor, Canisius College

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Sylvia Earle, PhD, President, Mission Blue

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Catherine Gautier, PhD, Professor Emerita, University of California, Santa Barbara

Bill Henry, PhD, University of California, Santa Cruz

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Michael Mann, PhD, Distinguished Professor of Atmospheric Science, Penn State University

Susannah R. McCandless, PhD, International Program Director, Global Diversity Foundation

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Carl Safina, PhD, President, The Safina Center

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Leonard Sklar, PhD, Professor of Geology, San Francisco State University

Andrew Szasz, PhD, Professor and Chair, Environmental Studies, University of California, Santa Cruz

John Terborgh, PhD, Professor, Duke University

Bernie Tershy, PhD, Adjunct Professor, University of California, Santa Cruz

Kathryn Theiss, PhD, California State University, Dominguez Hills

Aradhna Tripathi, PhD, Associate Professor, University of California, Los Angeles

Abel Valdivia, PhD, Marine Scientist, Center for Biological Diversity

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March 22, 2016

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Scientific studies have documented that fracking and acidizing pose a wide range of risks to human communities and ecosystems. Documented threats include air and water pollution from toxic and carcinogenic chemicals used during well stimulation,¹ climate disruption particularly due to methane leakage,² increased earthquake risks,³ and significant harms to species and ecosystems from habitat loss and degradation, pollution, habitat avoidance, and human disturbance.⁴

An independent scientific review of offshore well stimulation by the California Council on Science and Technology found significant data gaps on basic questions regarding offshore fracking and acidizing.⁵ Among these data gaps, the study found inadequate reporting of well stimulation events, the composition of well stimulation fluid, and toxicity data for common chemicals in fracking and acidizing fluids. In fact, the review found that “no studies have been conducted on the toxicity and impacts of well stimulation fluids discharged in federal waters to the marine environment.”⁶

In January, BOEM and BSEE agreed to analyze the environmental impacts of offshore well stimulation. The draft environmental assessment, issued in February, offers a preliminary analysis of the impacts, including an acknowledgement of the many data gaps and uncertainties.⁷ The draft assessment highlights a clear need for a full evaluation of the impacts of offshore well stimulation on California’s coastal ecosystem, including the cumulative impacts of offshore well stimulation in light of the other industrial activities already impacting the coastal environment.

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References

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- ⁶ *Id* at 29.
- ⁷ BSEE and BOEM [Bureau of Safety and Environmental Enforcement, Bureau of Ocean Energy Management]. 2016. *Programmatic Environmental Assessment of the Use of Well Stimulation Treatments on the Southern California Outer Continental Shelf*. Prepared by Argonne National Laboratory. February 2016.