

March 22, 2016

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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,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.

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,

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