

NASA Comments on BOEM 2017-2022 Five-Year Plan Request for Information

August 2014

After reviewing the June 16, 2014 *Federal Register* notice entitled *Request for Information and Comments on the Preparation of the 2017-2022 Outer Continental Shelf (OCS) Oil and Gas Leasing Program*, the National Aeronautics and Space Administration (NASA) would like to express its continued concern regarding the potential impacts that oil and gas development off the coast of Virginia would have on the operations at Wallops Flight Facility (WFF).

Consistent with our concerns raised in the past during the development of the 2007-2012 OCS Five-Year Plan, Lease Sale 220, the 2012-2017 OCS Five-Year Plan, and most recently, the Atlantic Geological and Geophysical Programmatic Environmental Impact Statement (PEIS), the presence of either temporary or fixed structures at or below the sea surface, within our range's hazard areas, would have significant detrimental effects on our ability to conduct aerospace test activities. Even the temporary presence of support ships or aircraft within a mission's hazard areas can result in mandatory range safety criteria not being met, leading to missed launch opportunities. Ensuring public safety and protection of high value assets are NASA's primary mandates in conducting its range operations. Therefore, the range must be clear of personnel and property prior to conducting launches. This consideration is especially important for high-priority missions with very narrow (often five minutes or less) launch windows, such as the twice-per-year International Space Station cargo resupply missions or suborbital science missions that must launch into ephemeral geophysical targets.

We understand that the National Environmental Policy Act process for the 2017-2022 OCS Five-Year Plan is forthcoming. That said, we would like to take this opportunity to notify the Bureau of Ocean Energy Management (BOEM) of NASA's desire to serve as a Cooperating Agency (CA) during the preparation of the the Five-Year Plan PEIS. As a CA, NASA staff would work closely with BOEM personnel in evaluating how oil and gas developments and WFF's operations could potentially coexist. NASA's special expertise on the location and nature of launch range hazards, and how WFF's operations could pose a direct risk to offshore infrastructure, personnel, and ultimately, the environment, would be necessary to find a solution where both activities could safely be conducted.

As part of our early planning for serving in this role, we have prepared an updated assessment of potential mission conflicts and have identified areas in the Mid-Atlantic Planning Area where *both* NASA and oil and gas interests may be able to co-exist. A preliminary revised map that shows the level of potential impact on our operations is enclosed for your review.

Please consider this request to work with us to enable the expanded utilization of our nation's offshore oil and gas resources, while also allowing the next generation of government and commercial aerospace programs to prosper at WFF. We are committed to working closely with BOEM in all future efforts to identify and prioritize areas that would enable offshore oil and gas development, but would be sited in such a manner that potential impacts to WFF's operations would be minimized.

We look forward to hearing from you regarding these comments and our CA request. In the meantime, if you have any questions or require additional information, please contact Mr. Joshua Bundick, Lead, Environmental Planning at WFF, at (757) 824-2319 or by e-mail at Joshua.A.Bundick@nasa.gov.

Impacts of OCS Oil & Gas Leasing on NASA's Wallops Flight Facility

Atlantic Planning Areas

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Prepared in response to 2017-2022 5-Year Plan RFI (79 FR 34349)

Wallops Flight Facility

50 nmi

100 nmi

250 nmi

350 nmi

500 nmi

0 25 50 100 Nautical Miles

Legend

-  Major Impact
-  Moderate Impact
-  Minor Impact
-  Recent Mission Hazard Areas
-  Planning Area Boundary
-  Radial Distance from WFF

