

TOWN OF SEABROOK ISLAND

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July 31, 2017

Ms. Kelly Hammerle
National Program Manager
Bureau Ocean Energy Management
45600 Woodland Road, Mailstop VAM-LD,
Sterling, VA 20166.

Re: Bureau of Ocean Energy Management. Request for Information
82, Federal Register, 30886, July 3, 2017
National Outer Continental Shelf Oil and Gas Leasing Program for 2019-2024

Ms. Hammerle:

This letter is written on behalf of the Town of Seabrook Island, South Carolina, in response to the Bureau of Ocean Energy Management ("BOEM") recently published request for information and comments ("RFI") on the preparation of a new five-year National Outer Continental Shelf Oil and Gas Leasing Program for 2019-2024 (hereinafter, the "2019-2024 Program") (82, Federal Register, 30886, July 3, 2017). The 2019 – 2024 Program will replace the National OCS Program for 2017-2022 (hereinafter, the "2017-2022 Program"), which was approved on January 17, 2017, and which specifically excluded the sale of offshore leases in the Mid-Atlantic and South Atlantic Planning Areas. While the RFI requests comments on all twenty-six Planning Areas, our comments are limited to the Mid-Atlantic and South Atlantic Planning Areas, in general, and the South Carolina coast, in particular.

Seabrook Island is a coastal barrier island. Its residents take both pride and pleasure in our environment. Our beaches are home to maritime forests and serene marshes and are enjoyed both by residents and thousands of visitors to our island each summer. In 2015, in response to the then proposed 2017-2022 Program, the Town of Seabrook Island, along with virtually every other coastal South Carolina community, took formal positions strongly against the inclusion of the Mid and South Atlantic planning areas in the Department of Interior's proposed 2017 – 2022 oil and gas leasing program. At that time, we expressed concern about the potential for significant adverse environmental impact on marine life, coastal wetlands, beaches and the tourism industry. Furthermore, we were skeptical of claims of potential economic benefit to our state. We believed then, as we believe now, that the potential adverse environmental impacts associated with constructing and operating offshore oil and gas industry and its supporting infrastructure would far outweigh any potential economic benefits to the State of South Carolina and its coastal communities.

We believe that the greatest concern with offshore drilling continues to be the potential risk of a large oil spill and the consequential environmental and economic damages. The consequences of the Deepwater Horizon spill in the Gulf of Mexico in 2010 continue to adversely affect the beaches of Alabama and Louisiana. However, it is not just the risk of disasters such as Deepwater Horizon that are at issue, but also the continuous, chronic cumulative small spills and leaks that can have long term environmental impacts.

In addition, the production of gas found on any of the leased property would, by necessity, be accompanied by the construction of infrastructure to transport and refine the produced product. One need only drive from New Orleans to Gulfport to see the industrial character of the infrastructure. It would be totally incompatible with Seabrook Island's pristine beaches, portions of which have been designated by the United States Fish and Wildlife Department as critical habitats for the loggerhead turtle and the wintering piping plover. Even a minor spill, which must be anticipated from the production of oil and gas, could significantly and adversely affect the habitat of these species.

The Town of Seabrook Island vigorously restates its objection to the inclusion of the Mid and South Atlantic planning areas in the Department of Interior's proposed 2017 – 2022 oil and gas leasing program. The Town believes that it would be more economically and ecologically responsible for the Department to pursue non-polluting sources of renewable energy though solar, wind and biomass energy production processes that pose less risk to our coastal environment and economic health before using seismic blasting for off-shore gas exploration.

Very truly yours,



R. J. Ciancio
Mayor

cc: Senator Lindsey Graham
Senator Tim Scott
Representative Mark Sanford