

June 10, 2016

Ms. Kelly Hammerle, Five-Year Program Manager  
Bureau of Ocean Energy Management  
45600 Woodland Road (VAM-LD)  
Sterling, Virginia 20166

**Re: Comments on 2017-2022 Proposed Program  
Docket No. BOEM-2016-0003**

Dear Ms. Hammerle,

The Southern Alliance for Clean Energy (SACE) is a regional organization that promotes responsible energy choices that create global climate change solutions and ensure clean, safe, and healthy communities throughout the Southeast. We welcome this opportunity to engage in a thoughtful discussion on offshore energy and thank you for your willingness to accept comments and incorporate feedback into the proposed 2017-2022 Five Year Program.

We support the Administration's decision to remove the Atlantic lease sale from the Proposed Program. Oil and gas exploration and development in the Atlantic is incompatible with the way we use and value our coast and, as such, the Atlantic should remain off-limits to these activities.

As noted in the Proposed Program, the economy of the Atlantic coast has not co-evolved with the offshore oil and gas industry over the course of the 20<sup>th</sup> century, as the Gulf coast did. Therefore, the Atlantic coast has developed industries, character, and livelihoods based upon a largely non-industrialized coastline and coastal waters free of the pollution that is intrinsic to the oil and gas industry.<sup>1</sup>

The Southeast coast offers a high quality of life to residents and visitors alike, due in large part to the scenic beauty and recreational value of natural assets like our beaches and marshes. These natural resources form the foundation of a robust tourism economy that employs hundreds of thousands of coastal residents and generates billions of dollars in the regional economy.<sup>2</sup> They are also a primary reason why thousands of people and businesses chose to move to the Southeast coast each year, representing additional economic development. Nature-based activities such as visiting the beach, fishing, and paddling are not only concerned with economics though, but also represent pastimes, traditions, and ways of life for coastal residents.

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<sup>1</sup> BOEM. *2017-2022 Outer Continental Shelf Oil and Gas Leasing Proposed Program*. Page S-9. March 2016.

<sup>2</sup> National Ocean Service. *ENOW Explorer*. <https://coast.noaa.gov/enowexplorer/#/>

These assets and their contributions to quality of life and our economy are reliant upon clean beaches and a healthy ocean ecosystem, which would be jeopardized by offshore oil and gas development.

Industrial infrastructure that is part and parcel of the offshore oil and gas industry in the Gulf—such as refineries, processing facilities, and pipelines—would alter the character of our coast and, in turn, affect our existing economies. Additionally, pollution intrinsic to the offshore oil and gas industry, including routine discharges and unintentional spills, would threaten the vitality of our coast. While large, catastrophic oil spills may be infrequent, thousands of smaller spills are reported annually in the Gulf.<sup>3</sup> Given the extreme environment offshore, leaks can be difficult to identify and repair, and may last long stretches of time, such as the ongoing spill from the Taylor Energy Mississippi Canyon 20-A platform that has been releasing oil into the Gulf for the past 12 years and still is not repaired.<sup>4</sup> And even as large spills are infrequent, they are reliable and have occurred regularly throughout the history of the offshore oil and gas industry. When they do occur, catastrophic oil spills, such as the Macondo<sup>5</sup> and Ixtoc 1<sup>6</sup> well blowouts, have been documented to temporarily decimate tourism industries and fisheries-based livelihoods, which would be an impact unacceptable to the residents of the Atlantic coast.

Meanwhile the potential benefits from Atlantic offshore drilling cannot possibly justify the risk of development.

Economic development resulting from an Atlantic lease sale are modest and dwarfed many times over by the economic impact already provided by existing industry, which would be jeopardized by development. While the tourism industry alone employs hundreds of thousands along the coastal Southeast, BOEM's Draft Programmatic Environmental Impact Statement estimates a job impact of 2,000 to 4,000 annual average jobs resulting from an Atlantic lease sale, with just 41% of those jobs (820 to 1,640 jobs) within the Atlantic region and the rest in the Gulf of Mexico region or elsewhere in the U.S.<sup>7</sup>

Similarly, with extremely modest potential production of oil and gas from Atlantic development, a lease sale cannot be justified on the basis of energy security or lowering the cost of energy for consumers. BOEM estimates in the Proposed Program that that the

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<sup>3</sup> United States Coast Guard. National Response Center. <http://www.nrc.uscg.mil/>

<sup>4</sup> Associated Press. "Collapsed Gulf oil platform has been leaking since 2004, investigation finds." *The Times-Picayune*, April 16, 2015.  
[http://www.nola.com/environment/index.ssf/2015/04/gulf\\_oil\\_spill\\_hidden\\_2004.html](http://www.nola.com/environment/index.ssf/2015/04/gulf_oil_spill_hidden_2004.html)

<sup>5</sup> Dahr Jamail. "Gulf ecosystem in crisis after BP spill." *Al Jazeera*, October 20, 2013.  
<http://www.aljazeera.com/indepth/features/2013/10/gulf-ecosystem-crisis-after-bp-spill-2013102065313544754.html>

<sup>6</sup> Aaron Sharockman. "Offshore oil drilling has cost tourism industry before." *Politifact*, October 5, 2009.  
<http://www.politifact.com/truth-o-meter/statements/2009/oct/05/barney-bishop/offshore-oil-drilling-has-cost-tourism-industry-st/>

<sup>7</sup> BOEM. *Outer Continental Shelf Oil and Gas Leasing Program: 2017-2022 Draft Programmatic Environmental Impact Statement*. Page 4-99. March 2016.

Atlantic lease sale would lead to just a 0.10% increase in national oil production and a 0.06% increase in national natural gas production.<sup>8</sup> Such small amounts of production would translate into virtually no impact on energy pricing for consumers, even while exposing coastal communities and states to the liability of potential costs in the form of oil spill impacts.

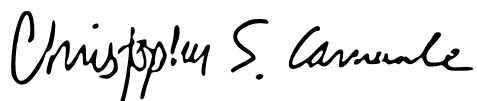
As such, coastal residents, businesses, and local governments have presented a clear, united, and unambiguous voice expressing opposition to offshore drilling in the Atlantic. To date, more than 100 local governments and more than 1,000 East Coast businesses have called for no offshore drilling and/or seismic exploration in the Atlantic.

We echo this call to keep the Atlantic closed to offshore drilling and request of the Administration additional, longer-lasting protections against the impacts of offshore drilling, such as the cancellation of plans for seismic exploration in the Atlantic. The case against Atlantic drilling presented by communities along the Southeast coast will not change in a matter of a few years and it is difficult, if not impossible, to imagine a scenario in which the economic, social, and environmental factors swing so wildly that the cost:benefit analysis of Atlantic drilling would measurably change in near term years. Without a clear path to Atlantic leasing, the continuation of permitting for seismic exploration is unduly harmful and risky for the ocean ecosystem and fisheries as well as for their dependent economies and cultures.

Emphasis should be placed by the Administration instead on developing clean, safe renewable energy that offers substantial economic and environmental benefits without the intrinsic risk presented by offshore oil and gas drilling.

Respectfully submitted,

Chris Carnevale

A handwritten signature in black ink that reads "Christopher S. Carnevale". The signature is written in a cursive, flowing style.

Coastal Climate & Energy Manager  
Southern Alliance for Clean Energy

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<sup>8</sup> BOEM. *2017-2022 Outer Continental Shelf Oil and Gas Leasing Proposed Program*. Page S-10. March 2016.