

TOWN OF HILTON HEAD ISLAND

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June 26, 2017

David Bennett
Mayor

Kim W. Likins
Mayor ProTem

Council Members

David Ames
Marc A. Grant
William D. Harkins
Thomas W. Lennox
John J. McCann

Stephen G. Riley
Town Manager

Jolie Harrison, Chief (itp.laws@noaa.gov)
Permits and Conservation Division
Office of Protected Resources (NOAA)
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Re: 5 Proposals to conduct geophysical surveys using seismic air gun arrays in the Atlantic Ocean/Incidental harassment authorizations/Document No. 2017-11542

Dear Ms. Harrison:

The Town of Hilton Head Island is blessed with a beautiful, pristine island environment. On March 17, 2015, at a public Town Council meeting, Council voted 7-0 to oppose seismic testing because, in part, we believe our contribution to others should be the environmental stewardship example we have set and less toward the risk associated with seismic surveys. Our legacy and our commitment to current and future generations are focused on environmental sensitivity and protection. We heard from many residents who spoke against seismic testing. In 2015, we sent opposition letters to the Department of the Interior's Bureau of Ocean Energy Management regarding CGG Services, Inc. and GXT, Inc.'s seismic surveying proposals.

As we understand in January 2017, the 2017-2022 OCS Oil and Gas Leasing program was approved by the Obama Administration, with exclusion of lease sales in certain areas including the Atlantic Ocean. Furthermore, we understand that on April 28, 2017, President Trump issued an Executive Order which eliminated the previous Administration's OCS leasing withdrawals. As a result, BOEM has rescinded the denial of the federal permit applications, which are now undergoing review by your agency. Therefore, the Town of Hilton Head Island would like to reiterate its opposition to the 5 proposals to conduct geophysical surveys using seismic air gun arrays in the Atlantic Ocean.

As a coastal community that relies heavily on tourism, the Town is very concerned with the potential impact of opening the mid-Atlantic Ocean to seismic surveying and believes that more research should be done to fully understand and to better address the impacts of seismic surveying and the options for mitigating those impacts before exploration begins for the following reasons:

- Seismic air-guns fire intense blasts of compressed air, one of the loudest human-made sounds in the ocean. These dynamite-like blasts can occur as frequently as every ten seconds, for days to weeks at a time and are loud enough to cause a range of impacts on both aquatic life and marine mammals, including broad habitat displacement, disruption of vital behaviors essential to breeding, loss of biological diversity, and in some circumstances, injuries and mortalities.
- Despite the assertions by the 5 companies seeking the permits that the proposed activities would have minimal impact on fisheries, the available science suggests that seismic surveys would have significant consequences for both commercial and recreational fishing industries.

- This significant risk to both commercial and recreational fishing industries would jeopardize a substantial component of South Carolina's economy. According to South Carolina's OCRM, marine fisheries provide over a billion dollars in economic value to the state; coastal tourism is responsible for approximately half of a \$19 billion tourism industry in South Carolina.
- Seismic surveying will have a significant impact on sea turtles, an endangered and threatened species, ignoring the fact that beaches along South Carolina coast provide important habitats for nesting sea turtles. In 2016, there were 6,444 loggerhead sea turtle nests along the South Carolina coast.
- We believe NOAA should consider the fact that seismic surveys are only the first step towards oil drilling off the coast of South Carolina. The future impacts of the activities that will be facilitated by seismic surveys should be considered as part of NOAA's cumulative impacts analysis.

We appreciate the opportunity to convey our position and trust our comments will be taken into account.

Sincerely,



David Bennett, Mayor

cc: Town Council
Stephen G. Riley, ICMA-CM, Town Manager
Senator Tim Scott, U.S. Senate
Senator Lindsey Graham, U.S. Senate
Representative Mark Sanford, U.S. House of Representatives
Representative James Clyburn, U.S. House of Representatives
Beaufort County Legislative Delegation