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August 14, 2017

Secretary Ryan Zinke  
Department of Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

**Re: State of Delaware Response to the Request for Information and Comments on the Preparation of the 2019-2024 National Outer Continental Shelf Oil and Gas Leasing Program**

Dear Secretary Zinke,

On behalf of the State of Delaware, please consider the following comments in response to the Bureau of Ocean Energy Management (BOEM) notice titled, "Request for Information and Comments on the Preparation of the 2019-2024 National Outer Continental Shelf Oil and Gas Leasing Program" published in the July 3, 2017 Federal Register. Section 18(2)(F) of the Outer Continental Shelf Lands Act (OCSLA) tasks BOEM with considering the "laws, goals, and policies of affected States which have been specifically identified by the Governors of such States" and section 19 of the same statute outlines the process for coordination and consultation with affected states and local governments.

The State of Delaware is opposed to any future exploration, leasing, development or production of oil and gas in the Atlantic Ocean.

The Delaware Department of Natural Resources and Environmental Control was actively engaged in reviewing and commenting on the previously approved plan for years 2017-2022. This plan was developed in accordance with the OCSLA, and received 1.83 million comments from the public, state agencies, industry representatives, elected officials and other stakeholders. The plan made available 70 percent of the oil and gas resources identified by the BOEM as economically recoverable, as well as nearly half of the estimated undiscovered technically recoverable offshore oil and gas resources<sup>1</sup>. Reinitiating plan development at this point, months into the effective dates of the 2017-2022 plan, is an inefficient use of government resources, and merely politicizes what should be a data-driven and public process. As stated during the 2017-2022 plan development, and restated here: Delaware is opposed to oil and gas exploration in the Atlantic Ocean.<sup>2</sup>

Delawareans rely upon and enjoy our abundant coastal resources. Over 60,000 jobs directly or indirectly support the fishing, tourism and recreation sectors. Coast-related activities contribute almost \$7 billion in economic production to the state. According to a 2012 analysis performed by the Delaware Sea Grant, more than 10 percent of the State's total employment, taxes and production value can be attributed to coastal related activities<sup>3</sup>. Preserving the coastal environment is essential to Delaware's economic well-being, as well as vital to maintaining a high quality of life for its residents. The majority of coastal residents perceive offshore oil and gas exploration as a threat to their communities and livelihoods. In fact, many of Delaware's coastal towns have passed resolutions opposing drilling and seismic exploration surveys.

The marine habitats of the Atlantic Ocean, and the species that rely upon them, are nationally shared resources that do not adhere to federally designated offshore boundaries. Intensive exploration and development activities within the Atlantic planning areas can potentially affect ocean health, degrade benthic habitats and result in negative impacts to marine mammals, fish, sea turtles and other species. Of particular importance are the Atlantic canyons located offshore from Massachusetts to Virginia along the continental shelf

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<sup>1</sup> Cruickshank, W.D. 2017. *Record of Decision and Approval of the 2017-2022 Outer Continental Shelf Oil and Gas Leasing Program*. Retrieved from <https://www.boem.gov/2017-2022-Record-of-Decision/>

<sup>2</sup> BOEM. (2016). *2017-2022 Outer Continental Shelf Oil and Gas Leasing Proposed Final Program*. Retrieved from <https://www.boem.gov/2017-2022-OCS-Oil-and-Gas-Leasing-PFP/>

<sup>3</sup> Latham, W., Lewis, K. (2012). *The Contribution of the Coastal Economy to the State of Delaware*, Delaware Sea Grant, Newark, De.

break. The Obama Administration recognized the unique ecological value of these geologic features and their importance in supporting the economic viability of the fishing industry. Under authority granted in section 12(a) of the Outer Continental Shelf Lands Act, President Obama permanently protected these canyons from oil and gas exploration, development and production activities. The State of Delaware is grateful that these biologically rich areas will forever provide unspoiled habitats to sustain a multitude of commercially and recreationally important species, marine mammals and other key species.

Further, the National Ocean Council, formed as a result of President Obama's 2010 Executive Order 13547, directed state and federal agencies, recognized tribes and the Mid-Atlantic Fishery Management Council to draft and implement comprehensive ocean plans and address offshore energy development. The Mid-Atlantic Regional Ocean Action Plan was the outcome of years of data collection, stakeholder collaboration and public outreach and input. The forward thinking taskforce identified renewable energy as the focus for its plan, stating in its 2016 report, "Offshore wind represents a significant renewable energy opportunity in the near term, due to advancing technology and its potential siting near critical load centers."<sup>4</sup>

In contrast, expanding fossil fuel production is undeniably counter-productive to reducing carbon emissions, and hinders progress toward long-term sustainable energy sources such as wind and solar. As one of the lowest lying states in the Nation, Delaware takes the threat of sea level rise and climate change seriously, and is proactively pursuing measures to reduce the State's vulnerability to these threats. According to a 2014 public opinion survey of Delaware residents, 76 percent of respondents believe immediate action should be taken to reduce impacts from climate change<sup>5</sup>. With this support, Delaware is changing its approach to land use decisions; strengthening infrastructure through beach replenishment, dike reconstruction and other projects; and reducing greenhouse gas emission through pollution controls and the utilization of cleaner burning fuels for electricity generation.

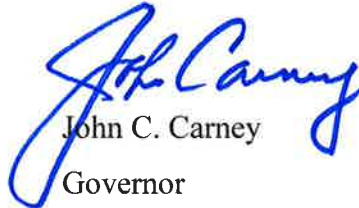
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<sup>4</sup> BOEM. (2016). *Mid-Atlantic Regional Ocean Action Plan*. Retrieved from <https://www.boem.gov/Mid-Atlantic-Regional-Ocean-Action-Plan/>

<sup>5</sup> DNREC, et al. (2014). *Delaware Residents' Opinions on Climate Change and Sea Level Rise*. Retrieved from <http://www.dnrec.delaware.gov/coastal/Pages/CCSLRSurvey.aspx>

We as a Nation share the responsibility to ensure that energy decisions do not exacerbate the problems associated with climate change that are already being witnessed. The State of Delaware stands firm in its commitment to alternative energy development, and has prioritized working with neighboring states to develop a comprehensive strategy that will maximize the environmental and economic development benefits of adopting renewable energy. As such, I am opposed to any oil and gas leasing in federal waters offshore of Delaware, or elsewhere in the Atlantic.

Sincerely,



John C. Carney  
Governor

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cc: Senator Tom Carper  
Senator Chris Coons  
Representative Blunt-Rochester  
Walter Cruickshank- BOEM, Acting Director  
Shawn Garvin- DNREC, Secretary  
Kelly Hammerle-BOEM, National Program Manager