

TOWN OF HILTON HEAD ISLAND

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March 19, 2015

David Bennett
Mayor

William D. Harkins
Mayor ProTem

Council Members

Wm. Lee Edwards
Marc A. Grant
Thomas W. Lennox
Kim W. Likins
John J. McCann

Stephen G. Riley
Town Manager

Curtis Joyner, Manager (joynercm@dhec.sc.gov)
Coastal Zone Consistency Certification Section
DHEC-OCRM
1362 McMillan Avenue
Suite 400
Charleston, SC 29405

Re: 2D Seismic Survey off the SC coast beginning 84 km offshore out to the 350 nm US Extended Continental Shelf/CGG Services, Inc. (Notice No. CZC-15-0170) and 2D Seismic Survey off the US Mid and South Atlantic Coast from Delaware to Florida from 20 kilometers to 600 kilometers from the coast/GXT, Inc. (Notice No. CZC-15-0144)

Dear Mr. Joyner:

As you are aware, 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.

A primary goal of South Carolina's coastal management program (CMP) is the "development of a management program that will achieve a rational balance between economic development and environmental conservation of natural resources in the coastal zone of South Carolina." Therefore, we believe OCRM should not certify any activity, including seismic surveying, as being consistent with the CMP if it will have a significant negative impact on marine and aquatic wildlife and fisheries resources and stock without full consideration of the ecological and economic impact on the state of South Carolina and its coastal communities.

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 CGG Services, Inc. and GXT, Inc. 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 OCRM, marine fisheries provide over a billion dollars in economic value to the state; coastal tourism is responsible for approximately half of a \$17 billion tourism industry in South Carolina and more than an estimated \$1.5 billion into the Hilton Head Island area economy; and the impact of outdoor recreational tourism related coastal tourism to the state is approximately \$7 billion.
- 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 2014, South Carolina turtle nests 2,071 loggerheads, 8 greens, and 2 leatherbacks.
- We believe OCRM 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 OCRM's cumulative impacts analysis.
- In light of the enforceable policies of the CMP, the special natural resources it is designed to protect, and the threats to marine and aquatic life from seismic surveying, the Town believes that CGG's and GXT's proposals are inconsistent with South Carolina's coastal zone management plan.

Town Council voted to oppose all seismic survey applications to DHEC whenever they arise.

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
Beaufort County Legislative Delegation Members
Stu Rodman, Beaufort County Council Member