



St. Johns County Board of County Commissioners

County Commission Office

April 3, 2014

Mr. Gary D. Goeke, Chief
Regional Assessment Section
Office of Environment (MS5410)
Bureau of Ocean Energy Management
Gulf of Mexico OCS Region
1201 Elmwood Park Boulevard,
New Orleans, LA 70123-2394

Re: Final Programmatic Environmental Impact Statement

Dear Mr. Goeke:

Please accept this letter addressing the Final Programmatic Environmental Impact Statement (PEIS) that was prepared to evaluate the potential environmental impacts of geological and geophysical survey activities in Federal waters of the Mid- and South- Atlantic Outer Continental Shelf (OCS) and adjacent State waters for the 2012-2020 time period. St. Johns County has a vested interest as any activity approved in the South Atlantic OCS would potentially impact the waters and beaches in our County.

St. Johns County opposes the use of large or small seismic airgun surveys. The invasive seismic survey procedure of blasting pulsating shocks of noise loud enough to penetrate deep into the sea bed and across vast ocean areas to search for possible oil and gas reserves would detrimentally impact marine habitat and potentially destabilize marine ecosystems. As an example, the PEIS reads, "Direct physical injury, which might result in death, may occur from exposure to high levels of sound or, more commonly, to shock waves associated with sound-producing events such as in-water explosions where the velocity of expansion of the bubble causing the pulse is higher than the speed of sound in water. These pulses are typically short, with peak pressures that may damage internal organs or air-filled body cavities (e.g., lungs)." This extent of detrimental impact on the marine environment, including marine mammals, fish, and sea turtles is objectionable.

In addition, the approval of seismic airgun surveys at this time is premature. The National Oceanic and Atmospheric Administration (NOAA) is in the process of updating critical information pertinent to the issue. The finalization of the *Draft Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammals* will update acoustic threshold levels for marine mammals. These thresholds will replace those currently in use by NOAA and will include protocol for estimating levels for airgun sound sources. Therefore the approval of the PEIS is essentially approving an outdated and potentially flawed document.

Mr. Gary D. Goeke

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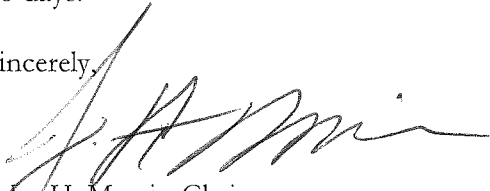
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St. Johns County opposes oil and gas drilling in the Atlantic Ocean. The potential for St. Johns County to be adversely impacted by this activity is significant. NOAA's Office of Response and Restoration reports that, "Oil Spills some large, more often small - happen along the coasts, Great Lakes, and major rivers of the United States nearly every day." Florida has already felt the devastating effects of an uncontrolled oil release with the Deepwater Horizon event of which cleanup efforts are still on-going. Any oil spill, large or small, off the coast of St. Johns County would greatly affect the County's economy which is largely based on tourism and on recreational and commercial fishing.

Although the comment period was extended 30 days to May 7th, the comment period remains too brief for a comprehensive review of this complex and critical document and associated data, and fails to allow time for the citizens of St. Johns County to review and provide their comments. Therefore, St. Johns County is requesting that the comment period be extended for at least an additional 30 days.

In summary, St. Johns County requests that BOEM deny the geological and geophysical survey applications, deny any application for oil or gas drilling in the Atlantic Ocean in or near the shorelines of St. Johns County, and extend the comment period for the PEIS by an additional 30 days.

Sincerely,



John H. Morris, Chair
St. Johns County Commission

JM/ld

cc: St. Johns County Board of County Commissioners
Michael D. Wanchick, County Administrator