



Florida Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

August 17, 2017

Ms. Kelly Hammerle
National Program Manager
Bureau of Ocean Energy Management
45600 Woodland Road
Mailstop VAM-LD
Sterling, Virginia 20166

Dear Ms. Hammerle:

The Florida Department of Environmental Protection (DEP) has coordinated a review of the U.S. Department of Interior, Bureau of Ocean Energy Management's (BOEM) notice requesting information in the preparation of a new Five-Year National Outer Continental Shelf (OCS) Oil and Gas Leasing Program for 2019-2024. The proposed program is intended to replace the 2017-2022 program which was approved on January 17, 2017.

Florida's coastal and offshore areas have high environmental and economic value not only for Florida, but also for the nation. In addition, several areas offshore Florida are considered an essential component for developing and sustaining military readiness. The state remains concerned about the effects of OCS oil and gas activities on marine and coastal environments and the sensitive biological resources and critical habitats associated with them as well as the military activities critical to the nation's security. As BOEM proceeds with the development of a proposed plan for oil and gas activities, the long-term protection of Florida's sensitive coastal and marine resources should be of paramount concern.

As seen with the Deepwater Horizon oil spill, accidental spills resulting from OCS oil and gas activities in the Gulf of Mexico can affect Florida's resources and have caused negative impacts to Florida's environmental resources, fisheries, tourism and economy. It is imperative that safety and environmental protection be paramount in conducting OCS oil and gas activities.

In addition, the enclosed comments from the Florida Department of State, Florida Fish and Wildlife Conservation Commission, Florida Geological Survey, and Treasure Coast Regional Planning Council were received during the review.

Ms. Hammerle
August 17, 2017
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Florida appreciates the opportunity to comment on the preparation of the 2019-2024 National OCS Program and look forward to working with BOEM to ensure the protection of our marine and coastal resources.

Sincerely,

A handwritten signature in blue ink, reading "Rebecca Prado". The signature is fluid and cursive, with the first name "Rebecca" and last name "Prado" clearly distinguishable.

Rebecca Prado
Deputy Director, Florida Coastal Office
Coastal Program Administrator



FLORIDA DEPARTMENT of STATE

RICK SCOTT

Governor

KEN DETZNER

Secretary of State

Ms. Shana Kinsey-Carlsen
Department of Environmental Protection
3900 Commonwealth Boulevard, MS 235
Tallahassee, FL 32399-3000

July 25, 2017

RE: DHR Project File No.: 2017-3610, Received by DHR: July 7, 2014
BOEM Request for Information/Comment: 5-Year OCS Oil and Gas Leasing Program for 2019-2024
SAI#: FL201707078057

Dear Ms. Kinsey-Carlsen:

This office reviewed the referenced document to identify issues for possible concerns regarding impact to historic properties listed, or eligible for listing, in the *National Register of Historic Places*. Our review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966* as amended, Chapters 267 and 373, *Florida Statutes*, Florida's Coastal Management Program, and implementing state regulations, for possible impact to historic properties listed, or eligible for listing, in the *National Register of Historic Places*, or otherwise of historical, architectural, or archaeological value. The State Historic Preservation Officer is to advise and assist state and federal agencies when identifying historic properties, assessing effects upon them, and considering alternatives to avoid or minimize adverse effects.

We reviewed the information submitted regarding the proposed 5-year leasing program. Should the moratoria areas offshore of Florida be opened in the future for leasing and exploration, this agency would have concerns about potential adverse impacts to significant archaeological resources. However, if requirements are in place for historic resources surveys to locate and evaluate historic sites and properties, and measures are undertaken for the avoidance of adverse impacts to significant resources, then it will be the opinion of this agency that historic resource concerns are adequately addressed.

If you have any questions, please contact Deena Woodward, Community Assistance Consultant, by email at Deena.Woodward@dos.myflorida.com, or by telephone at 850.245.6333 or 800.847.7278.

Sincerely,

Timothy A. Parsons, Ph.D., RPA
Director, Division of Historical Resources
& State Historic Preservation Officer

Division of Historical Resources
R.A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399
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MyFWC.com

August 11, 2017

Ms. Shana Kinsey-Carlsen
Florida Department of Environmental Protection
Florida Coastal Office
3900 Commonwealth Blvd.
Mail Station #235
Tallahassee, FL 32399
Shana.Kinsey@dep.state.fl.us

RE: Request for Information/Comment: 5-Year National Outer Continental Shelf (OCS) Oil and Gas Leasing Program for 2019-2024, SAI #FL201707078057, Multiple Counties

Dear Ms. Kinsey-Carlsen:

Florida Fish and Wildlife Conservation Commission (FWC) staff has reviewed the U.S. Department of the Interior, Bureau of Ocean Energy Management (BOEM) request for information related to the above-referenced project. As requested, the following technical assistance is provided pursuant to the federal National Environmental Policy Act (NEPA), the federal Coastal Zone Management Act, and the State of Florida Coastal Management Program.

Background

BOEM is requesting information and comment as the first step in the preparation of a new 5-Year National Outer Continental Shelf (OCS) Oil and Gas Leasing Program (National OCS Program) for 2019-2024. Upon completion, the new National OCS Program will replace the National OCS Program for 2017-2022, which was approved on January 17, 2017.

The OCS Lands Act requires that a 5-Year National OCS Program be based on a comparative analysis of all oil and gas bearing regions. Therefore, the BOEM is soliciting information and comment concerning all 26 planning areas of the OCS, including those currently under congressional moratoria or withdrawn from leasing. The three planning areas located offshore Florida are:

- the eastern Gulf of Mexico Planning Area (GOMPA);
- the Straits of Florida Planning Area (SOFPA); and
- a portion of the South Atlantic Planning Area (SAPA).

Environmental Sensitivity and Marine Productivity of the Three Florida Planning Areas

Listed Species

State- and federally listed fish and wildlife species may occur in the three planning areas located off Florida. These species are listed and managed in the State of Florida and adjacent waters pursuant to the following authorities:

- Florida Endangered and Threatened Species Act (Section 379.2291, Florida Statutes)
- Florida Marine Turtle Protection Act (Section 379.2431, Florida Statutes)
- FWC Rules Relating To Endangered or Threatened Species (68A-27, Florida Administrative Code)
- Federal Endangered Species Act of 1973 (ESA)

- Federal Marine Mammal Protection Act of 1972

The following species are state- and federally listed as Threatened or Endangered, and may occur in at least one or more of the three planning areas located off of Florida:

- Loggerhead sea turtle (*Caretta caretta*)
- Green sea turtle (*Chelonia mydas*)
- Kemp's ridley sea turtle (*Lepidochelys kempii*)
- Hawksbill sea turtle (*Eretmochelys imbricata*)
- Leatherback sea turtle (*Demochelys coriacea*)
- North Atlantic right whale (*Eubalaena glacialis*)
- Sei whale (*Balaenoptera borealis*)
- Finback whale (*Balaenoptera physalus*)
- Brydes's whale (*Balaenoptera edeni*) [proposed endangered]
- Sperm whale (*Physeter macrocephalus*)
- West Indian manatee (*Trichechus manatus*)
- Gulf sturgeon (*Acipenser oxyrinchus desotoi*)
- Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*)
- Shortnose sturgeon (*Acipenser brevirostrum*)
- Smalltooth sawfish (*Pristis pectinata*)
- Staghorn coral (*Acropora cervicornis*)
- Elkhorn coral (*Acropora palmata*)
- Pillar coral (*Dendrogyra cylindrus*)
- Rough cactus coral (*Mycetophyllia ferox*)
- Lobed star coral (*Orbicella annularis*)
- Mountainous star coral (*Orbicella faveolata*)
- Boulder star coral (*Orbicella franksii*)
- Johnson's seagrass (*Halophila johnsonii*)

Federally designated (or proposed) Critical Habitat is located within at least one of the three planning areas for the following listed species:

- 1) Loggerhead sea turtle
- 2) North Atlantic right whale
- 3) West Indian manatee
- 4) Gulf sturgeon
- 5) Atlantic sturgeon (proposed)
- 6) Smalltooth sawfish
- 7) Staghorn coral
- 8) Elkhorn coral
- 9) Johnson's seagrass

Sea Turtles

The waters of the three planning areas off Florida provide migratory, foraging, and reproductive habitat for five species of sea turtles: loggerhead, green, Kemp's ridley, hawksbill, and leatherback. These species nest on Florida beaches and commonly occur in developmental and in-water foraging habitats or utilize migratory corridors in both state and federal waters along Florida's coasts.

The southeastern U.S. is one of two major nesting sites for loggerheads worldwide, and the green turtle and leatherback nesting populations in Florida are of regional significance. Florida is the

only state in the continental U.S. where leatherback turtles regularly nest. With the exception of a few nests on the Gulf coast, leatherbacks nest almost exclusively on the Atlantic coast of Florida. Florida's green turtle nesting aggregation is the second largest in the Western Hemisphere. While most nesting occurs south of Volusia County on the Atlantic coast of Florida, significant numbers of green turtles also nest north of this county.

Whales

The North Atlantic right whale (NARW) is considered to be one of the most endangered populations of large whales and any mortality or serious injury for this stock is considered to be significant. The small population size and low annual reproductive rate of this species suggest that human-related mortality may have a greater effect relative to population growth rates than for other species (NMFS Stock Assessment Report 2016 available here: https://www.nefsc.noaa.gov/publications/tm/tm241/8_F2016_rightwhale.pdf). The waters of the Southeast U.S. coast, including off Florida and Georgia, are the only known calving areas for North Atlantic right whales and winter habitat for a segment of the population. This includes waters that have been designated as NARW critical habitat by the National Marine Fisheries Service (NMFS). Right whales are present along the southern Georgia and Florida coast from approximately November 15 to April 15. Right whales have also been documented in the GOMPA and SOFPA (NMFS Stock Assessment Report 2016). On average, 19 cow-calf pairs have been documented in the southeastern U.S. during each calving season from 2000-2016.

Humpback whales have been observed in the SAPA, with the highest predicted probability of occurrence off Florida waters during winter months. Sei and finback whales are predicted to occur along the U.S. Atlantic coast, with small but non-zero density estimates off Florida in some months. Sperm whales occur regularly in all three planning areas located off of Florida, with high densities in the GOMPA and SOFPA (NMFS Stock Assessment Report 2016; Roberts et al. 2016 available here: <http://seamap.env.duke.edu/models/Duke-EC-GOM-2015/>). Bryde's whales inhabit a narrow range in the northern Gulf of Mexico (GOM) and NMFS recently issued a proposed rule to list this subspecies as endangered under the ESA. The GOM Bryde's whales are the only year-round resident baleen whale in the northern GOM, and have been sighted in the De Soto Canyon area located south of Santa Rosa Island.

Managed Areas

In addition to Critical Habitat for listed species, there are specific habitats and areas throughout all of the three planning areas that are environmentally sensitive, crucial to marine productivity, and are state and/or federally managed for their conservation value. These habitats and areas have been identified and designated by the FWC, Gulf of Mexico Fishery Management Council (GMFMC), South Atlantic Fishery Management Council (SAFMC), NOAA Fisheries - Highly Migratory Species Management Division (HMS), NOAA - Office of National Marine Sanctuaries, and the National Park Service. These habitats and areas include but are not limited to:

- Essential Fish Habit (EFH) - waters and substrate necessary to fish for spawning, breeding, feeding or growth to maturity.
- Habitat Areas of Particular Concern (HAPC) - subsets of EFH that are rare, particularly susceptible to human-induced degradation, especially ecologically important, or located in an environmentally stressed area (e.g., Steamboat Lumps, Middle Grounds, Tortugas South, Stetson-Miami Terrace, Oculina Bank HAPCs).
- Marine Protected Areas (MPA) - specific areas of the marine environment reserved and managed for the primary purpose of aiding in the recovery of overfished stocks and to

ensure the persistence of healthy fish stocks, fisheries, and associated habitats (e.g., North Florida, East Hump MPAs).

- Special Management Zones (SMZ) – areas where artificial structures or devices have been placed to increase the numbers of fish in an area and/or create fishing opportunities that would not otherwise exist, and are managed to prevent overexploitation of fishery resources.
- Spawning Special Management Zones (Spawning SMZ) – specific areas where fish have been observed spawning (e.g., Warsaw Hole Spawning SMZ).
- The Florida Keys National Marine Sanctuary.
- Gulf Islands National Seashore, Everglades National Park, Dry Tortugas National Park, Biscayne National Park, and Canaveral National Seashore.

Planning Area Usage of the Three Florida Planning Areas

Fisheries

Recreational and commercial fishing that occurs in the three planning areas is a vital part of Florida's economy. There are 2.3 million licensed recreational anglers and 9,400 commercial fishing individuals/operations that fish in Florida annually¹. Saltwater fishing in Florida supports 109,300 jobs annually and has a \$7.6 billion economic impact. The Florida seafood industry supports 92,858 jobs and \$18.3 billion in economic impact (Florida Fish and Wildlife Conservation Commission website <http://www.myfwc.com/about/overview> - accessed 8/9/2017).

Additionally, NOAA suggests that coral reefs in southeast Florida have an asset value of \$8.5 billion, generating \$4.4 billion in local sales, \$2 billion in local income, and 70,400 full- and part-time jobs (NOAA website <https://floridakeys.noaa.gov/corals/economy.html> - accessed 8/9/2017). While the importance of reef and live/hard-bottom habitats on fisheries resources is significant, they also serve an economically important recreational resource as well. Hazen and Sawyer (2001) reported on the use and net economic value of reefs in the southeast Florida area (Palm Beach, Broward, Miami-Dade and Monroe counties). In a twelve-month period, 18.15 million person-days were spent by residents and visitors on natural reefs, with 13.24 million person-days spent snorkeling or scuba diving. The economic contribution of natural reef related expenditures to the area totaled \$2.706 billion (in year 2000 dollars) (Hazen and Sawyer 2001). A similar study for Martin County, Florida, showed that residents and visitors spent 269,000 person-days on natural reefs in 2003. Value of additional output due to reef-related expenditures (Natural Reefs Sales) contributed nearly \$6 million to the county (Hazen and Sawyer 2004).

Other Uses

Marine Aquaculture

Marine aquaculture activities that are currently occurring in all three planning areas off Florida primarily consist of shellfish (e.g., oyster, clams) and live rock. There is a significant national interest from state and federal agencies and legislatures, aquaculture producers, and academics to

¹ These numbers are based on saltwater recreational license holders (age 16+), and unique commercial saltwater product license holders, during fiscal year 2016-2017 (July 1, 2016 – June 30, 2017). Exact numbers are 2,299,956 recreational and 9,383 commercial.

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further develop and streamline both inshore and offshore aquaculture management, permitting, and production for purposes of:

- human food;
- products (e.g., aquaculture/agriculture feed, biomedical);
- alternative energy (e.g., algal-based fuels);
- research;
- stock enhancement;
- restoration for both non-ESA and ESA-listed species; and
- restoration and conservation of aquatic habitat.

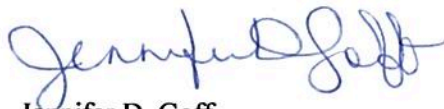
It is imperative that both inshore and offshore aquaculture activities are fully considered for oil and gas planning area use analyses not only based on activities that are currently occurring, but also based on the scope of activities planned by the marine aquaculture industry in these waters.

Restoration

Finally, restoration projects associated with the Deepwater Horizon oil spill recovery are ongoing in the eastern GOM focusing on coastal birds, sea turtles, marine mammals, fisheries and coastal habitats. The potential effects of oil and gas activities on these restoration projects, and additional projects that will be designed and implemented over the next 15 years, should be considered.

We appreciate the opportunity to provide information on this project. If you need any further assistance, please do not hesitate to contact Jane Chabre either by phone at (850) 410-5367 or at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions regarding the content of this letter, please contact Lisa Gregg at (850) 617-9621 or by email at lisa.gregg@myfwc.com.

Sincerely,



Jennifer D. Goff
Land Use Planning Program Administrator
Office of Conservation Planning Services

jdg/lg

ENV 1-3-2

National OCS Oil and Gas Program 2019-2024_33506_081117

cc: Roy Crabtree, NOAA, roy.crabtree@noaa.gov
Margo Schulze-Haugen, NOAA, margo.schulze-haugen@noaa.gov

References

Hazen and Sawyer (2001). *Socioeconomic Study of Reefs in Southeast Florida, Final Report*. Hazen and Sawyer in association with Florida State University and the National Oceanic and Atmospheric Administration. 2001.

Hazen and Sawyer (2004). *Socioeconomic Study of Reefs in Martin County Florida, Final Report*. Hazen and Sawyer in association with Florida State University and the National Oceanic and Atmospheric Administration. 2004.

Florida Department of Environmental Protection

Memorandum

To: Shana Kinsey-Carlsen
Environmental Specialist III
Department of Environmental Protection
3900 Commonwealth Boulevard, MS 47
Tallahassee, Florida 32399-3000

From: Daniel C. Phelps, P.G.
Geological Investigations Section
Florida Geological Survey
Department of Environmental Protection
3000 Commonwealth Boulevard, Suite 1
Tallahassee, FL 32303

Date: August 4, 2017

Subject: Request for Information/Comment: 5-Year National Outer Continental Shelf (OCS) Oil and Gas Leasing Program for 2019-2024

This memorandum is being provided in response to a request for information from the Bureau of Ocean Energy Management regarding the new five-year OCS program (2019-2024). There were eight identified topical items for which information and comments were requested. However, the Florida Geological Survey can only comment on three of the topics as they relate to our area of expertise. Those topics are:

- Geographical, geological and ecological characteristics of the planning areas of the OCS and nearshore and coastal environments.
- Other uses of the areas including fisheries, navigation, military, sea lanes, potential sites of deep water ports, potential alternative energy (wind or wave) sites, and other uses of OCS resources.
- Environmental sensitivity and marine productivity of the planning areas.

Geographical, geological and ecological characteristics of the planning areas of the OCS and nearshore and coastal environments:

Infilled sinkholes occur on the OCS off the northeast and central east coast of Florida. These features typically exhibit little or no bathymetric expression. It is conceivable that exploratory and/or production wells, test borings or the placement of bottom supported structures proximal to these features could result in the activation of artesian flow to the seabed from the Floridan aquifer system. Such features may also represent geohazards to the stability of bottom supported and bottom involved structures and installations.

Submarine springs are known to exist off both the east and west coast of Florida. However, the extent and number of these features is currently unknown due to a lack of data. Some springs exhibit dynamic flow and probably respond to tidal cycles as they both take water and discharge water depending on the tidal cycle. These features could potentially provide a pathway for contaminants to enter the Floridan aquifer system should there be a release of petroleum. We recommend, in areas along the OCS in areas where known karst features exist, that any exploratory operations take the appropriate precaution to both identify and protect these features.

Accumulations of gas hydrates occur within the near seafloor sediments on the OCS along the coast of Florida. These accumulations of shallow gas hydrates present the potential risk of localized massive gas releases should they be disturbed by the placement on the seafloor of installations with substantive sub-seabed impacts or if they are intersected by well bores. While that risk is assumed to be negligible, there are potential impacts of such a release on natural resources proximal to it.

It is requested that, in the leasing program stipulations, the Florida Geological Survey (FGS) be given access to all non-proprietary geological, geochemical and geophysical data. This would include bottom samples, borings and stratigraphic test information as well as sub-bottom profiler, side scan sonar, swath bathymetry, and traditional bathymetric survey data collected proximal to the coast of Florida. While the FGS has a general interest in geologic data, our use of these data, beyond enhancing our understanding of the geology of Florida, would be to add to and enhance both the Reconnaissance Offshore Sand Search Inventory (ROSSI) database <http://rossi.urs-tally.com/> and the FGS's database <https://softlive.dep.state.fl.us/fgs/data-maps>.

Sub-bottom profiler, side scan sonar and swath bathymetry data collected prior to the placement of any proposed offshore installations off the coast of Florida which might serve to delineate areas of live bottom and hard ground, as well as potential accumulations of beach restoration quality sand resources off the coast of Florida, are of value. Any data that would help define the lateral and vertical extent of such accumulations would be of interest. While the 100-foot bathymetric contour is considered the present practical limit of dredging for beach restoration quality sand, given need, such limitations may change in the future.

Data that facilitates the understanding of the hydrogeology of Florida are also of interest to the FGS. Data that facilitates investigations of infilled karstic collapse features so that they might be avoided as potential geohazards to bottom supported or bottom involved installations are of particular interest.

Other uses of the areas including fisheries, navigation, military, sea lanes, potential sites of deep water ports, potential alternative energy (wind, ocean current or wave) sites, and other uses of OCS resources:

Potential resource conflicts associated with the possible sequestration of beach restoration quality sand underlying or near structures installed for the extraction and

conveyance of oil and gas, may occur. To further explain the criticality of these potential conflicts, consider the following:

- Beach erosion is of constant concern in Florida.
- Shore protection options, in various portions of the state, are limited by extensively urbanized coastal areas with substantial commercial and residential development proximal to the beach which make asset relocation or abandonment difficult.
- The shore protection measure of choice is the periodic placement of sand along the beach.
- As coastal development in the State of Florida proceeds and readily available onshore sources of suitable borrow material become depleted or uneconomical, offshore sand bodies are increasingly sought after as sources of beach restoration-quality sand.

Sites where wind and ocean current energy could be exploited exist offshore of the coast of Florida. The potential for exploitation of ocean current energy, offshore of the southeast coast of Florida, would be located where the Gulf Stream flows.

The environmental sensitivity and marine productivity of the planning areas:

Florida's extensive coastline is home to a diversity of environments. These include mud banks and sea grass flats within Florida Bay, marshes, mangroves and almost pure silica sand, mixed silica and shell sand, and carbonate sand beaches, as well as eroding bluffs and both exposed and sheltered tidal flats. Florida's offshore resources include environmentally sensitive coral reefs offshore of both southern and southeastern Florida, hard grounds, hard bottoms and submerged karstic features.

The Ixtoc and Deepwater Horizon/BP spills in the Gulf of Mexico serve as historical references regarding potential impacts to coastal environments from petroleum releases. Should similar events occur in the portion of the South Atlantic Planning area offshore of the northeast and central east coast of Florida currents would likely spread such a spill or spills widely along the Florida east coast. If such a spill or spills were to occur in the Florida Straits the action of the Gulf Stream would most likely widely disburse the spill or spills northeastward. The result would spread the impact over a broad area of coral reefs and coast line, potentially from the Dry Tortugas and Keys of Monroe County north through the beaches of Miami/Dade, Broward, Palm Beach, Martin, St. Lucie, Indian River and Brevard counties. Ultimately, in either case, the deleterious effects of such a spill or spills would likely negatively impact both the environment and economy of the entire east coast of Florida. Were such a spill or spills to occur within the Eastern Gulf of Mexico Planning Area, dispersal patterns might put the natural resources of the Panhandle and west coasts of Florida at risk.

From: Michael Busha
To: [Kinsey, Shana](#)
Cc: [Stephanie Heidt](#)
Subject: RE: SAI # FL FL201707078057 - Request for Information on new 5-year National OCS Oil and Gas Leasing Program for 2019-2024
Date: Thursday, August 03, 2017 12:45:09 PM
Attachments: [image005.png](#)
[Request_OSC_2019-2024_Program.pdf](#)

Council staff has conducted a preliminary review of the proposed program. Attached please find the draft comments. Final comments as approved by the Regional Planning Council will be made available to you after the next scheduled meeting of the Council Board on September 15, 2017.

Michael J. Busha, AICP
Executive Director
Treasure Coast Regional Planning Council
421 SW Camden Avenue
Stuart, FL 34994
772.221.4060
mbusha@tcrpc.org

From: Kinsey, Shana [mailto:Shana.Kinsey@dep.state.fl.us]
Sent: Friday, July 07, 2017 2:28 PM
To: Johnson, John S.; Woodward, Deena S.; 'timothy.parsons@dos.myflorida.com'; conservationplanningservices@myfwc.com; jennifer.goff@myfwc.com; Gregg, Lisa; Phelps, Dan; Taylor, David M.; martin.markovich@dot.state.fl.us; KAL.KNICKERBOCKER@FRESHFROMFLORIDA.COM; Dow, Roxane; Lazar, Ann; Harper, Jennifer; Shirley, Michael; Laakkonen, Keith; Walczak, Joanna; julia.espy@laspbs.state.fl.us; ron@rlbookpa.com; dimbler@theapc.com; austin.mount@wfrpc.org; CRietow@theapc.com; koons@ncfrpc.org; hharling@ecfrpc.org; mwuerstle@swfrpc.org; bteeple@nefrc.org; sean@tbrpc.org; isabelc@sfrpc.com; Michael Busha; Judy.Jamison@att.net; gfbeatty@yahoo.com; Havens,Karl; shenson@co.okaloosa.fl.us; 'tforsgren@ccaflorida.org'; fishawk@aol.com; cpattison@1000fof.org; jwraithmell@audubon.org; chlee2@earthlink.net; rogerb@santarosa.fl.gov; billhogarth@usf.edu; DCPPermits@deo.myflorida.com; Hamilton, Shawn; Strong, Greg; Prather, Jeff; Yeargan, Mary; Smith, Jennifer K.; Iglehart, Jon; kwilkins@myescambia.com; pgchunn@myescambia.com; alanp@fairpoint.net; info@environmentflorida.org; eaeddy@gulfbreeze.fl.gov; shenson@co.okaloosa.fl.us; philipkramer@fio.usf.edu; jared.williams@laspbs.state.fl.us
Cc: terri.stoutamire@deo.myflorida.com; Prado, Rebecca; Stahl, Chris
Subject: SAI # FL FL201707078057 - Request for Information on new 5-year National OCS Oil and Gas Leasing Program for 2019-2024
Importance: High

Memorandum

TO: State Agencies and Interested Parties
FROM: Shana Kinsey-Carlson
SUBJECT: Request for Information/Comment: 5-Year National OCS Oil and Gas Leasing Program for 2019-2024
DATE: July 7, 2017
SAI #: FL201707078057

The U.S. Department of the Interior, Bureau of Ocean Energy Management (BOEM) is requesting information/comment as the first step in the preparation of a new five-year program National Outer Continental Shelf (OCS) Oil and Gas Leasing Program (National OCS Program) for 2019-2024. Upon completion, the new National OCS Program will replace the National OCS Program for 2017-2022, which was approved on January 17, 2017. A copy of the Federal Register Notice request is attached.

The OCS Lands Act requires that a 5-Year National OCS Program be based on a comparative analysis of all oil and gas bearing regions. Therefore, the BOEM is soliciting information and comment concerning all 26 OCS planning areas of the OCS, including those currently under congressional moratoria or withdrawn from leasing. The three planning areas located offshore Florida (see map) are:

- the eastern Gulf of Mexico (most under congressional moratoria until June 30, 2022);
- the Straits of Florida; and
- a portion of the South Atlantic.

The notice provides the opportunity for all parties to provide suggestions and information that should be considered in the development of the program. Pursuant to the OCS Lands Act, information concerning the following has been requested:

1. National energy needs for the period 2019-2024 and the role of the OCS as part of a comprehensive national energy policy.
2. Geographical, geological and ecological characteristics of the planning areas of the OCS and nearshore and coastal environments.
3. Equitable sharing of developmental benefits and environmental risks among the planning areas.
4. Other uses of the areas including fisheries, navigation, military, sealanes, potential sites of deepwater ports, potential alternative energy (wind or wave) sites, and other uses of OCS resources.
5. Environmental sensitivity and marine productivity of the planning areas.
6. Environmental and predictive information regarding offshore and coastal areas potentially affected by OCS development (e.g. socio-cultural and archaeological).
7. Methods and procedures for assuring fair market value for lands leased.
8. Location of planning areas with respect to, and relative needs of regional and national energy markets.

Comments should be addressed to the mailing or email address referenced herein and should be received in our office by **August 4, 2017**. If you have any questions, please contact me at 850-245-2185 or Shana.Kinsey@dep.state.fl.us. Thank you for your assistance.

Shana

Shana Kinsey-Carlson
Florida Department of Environmental Protection
Florida Coastal Office
shana.kinsey@dep.state.fl.us
Office: 850.245.2185

TREASURE COAST REGIONAL PLANNING COUNCIL
INTERGOVERNMENTAL COORDINATION AND REVIEW LOG

TCRPC Number: 17-FL-07-01

SAI #FL201707078057

Applicant: U.S. Department of Interior

Project Description: Request for Information/Comment 5-Year Outer Continental Shelf Oil and Gas Leasing Program

The U.S. Department of the Interior, Bureau of Ocean Energy Management (BOEM) is requesting information and comments on the preparation of a new 5-year National Outer Continental Shelf (OCS) Oil and Gas Leasing Program for 2019-2024. The proposed program is intended to replace the 2017-2022 program which was approved on January 17, 2017.

The OCS Lands Act requires that a 5-Year OCS Program be based on a comparative analysis of all oil and gas bearing regions. Therefore, the BOEM is soliciting information and comments concerning all planning areas of the OCS, including those currently under congressional moratoria or withdrawn from leasing. This does not mean that a lease sale(s) will be scheduled or held in these areas. The three planning areas located offshore of Florida (see attached map) are:

- the eastern Gulf of Mexico (most under congressional moratoria until June 30, 2022);
- the Straits of Florida (not included in the current program); and
- a portion of the South Atlantic.

The request provides the opportunity for all parties to provide suggestions and information that should be considered in the development of the new program. Pursuant to the OCS Lands Act, information concerning the following has been requested:

1. National energy needs for the period relevant to the new National OCS Program (*i.e.*, 2019 to 2024), in particular, the role of OCS oil and gas leasing and resulting exploration, development and production activities in achieving national energy policy goals; the economic, social, and environmental values of the renewable and nonrenewable resources contained in the OCS; and the potential impact of oil and gas exploration and development on other OCS resource values and the marine, coastal, and human environments;
2. Existing information concerning geographical, geological, and ecological characteristics of the OCS planning areas, and near shore and coastal environments;
3. Equitable sharing of developmental benefits and environmental risks among the various planning areas;
4. Location of planning areas with respect to, and the relative needs of, regional and national energy markets;

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Subject to Modifications

5. Other uses of the sea and seabed, including commercial and recreational fisheries; navigation; military activities; existing or proposed sea lanes; potential sites of deepwater ports (including liquefied natural gas facilities); subsea cables; satellite launch activities; potential offshore wind, wave, current, or other alternative energy sites; and other anticipated uses of OCS resources and locations;
6. Relative environmental sensitivity and marine productivity of the different planning areas and/or a specific section(s) of a given OCS planning area;
7. Environmental and predictive information pertaining to offshore and coastal areas potentially affected by OCS oil and gas development including, but not limited to, socio-cultural and archaeological information; and
8. Methods and procedures for assuring the receipt of fair market value for lands leased.

A key aspect of implementing President Donald J. Trump's America-First Offshore Energy Strategy is the initiation of a new National OCS Program development process, outlined in Executive Order (E.O.) 13795 of April 28, 2017; and Secretary Order 3350 of May 1, 2017, issued by Secretary of the U.S. Department of the Interior (DOI) Ryan K. Zinke. Section 2 of E.O. 13795 states that it is United States policy to encourage energy exploration and production, including on the OCS, to maintain the nation's global energy leadership and "foster energy security and resilience for the benefit of the American people, while ensuring that any such activity is safe and environmentally responsible." Secretary Order 3350 calls for enhancing opportunities for energy exploration, leasing, and development of the OCS, establishing regulatory certainty for OCS activities, and enhancing conservation stewardship, thereby providing jobs, energy security, and revenue for the American people. As required by E.O. 13795, DOI will cooperate, as appropriate and consistent with applicable law, with the departments of Defense and Commerce.

Data suggests that portions of the Atlantic OCS may contain significant oil and gas resource potential; however, current geological and geophysical (G&G) information is based on data collected in the 1970s and early 1980s. Tremendous advances in instrumentation and technology for the acquisition and analysis of G&G data have been made in the intervening decades. In recognition of these advances in G&G data acquisition technology and the need to better understand the scope of existing resources, on July 23, 2014 BOEM published a Record of Decision for the Programmatic Environmental Impact Statement for Atlantic G&G activities, which established a path forward for G&G activities off the Mid- and South Atlantic coast. BOEM is currently evaluating several G&G permit applications. With the initiation of a new program development process and the renewed potential for a lease sale in the Atlantic region, BOEM may receive new G&G permit applications in the near future.

Funding Agency: N/A

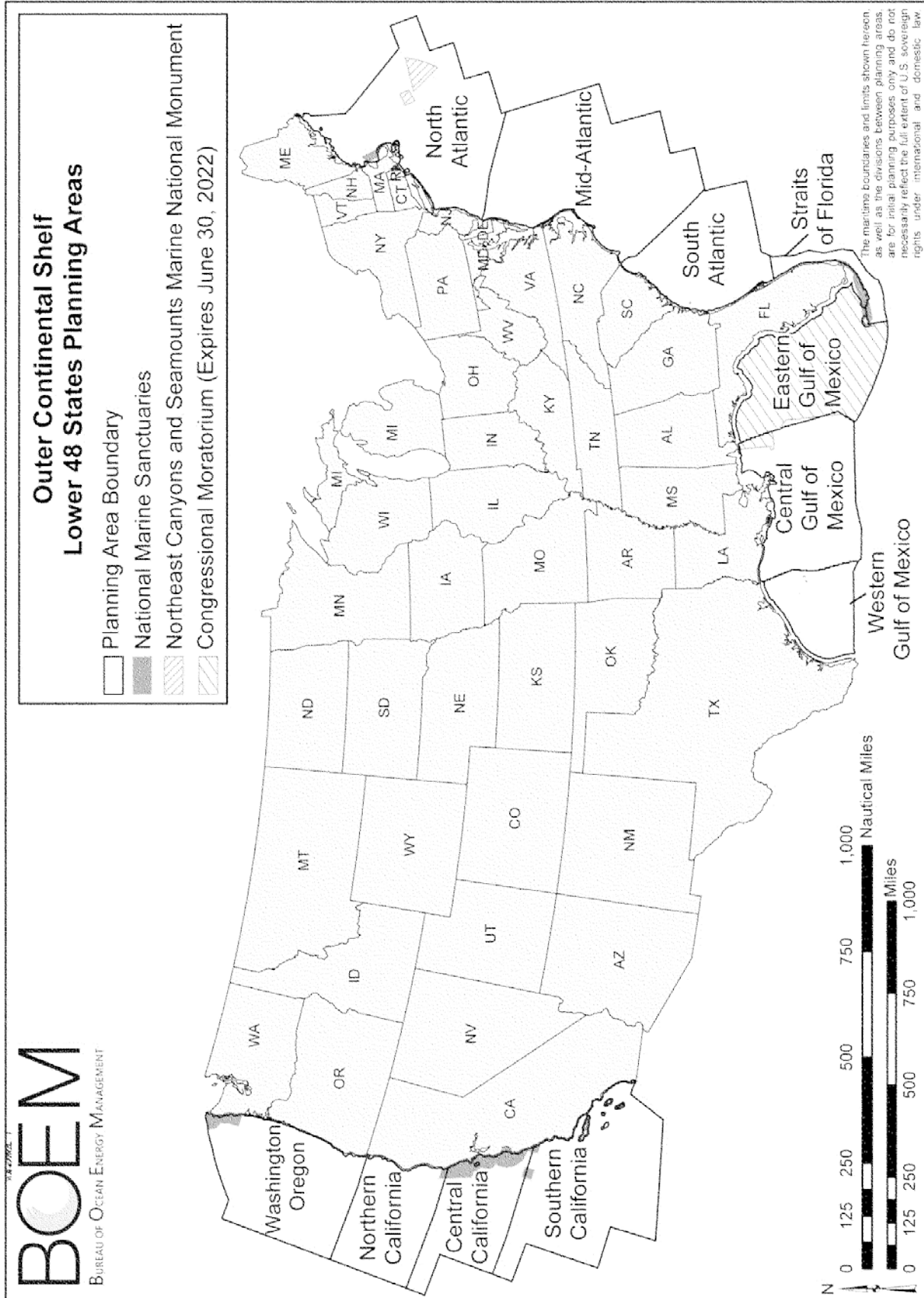
Estimated Funding: N/A

Recommendations: If testing should lead to OCS oil and gas leasing and drilling in the South Atlantic, Eastern Gulf of Mexico, and the Florida Straits planning areas such actions would be inconsistent with Strategic Regional Policy Plan Strategy 9.1.1: Reduce the Region's reliance on fossil fuels. Among other concerns, Council is concerned with the effects of offshore oil and gas exploration on the State's ocean and estuarine water quality. Specifically, Florida's major economic engine, the tourism industry, relies on clean waters and healthy beaches. The potential risk of oil spills, fires, and air pollution off Florida's coasts creates uncertainty in the future viability of this industry. Previous accidents in the Gulf of Mexico have demonstrated the devastating effect on tourism from these events. The proposed project is also in conflict with Strategy 3.3.1: Maintain and improve existing features which are attributes to the attraction of tourists. Furthermore, the proposed project is in conflict with Regional Goal 6.4: Protection of beachfront and environmentally sensitive coastal and marine resources; and Regional Goal 6.5: Protection of estuarine resources.

As an alternative to new offshore drilling projects, offshore wind energy and ocean current energy projects are needed to increase the proportion of electricity produced from renewable resources. The use of these renewable resources is preferred over the traditional burning of fossil fuels because they do not result in greenhouse gas emissions nor do they create the risk of accidents such as oil spills. The prospect of sea level rise is of particular concern to the State of Florida because of its expansive coastline; low elevations and flat topography; shallow coastal wellfields; economic dependence of the tourism industry on beaches and coastal resources; and significant public and private investment in coastal areas. A continued effort to develop and commercially produce renewable energy in the State is a more sustainable strategy for the future welfare of the region.

Included as part of this report are comments received from Martin County as part of the BOEM's request for information.

Agencies Contacted: All Indian River County Local Governments
All Martin County Local Governments
All St. Lucie County Local Governments
All Palm Beach County Local Governments





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Commissioner, District 1

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July 26, 2017

Ms. Kelly Hammerle
National Program Manager, BOEM
45600 Woodland Road
Mailstop VAM-LD
Sterling, VA 20166

Re: Request for Information and Comments on the Preparation of the
2019-2024 National Outer Continental Shelf Oil and Gas Leasing
Program MAA 104000

Dear Ms. Hammerle:

Thank you for the opportunity to comment on the preparation of the 2019-2024 National Outer Continental Shelf Oil and Gas Leasing Program. On behalf of the Martin County Board of County Commissioners, I am writing in strong opposition to any expansion of offshore drilling. Martin County is located on the Treasure Coast of Southeast Florida, immediately north of Palm Beach County, and has a population of just over 153,000. I cannot overstate our concern with the impacts of oil and gas drilling on the ecosystem, tourism industry and economy of our community.

Martin County's economy depends on the health of our waterways and our natural ecosystem. Like many coastal communities, our way of life is tied directly to our waterways. The St. Lucie Federal Navigation Inlet provides a conduit between the Atlantic Ocean and the Indian River Lagoon, which is the most biodiverse estuary in North America, as well as a lagoon of national significance. This ecosystem provides habitat for over 4,300 species of plants and animals, including more than 30 threatened or endangered species such as manatee, wood stork, sand hill crane, and peregrine falcon.

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The offshore waters also contain coral reefs, which are at the northern end of the Florida Reef tract. These coral reefs provide vital ecosystem services to a valuable and thriving fishery. The fishery serves as the economic basis for our commercial, sport and recreational fishing industry.

We are extremely concerned about the potential of drilling off the shores of Martin County and across the state of Florida. Despite taking place hundreds of miles away, the Deepwater Horizon disaster impacted Martin County's tourism industry. We cannot support any actions that may bring that danger closer to our shores. The tourism industry is key to Florida. The state welcomed over 112 million visitors in 2016, bringing \$109 billion into the Florida economy.

Our waterways are environmentally sensitive and already faced with significant threats, including impaired water quality from excessive nutrients, extreme freshwater inflows, and invasive species. Surface waters of the northeast Everglades naturally flowed south to the Everglades, west to Lake Okeechobee and east to the Indian River Lagoon. Projects constructed in the 1950's diverted surface waters into canals and into the St. Lucie Estuary and the Indian River Lagoon. As a result, billions of gallons of freshwater are wasted daily to the Atlantic Ocean. During large surface water discharge events, the water quality of the lagoon and surrounding estuary are severely impacted, harming aquatic plants and animals, and requiring restriction for human contact. Martin County is vigilant in our desire to improve our waterways. We have strong environmental regulations and have partnered with the federal and state government as a leader in restoration and conservation. Martin County has acquired over 45,000 acres for various Comprehensive Everglades Restoration (CERP) projects. Since 2000, Martin County has invested over \$50 million in stormwater projects and has restored 28 acres of oyster habitat in the St. Lucie Estuary. Martin County is invested in continued improvements and cannot support any activities that could degrade our natural environment or undermine the federal government's investment in improving our waterways.

The Martin County Board of County Commissioner is opposed to all oil and gas exploration off the Atlantic Coast of Florida. Thank you again for the opportunity to provide comments on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Smith', with a stylized flourish extending to the right.

Doug Smith

Chairman

Martin County Board of County Commissioners

cc: Governor Rick Scott