

January, 2018

Ms. Kelly Hammerle
Chief, National Oil and Gas Leasing Program
Development and Coordination Branch
Leasing Division, Office of Strategic Resources
Bureau of Ocean Energy Management (VAM-LD)
45600 Woodland Road
Sterling, VA 20166

Re: Comments on the Bureau of Ocean Energy Management 2019-2024 Draft Proposed National Oil and Gas Leasing Program, Docket ID: BOEM-2017-0074

Dear Ms. Hammerle:

On behalf of the Pinellas County Board of County Commissioners, I write in strong opposition to the Bureau of Ocean Energy Management's (BOEM) 2019-2024 Draft Proposed National Oil and Gas Leasing Program, and particularly in opposition to the plan to offer two leasing sales in the Eastern Gulf of Mexico. The Eastern Gulf of Mexico is currently under a leasing moratorium for oil and gas development through 2022 and we support making that moratorium permanent. Pinellas County is a peninsula on the central Gulf Coast of Florida with a population of just under 1 million, and our geography makes us dependent on the health of our waterways. The Board of County Commissioners has consistently opposed the expansion of offshore drilling in the Eastern Gulf of Mexico and adopted a resolution in opposition of proposed oil development leasing in Florida waters over a decade ago.

Pinellas County's tourism industry, as well as its recreational and commercial fishing industry, is dependent on the quality of our coastal environment, with Pinellas County's beaches frequently listed among the best in the world. 71.7 percent of Pinellas' overnight visitors are drawn to the area by our pristine beaches. These visitors have a total economic impact of over \$4.5 billion and directly support 47,000 jobs. Pinellas County households pay \$361 less in state and local taxes each year due to the positive economic impact of those visiting our beaches. A 2014 Economic Valuation of Tampa Bay Study by the Tampa Bay Regional Planning Council and the Tampa Bay Estuary Program (TBEP) found that, beyond tourism, one in five jobs in the Tampa Bay area are dependent on a healthy Bay.

The County remains opposed to drilling in the Gulf of Mexico as a whole due to our experience with the Deepwater Horizon Oil Spill in 2010, and a more localized tanker spill that directly affected our beaches, economy and wildlife in 1993. Given the known circulation pattern in the Gulf of Mexico, oil released into Gulf water, particularly the eastern Gulf, can easily travel several hundred miles under the loop current and be deposited on Pinellas County's shoreline. The University of South Florida has undertaken several research projects in the aftermath of the Deepwater Horizon oil spill and is still working to fully understand the extent of the long-term detrimental impacts of the spill on the Gulf of Mexico's ecosystem.

In addition, the effects of spills and even routine drilling operations have a negative impact on live bottom communities, marine animals, and coastal habitats. Chronic exposure to oil and other residues related to oil and gas drilling can negatively impact the life cycle and food chain of and for commercial and recreational fish. Our local waters are designated as Outstanding Florida Waters and are part of the TBEP and specifically afforded special protection status. Recently, the efforts of local governments, TBEP, and community partners have led to significant achievements in the restoration of seagrass in the area,

restoring the levels to what they were in the 1950's. About 70 percent of the fish caught recreationally or commercially in Florida spend part of their lives in the seagrasses. Protecting the water quality and undersea environment of the Gulf of Mexico and adjacent waterways is critical to the commercial and recreational fishing industry. Pinellas County is home to the second highest number of vessel registrations in Florida. The Florida Fish and Wildlife Conservation Commission reports that in 2017 alone, nearly 5 million pounds of food and bait were caught off the shores of Pinellas County, with an estimated value of nearly \$15 million. In total, the commercial and recreational fisheries in West Florida have an economic impact of \$11.3 billion per year.

Meanwhile, in 2014, United States Fish and Wildlife Service listed the Red Knot bird as a threatened species and Pinellas County is an important habitat for it. Our coastal waters are home to the endangered Loggerhead sea turtle. The County already monitors the impact of any coastal project on several threatened species such as sea turtles and the Red Knot, and it is essential that any offshore drilling activities consider the potential negative impacts to the habitat and health of these species as well.

In addition to the economic and environmental impacts, drilling in the Eastern Gulf of Mexico would negatively impact the nation's defense capabilities due to impacts on flight training and testing from the numerous bases in the Panhandle, MacDill Air Force Base here in Tampa Bay, and Naval Air Station Key West, which require unrestricted access to the Eastern Gulf of Mexico.

The Pinellas County Board of County Commissioners is strongly opposed to all oil and gas exploration in the Eastern Gulf of Mexico and urges you to eliminate the two proposed leases in your next draft of the program. In addition we would ask that you to reconsider expanding oil and gas exploration in the entire Gulf of Mexico. Thank you again for the opportunity to provide comments on this important issue.

Sincerely,

Kenneth T. Welch, Chairman
Pinellas Board of County Commissioners

Attachments: Pinellas County Resolution

Cc: Governor Rick Scott
Pinellas County Federal Legislative Delegation
Pinellas County State Legislative Delegation