



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

October 17, 2014

Mr. Paul Scholz, Acting Director
NOAA Office of Ocean and Coastal Resource Management
NOAA National Ocean Service
1305 East West Hwy., Room 11321
Silver Spring, Maryland 20910-3281

Re: Unlisted Activity Review request – Supplemental information regarding BOEM permits for Mid- and South-Atlantic Geological and Geophysical Survey activities

Dear Mr. Scholz;

The SC Department of Health and Environmental Control's Division of Ocean and Coastal Resource Management (SCDHEC) in coordination with the South Carolina Department of Natural Resources (SCDNR) offer the attached supplemental information to further support our Unlisted Activity Request (UAR) dated August 25, 2014.

It is our belief the attached information bolsters our request to review seven of the nine permit applications for consistency with the enforceable policies contained within the South Carolina Coastal Zone Management Program (SCCZMP) for Geological and Geophysical (G&G) surveys in Federal waters off the coast of South Carolina. We continue to assert there are reasonably foreseeable coastal effects to South Carolina's coastal resources and uses from the proposed activities and request to review of the permit applications referenced in our August 25, 2014 letter.

Please contact me at the addresses below should you have any questions.

Sincerely,

Rheta G. DiNovo, Director
Regulatory Division

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cc: Catherine Templeton, SCDHEC
Elizabeth Dieck, SCDHEC
Bob Perry, SCDNR
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South Carolina Department of Natural Resources



Alvin A. Taylor
Director
Robert H. Boyles
Deputy Director for
Marine Resources

Memorandum

To: Curtis Joyner, SCDHEC/OCRM
From: Wallace Jenkins, Marine Biologist IV, Office of Fisheries Management
Subject: Supporting information for review of proposed survey work
Date: October 15, 2014

Thanks for contacting us to gather supporting information on the importance of your agency being allowed to review permit requests related to gas and oil surveys off the SC coast. It is incumbent upon us in the state government's regulatory community to provide input on these proposed activities especially as they relate those projected to occur in our coastal zone and adjacent federal waters.

The importance of our fishery resources to the state cannot be ignored during these deliberations. For example, in 2012 the total ex-vessel value of commercial seafood products landed in SC exceeded \$24 million (George Steele, SCDNR Fisheries Statistics Section, personal communication 2014). When multiplier effects are added, this impact rises to \$69 million with nearly \$30 million in labor income generated (Rhodes, 2013). Although significant, these numbers pale in comparison to the impact of the 481,000 licensed saltwater recreational anglers (Boyd Braxton, SCDNR IT Section, personal communication 2014) who fish in SC state and adjacent federal waters. For example, in 2011 recreational saltwater fishermen spent \$268 million on retail sales, alone. This generated a total impact of over \$413 million and supported 10,615 jobs in our state (American Sportfishing Association, 2013). Thus research and management within the SCDNR is aimed largely at understanding life histories and the impacts of nature and anthropogenic changes these important marine resources. A major goal of the agency is to proactively manage the state's marine resources and habitats for sustainable use, while enhancing the status and quality of those resources. Thus, as stated above, it is incumbent upon state managers to review and comment on all proposed actions in SC nearshore and offshore waters that may potentially affect the status of the various fisheries or restrict public access to the valuable fishing grounds.

As a further example of the investment in these resources, 50 artificial reef sites have been permitted off the coast of SC. In 2006, it was estimated that these structures generated a total economic impact of over \$83 million while supporting approximately 1,000 jobs. A survey of SC saltwater recreational license holders found that 32% of active saltwater anglers' fish on the state's permitted reef sites. Over the past 15 years, 277 deployments have expanded the amount of fishable bottom on these sites by 21.5 million cubic feet. Request to conduct gas and oil surveys within or adjacent to these permitted areas would need to be examined closely and conditioned in a way to prevent adverse effects to the biota and preserve access by constituents.

Our state's interests do not end with commercial and recreationally exploitable resources. We are also stewards of nongame species and all endangered and threatened wildlife. For example, SCDNR's Marine Turtle Conservation Program is responsible for managing and protecting sea turtles in the state. This program has several all encompassing components: management, monitoring, research, and education. More specifically this program provides technical expertise on anthropogenic activities that have the potential to impact sea turtles (i.e., beach renourishment, dredging, oil and gas surveys and subsequent exploration), and locates and protects sea turtle nests on the approximately 300 km of coastline. These beaches provide nesting habitat for a number of species of sea turtles including: loggerheads; green; leatherbacks; and Kemp's ridley. In addition, these species have been observed mating in state and adjacent federal waters. By far the most common are the loggerheads which are listed as threatened and are genetically distinct from those in Florida. In 2011 loggerheads worldwide were reclassified into several distinct population segments (DPS) based on genetics, tagging, satellite telemetry, demographics, and oceanographic features. Within the Northwest Atlantic DPS - five recovery units were identified. Loggerhead turtles nesting in VA, NC, SC and GA are part of the Northern Recovery Unit. Each recovery unit is a separate breeding population and can't be replaced by turtles from other recovery units. Thus, a loss within a recovery unit would represent a significant loss of genetic diversity. During the 2013 nesting season, there were a minimum of 5,194 nests in SC. While not on the same order of magnitude as abundance of loggerhead nests in Florida's Brevard county it is more than twice the number observed in our neighboring states of NC and GA where 2,282 and 1,249 loggerhead nests were reported, respectively. This means that roughly 65% of the nests in the Northern Recovery Unit occur in SC, with over a third of those found on a small part of the coast comprising the Cape Romain National Wildlife Refuge (NWR). Within the refuge, 1,916 nests were found in 2013. As a result, it is very likely that large numbers of sea turtles from the Northern Recovery Unit would be present in nearshore waters of refuge during the nesting season from May 1 to October 31. Adult females have a tendency to linger near the nesting beaches before and between nesting events, resting under rocky ledges and outcrops in inner shelf waters for periods of weeks. Depending on factors including the distance from shore of oil and gas surveys, breeding adults, nesting adult females, and hatchlings could be exposed to and affected by the survey activities.

Thanks for giving us the opportunity to provide this supporting information for the importance of SC regulators being granted the ability to comment and perhaps provide input on permit conditions going forward. If there is anything further we can provide, please feel free to contact us.