

**Gray's Reef National Marine  
Sanctuary Advisory Council**

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March 2, 2018

Ms. Kelly Hammerle, Manager  
National OCS Oil and Gas Leasing Program  
Bureau of Ocean Energy Management (VAM-LD)  
45600 Woodland Road  
Sterling, VA 20166-9216

Dear Ms. Hammerle:

I am writing to you on behalf of the Gray's Reef National Marine Sanctuary Advisory Council in response to the call for public comments on the Five-Year Outer Continental Shelf (OCS) Draft Proposed Program (DPP) for 2019 to 2024, as now proposed by the Bureau of Ocean Energy Management (BOEM) and referenced in Federal Register Volume 83, Number 5 (Monday, January 8, 2018) Notices, Pages 829-834, FR Doc No: 2018-00083. The Gray's Reef National Marine Sanctuary Advisory Council is a 19-member community-based advisory group consisting of representatives from various user groups, government agencies and the public at large, whose purpose is to provide advice and guidance to Gray's Reef National Marine Sanctuary and to NOAA's Office of National Marine Sanctuaries. This letter constitutes the Gray's Reef National Marine Sanctuary Advisory Council's comments on the Draft Proposed Program.

Our National Marine Sanctuaries protect natural and cultural features of U.S. waters, while allowing people to use and enjoy the ocean in a responsible and sustainable manner. Gray's Reef National Marine Sanctuary is located 19 miles off the Georgia coast. The Sanctuary provides habitat for an abundance of marine life (including many economically-important fish species). Loggerhead sea turtle, a threatened species, forage and rest year-round at Gray's Reef National Marine Sanctuary. The Sanctuary also rests within the critical habitat and only known calving ground of the highly-endangered North Atlantic Right Whale. This 22-square-mile sanctuary is the only protected natural reef in the Atlantic Ocean between Cape Hatteras, North Carolina and Cape Canaveral, Florida.

Although national marine sanctuary regulations prohibit oil and gas development within the Sanctuary, we are seriously concerned by the potential for issuance of leases and the potential development that could occur "upstream" and in the waters directly surrounding

Gray's Reef National Marine Sanctuary. Given the pattern of ocean currents that produce gyre-like features within and around the Sanctuary, and given the fragile nature of this unique marine habitat, oil and gas activities outside the boundaries could have a significant impact on Gray's Reef National Marine Sanctuary. As such, the Gray's Reef National Marine Sanctuary Advisory Council does not support the Draft Proposed Program as currently proposed. Additionally, the Sanctuary Advisory Council requests additional public meetings be held in coastal communities, such as those nearer Gray's Reef National Marine Sanctuary, where these potential developments are most likely to result in impacts.

Gray's Reef National Marine Sanctuary Advisory Council would like to refer BOEM to relevant scientific information about the resources at Gray's Reef National Marine Sanctuary developed by NOAA that may complement BOEM's efforts to develop a thorough Draft Environmental Impact Statement. The Final Environmental Impact Statements for the designation of the sanctuary ([https://graysreef.noaa.gov/management/mgmtplan/pdfs/grnms\\_feis\\_1980.pdf](https://graysreef.noaa.gov/management/mgmtplan/pdfs/grnms_feis_1980.pdf)) and the creation of the research area (<https://nmsgraysreef.blob.core.windows.net/graysreef-prod/media/archive/management/research/pdfs/grnmsresearchareafeis.pdf>) provide documentation about an area's affected environment including marine ecosystems and human uses. In addition, NOAA's Environmental Sensitivity Index (ESI) maps (<http://response.restoration.noaa.gov/maps-and-spatial-data/download-esi-maps-and-gis-data.html>) provide summaries for at-risk coastal resources, including Gray's Reef National Marine Sanctuary.

Respectfully submitted,



Michael D. Denmark, Chair  
Gray's Reef National Marine Sanctuary Advisory Council

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*The opinions expressed in this letter do not reflect the views of Federal agencies represented on the sanctuary advisory council. Additionally, the council is an advisory body to the sanctuary superintendent, and as such the opinions and findings of this letter do not necessarily reflect the position of the sanctuary and the National Oceanic and Atmospheric Administration.*