April 26, 2012

Mr. Gary D. Goeke
Chief, Regional Assessment Section
Office of Environment (MS 5410)
Bureau of Ocean Energy Management
Gulf of Mexico OCS Region
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123-2394

Comments on Draft Programmatic Environmental Impact Statement (PEIS)
Atlantic Geological and Geophysical (G&G) Activities
Public Hearing: Wilmington, Delaware

Dear Mr. Goeke,

The Delaware Chapter of the Sierra Club opposes high intensity seismic testing of the Atlantic Continental shelf for oil and gas exploration. This action would place the nation as a whole, the State of Delaware, and the ocean's aquatic biodiversity at risk; a risk that we assert is too dangerous for us to take.

We are at a crossroads in our nation's energy policy, with tremendous opportunities to develop renewable energy resources that can provide energy to our nation without the devastating pollution and climate impacts of fossil fuels (Komor, 2004; Nye, 2001; Scheer, 2007; Tertzakian and Hollihan, 2009). Pursuit of the development of offshore oil and gas exploration diverts us from the needed task at hand.

Climate change poses serious risks to the State of Delaware. With miles of coastline and large-expanses of low-lying areas, Delaware is particularly vulnerable to the impacts of climate change (Frumhoff et al., 2007; Karl, Melillo and Peterson, 2009; Titus et al., 2009). The nation's continued commitment to developing fossil-based energy resources places the State of Delaware at a disproportionate risk of sea level rise.
The lesson of the Deepwater Horizon's oil spill in the Gulf of Mexico two years ago should inspire caution about the development of offshore oil and gas (Ladd, 2012; Mascarelli, 2012; Skogdalen and Vinnem, 2012; Sumaila et al., 2012). Delaware's coastal and aquatic resources provide tremendous value to our state (DNREC, 2004; Kauffman et al., 2011), which would be harmed in the case of an oil spill. Deepwater Horizon has proven the risks of such activities.

High intensity seismic testing itself places wildlife at risk. The Draft PEIS claims that these risks are moderate, minor or negligible, though we disagree. Acoustic pollution has been demonstrated to cause significant impacts on aquatic life. Declarations of the safety of the proposed high-intensity seismic testing, such as those asserted in the Draft PEIS, have not been proven in peer-reviewed scientific literature (Parsons et al., 2009; Popper et al., 2005; Slabbekoorn et al., 2010; Weilgart, 2007).

A tremendous proportion of aquatic life depends upon the continental shelves for foraging, habitat and reproduction. Seismic testing places not only endangered whales and sea turtles directly at risk with noise pollution, but it also threatens the multitude of species for which life within the aquatic environment depends.

We ask that the Bureau of Ocean and Energy Management protect the State of Delaware and the marine environment upon which we depend by prohibiting seismic testing and offshore oil and gas development in the Atlantic coastal region.

Thank you,

Amy Roe, Ph.D.
Energy and Environmental Policy
Sierra Club
Delaware Chapter
Conservation Chair
References:

DNREC, Delaware Department of Natural Resources and Environmental Control. 2004. *Striking a Balance: A Guide to Coastal Dynamics and Beach Management in Delaware*. Dover, DE: Delaware Department of Natural Resources and Environmental Control.


