Bring Back the Gulf

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July 23, 2014

Interior Secretary Sally Jewell
Office of the Secretary
United States Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Ms. Jewell:

As our nation rightfully moves forward with necessary ecosystem restoration efforts aimed at bringing the Gulf of Mexico back to its full health and productivity in the wake of the BP Deepwater Horizon disaster, the following individuals and organizational representatives express our support for strong and consistent implementation of the Department of Interior's *Idle Iron* policy requiring full decommissioning of spent oil and gas structures at the end of their useful economic life.

We are collectively committed to furthering the broad long-term restoration of the Gulf of Mexico in the context of reconstituting what has previously been one of the planet's most productive ecological treasures. This view is consistent with the simple fact that our nation's coastal and marine oil and gas infrastructure was always engineered and intended to be only temporarily deployed in our ocean waters and wetlands. As you know, each federal lease-sale for oil and gas development includes a contractual obligation to which industry has willingly committed, stipulating that all infrastructure must be removed and the seabed returned to its previous natural state at the end of the economic life cycle of each offshore production facility. This policy must be honored and acted upon in good faith.

Industry has expanded their requests for Interior Department waivers to *Idle Iron* protocols – instead seeking permanent seabed disposal of disused oil and gas infrastructure throughout Gulf of Mexico waters under the misnomer of *Rigs-to-Reefs* projects. The permanent seabed placement of obsolete oil and gas extraction infrastructure invites more ecosystem damage rather than restoring it as originally envisioned. The proposed additional discard of uncounted tons of deteriorating scrap metal into sensitive Gulf habitats will result in significant cumulative environmental degradation, including but not limited to more extensive overfishing, adverse impacts on migratory species, expanding opportunistic habitat for invasive species, and damaging impacts on deepwater corals and other marine life.

The primary beneficiary from such disposal methods is of course the oil and gas industry, which saves money and circumvents their liability on each waiver to the *Rigs-to-Reefs* programs in lieu of full decommissioning. Instead, we now need to apply our collective science-based efforts at true restoration measures. In this context, ocean dumping of spent

rigs represents a huge step backward and is clearly contrary to responsible restoration of our Gulf waters.

Gulf residents and stakeholders have already experienced devastating loss of wetlands caused in large part by extensive dredging for oil and gas industry infrastructure. Marine debris is another growing problem to which the oil and gas industry has contributed for many years. Infrastructure conflicts with certain sectors of commercial and recreational fishing pose additional hazards leading to costly equipment loss and human safety issues.

We seriously question whether the criteria of the National Artificial Reef Plan are being met with respect to the use of decommissioned rigs as underwater artificial habitats. The environmental impacts of the proliferation of *Rigs-to-Reefs* proposals, in the greater context of the overall impacts of such extensive oil and gas development on Gulf of Mexico ecosystems, and the large numbers of rigs coming up for decommissioning in the next few years, are not now being adequately considered in any cumulative context. An emerging concern is the potential for considerable hurricane damage to these structures. Hurricanes and tropical storms have led in the past to oil leaks, expensive disposal challenges, questionable liability issues, hazards to navigation and shipping accidents. Some of the existing spent rigs are continuing to leak hydrocarbons into the ocean for years after their useful life.

Decisions now being made about whether hundreds of remaining spent oil rigs need to be fully removed and seabed drilling sites restored as promised have very broad implications for the future of the Gulf and its residents. We have reached the point where the Gulf likely will not accommodate hundreds of additional at-sea rig disposals without sustaining tangible damage to the ecological balance of the region. We are reaching a critical threshold for seabed disposal of such structures. The Gulf is already home to the largest underwater artificial reef system in the world. These sites are managed by Gulf States that have accepted significant liability for their continued maintenance. Yet because these sites are not marine reserves, many of the fish they may aggregate contribute to overfishing of key Gulf fisheries, making it difficult to implement effective management strategies for species such as red snapper.

Left alone by human intervention and absent new damage, the ocean environment is a powerful and pervasive self-healing mechanism. A compelling case can be made that the natural ecosystem design that preceded the era of offshore oil development was likely the most successful biological niche that could have evolved in that particular location.

The outcome of the present debate over the future fate of obsolete drilling structures throughout the Gulf of Mexico has implications affecting as-yet-undrilled waters far beyond the confines of the Gulf itself. The Interior Department and the oil companies are well aware that altering the subsequent "life cycle costing" considerations for a company as it evaluates whether or not to bid on a particular drill site can alter a future bidding decision considerably when the drilling company knows it will not be required to remove and recycle the rig itself at the end of its useful lifetime.

America knows how to constructively and safely accomplish full decommissioning of spent drilling rigs that have been very profitable to their owners and shareholders. Clearly,

offshore operators should now follow through and step up to their legal responsibilities and fulfill the *Idle Iron* requirements to which they previously agreed.

Our organizations and our millions of members stand willing to work with the Department of Interior and all responsible parties of interest to ensure evenhanded enforcement of the *Idle Iron* policy to achieve responsible decommissioning of what were always intended to be temporary oil and gas structures and to move forward with restoration of the Gulf of Mexico to its full potential ecosystem productivity.

To achieve these goals, we ask the Interior Department to halt issuing waivers that enable spent rigs to remain on the ocean bottom and require restoration of the seabed to its original condition as required under the *Idle Iron* policy. This will promote fisheries management to reduce overfishing and help restore the Gulf of Mexico to its former vibrant health and productivity. The states can manage the extensive existing "reef" sites that comprise the largest artificial reef structure in the world for recreational and commercial fishing and diving.

We further recommend:

- That a broad representation of the full range of public interests be more inclusively involved in the relevant federal and state decision-making processes regarding spent oil and gas structures
- Monitoring of state *Rigs-to-Reefs* programs to ensure ecological integrity in maintenance and future deployments
- Independent scientific research that is not unduly influenced by the oil and gas industry, especially for deep-sea processes that are vulnerable to impacts accompanying the growth of deepwater drilling
- Enforcement of existing environmental laws that can help ensure a healthy Gulf of Mexico
- Support effective management of all fisheries for long-term, ecosystem-based resilience and sustainability
- Creation of deepwater preserves to protect biologic diversity and provide research opportunities through a Gulf-wide monitoring effort, especially in the northern Gulf, where oil production remains concentrated.

The most optimistic and compelling goal of successful restoration would be to achieve strong economic valuation and full ecosystem productivity by anticipating rather than impeding future sustainable use. The value of a Gulf of Mexico that boasts sustainable seafood harvests, safe navigation, ecological stability, and a healthy quality of life for its residents is worth protecting. The alternative is massive fiscal and ecological liabilities that will fall to the public as a result of an expansion of the practice of simply discarding retired rigs on the seabed. The decisions now before us about whether or not to restore the Gulf will ultimately determine the fate of much of our global ocean. We can either restore it to its former vitality, or allow it to become a junkyard of epic proportions.

Thank you for your consideration.

Sincerely,

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