



July 2, 2020

Submitted via www.regulations.gov
Docket ID: NOAA-NOS-2019-0033

Mr. George P. Schmahl
Superintendent
Flower Garden Banks National Marine Sanctuary
4700 Avenue U, Building 216
Galveston, TX 77551

Superintendent Schmahl:

The American Petroleum Institute, National Ocean Industries Association, International Association of Geophysical Contractors, and Offshore Operators Committee (The Associations) offer the following comments in support of the revisions to the Flower Garden Banks National Marine Sanctuary (FGBNMS) terms of designation that will expand the sanctuary to include portions of 14 additional reefs and banks in the northwestern Gulf of Mexico. The Associations also support applying the existing FGBNMS regulations to the expanded locations and urge NOAA to move forward with finalizing the expansion as proposed.

The Associations and our members support preservation of marine areas and resources through the Sanctuaries Program, where appropriate. The Associations strongly support designation of areas based on the following key principles:

- Identify sites that are truly unique places of “national significance” (National Marine Sanctuaries Act (“NMSA”), Sections 301 & 303);
- Base the value proposition, threat identification and benefit assessments on science and evidence (NMSA, Section 303);
- Allow for multiple use with reasonable access regulations and reasonable mitigation measures that directly address threats (NMSA, Sections 301(b)(6) & 303(b)(1));
- Recognize other agencies’ statutory responsibilities and protective regulations and avoid duplicative regulation and unnecessary restriction of activities that do not threaten Sanctuary resources (NMSA, Sections 301 & 303(b)); and,
- Use a collaborative, consensus-building, transparent process for selection and management of Sanctuary resources (NMSA, Sections 303(b)(2), 304 & 315).

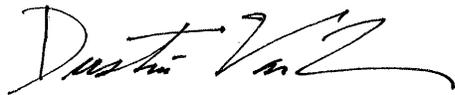
The Associations are pleased to support NOAA Sanctuaries’ proposal, which follows the recommendations of the FGBNMS Advisory Council. We also support the process used during the development of the final proposal, where the Sanctuary staff and the Advisory Council were able to find consensus by using a data-driven approach to determine the new sanctuary boundaries and that the current regulations were sufficient. Our members have significant interest in ensuring

that future opportunities for offshore oil and natural gas exploration and development remain available. We fully support the efforts of the FGBNMS Advisory Council, to ensure that the boundaries of the new banks and reefs provide protection for these important marine areas while allowing for environmentally responsible exploration and production of oil and natural gas resources in the surrounding areas. NOAA's preferred alternative strikes a balance that will benefit the long-term economic and environmental health of the Gulf of Mexico.

In addition, the Associations would like to recognize the tireless efforts of Mr. Clint Moore, former chair of the Advisory Council and the long-time oil and natural gas industry representative on the council. Clint's dedication and passion for the Flower Garden Banks was never in question, and his work was fundamental in getting industry support for this expansion effort. He will be missed.

Thank you for the opportunity to provide our comments. Should you have any questions please contact Andy Radford at radforda@api.org.

Sincerely,



Dustin Van Liew
Vice-President of Regulatory & Government Affairs
International Association of Geophysical Contractors



Andy Radford
Senior Policy Advisor
American Petroleum Institute



Erik Milito
President
National Ocean Industries Association



Greg Southworth
Associate Director
Offshore Operators Committee