The Honorable Paul LePage, Governor of Maine (Chair)
The Honorable Phil Bryant, Governor of Mississippi (Vice Chair)
The Honorable Kay Ivey, Governor of Alabama
The Honorable Bill Walker, Governor of Alaska
The Honorable John Bel Edwards, Governor of Louisiana
The Honorable Greg Abbott, Governor of Texas

March 9, 2018

The Honorable Ryan Zinke
Secretary
United States Department of the Interior
1849 C Street, NW
Washington, DC 20240



RE: Request for Comments on the 2019 – 2024 Draft Proposed Outer Continental Shelf Oil & Gas Leasing Program

Dear Secretary Zinke:

The Outer Continental Shelf (OCS) Governors Coalition is pleased to submit comments on the Draft Proposed 2019 – 2024 Outer Continental Shelf Oil & Gas Leasing Program (Draft Proposed Program). We first would like to thank you for considering the request of the OCS Governors Coalition in your decision to include expanded areas for further offshore leasing consideration, including in the Atlantic, Gulf of Mexico, and the Alaskan Arctic.

The OCS Governors Coalition was created by governors from coastal states in May 2011 to promote a constructive dialogue on OCS energy-resource planning and development between coastal state governors and federal policy makers. The bipartisan group of governors supports policies that encourage a safe, responsible expansion of offshore oil, natural gas, and renewable energy development to the benefit of the nation, our states, and our citizens. As state executives, our principal role in the OCS Governors Coalition is to consider the opportunities and challenges of offshore energy development and coastal management in order to appropriately balance economic prospects with the health and safety of our citizens and coastal resources. We believe that opening up new OCS areas for responsible energy development and expanding revenue sharing to all participating coastal states and communities will lead to a more prosperous and secure future for our citizens.

The Draft Proposed Program is the first of three proposals issued by the Bureau of Ocean Energy Management (BOEM) during the formation of the new Five Year Program. It identifies the maximum extent of areas that will be further analyzed during the process. We understand that once an area is narrowed, it cannot be expanded without an act of Congress or restarting the entire Five Year Program development process. Therefore, with limited exceptions, the OCS Governors Coalition urges the BOEM to preserve the full extent of all OCS planning areas identified at this stage and not further restrict access to development until after the issuance of the Final Program. While the OCS Governors Coalition recognizes that individual states may identify areas of specific concern that should be considered, additional narrowing or exclusion of proposed lease areas should be delayed until after BOEM has completed the Programmatic Environmental Impact Statement to the maximum extent possible. Forthcoming environmental analyses conducted during the National Environmental Policy Act process and ongoing conversations with federal agencies, states, oil and gas operators, renewable energy producers, various marine industries and other stakeholders will determine the areas that are ultimately included in the final program and scheduled for potential lease.

The Draft Proposed Program contains lease sale options for twenty-five OCS planning areas within four regions. The lease sale proposal includes nineteen lease sales for the Alaska region including the Chukchi Sea (2020, 2022, 2024), Beaufort Sea (2019, 2021, 2023), and Cook Inlet (2021, 2023); twelve lease sales in the Gulf of Mexico region including two region-wide sales each year from 2020 to 2024 and one lease sale each year in 2023 and 2024 for areas currently closed to access; nine lease sales in the Atlantic Region including three in the South Atlantic (2020, 2022, 2024), three in the Mid-Atlantic (2020, 2022, 2024), two in the North Atlantic (2021 and 2023) and one in the Straits of Florida (2023), as well as seven in various areas of the Pacific region (2020, 2021, 2022, 2023). The OCS Governors Coalition generally supports this proposal, particularly with regard to the Atlantic, Gulf of Mexico, the Alaska Arctic (Beaufort and Chukchi Seas) and Cook Inlet areas.

The OCS Governors Coalition also welcomes the Trump Administration's support for existing revenue sharing with states, and continues to encourage support for legislative efforts to expand revenue sharing to all participating coastal states. Further, we urge that the existing revenue sharing cap for the Gulf States be lifted, thus ensuring a more equitable system of sharing the benefits of offshore development with the affected states. Sharing of revenues with coastal states can help address the externalities that states and coastal counties assume with offshore oil, natural gas, and wind development. The current system of limited revenue sharing utilized in the Gulf of Mexico provides state governments only some of the resources necessary to expand coastal management and conservation, build new roads, docks, ports and other necessary infrastructure, and expand other public services. We strongly believe that equitable revenue sharing allows states to properly address the coastal impacts of offshore production.

As noted in our August 17, 2017 comment letter in response to BOEM's Request for Information, in addition to the benefits that could come from revenue sharing, expanded access to offshore energy resources in regions like the Atlantic, Gulf of Mexico, and Alaska will allow coastal states and communities to realize great economic opportunities. The successful development of the Gulf of Mexico and the initial exploration of Alaska's OCS demonstrate how responsible offshore energy development can generate many good paying jobs, spur activity in a host of associated industries, and generate billions of dollars in tax revenue.

Tapping into additional abundant offshore energy resources in the Atlantic, Gulf of Mexico, and Alaskan Arctic regions has the potential to create over a half million good paying jobs and generate hundreds of billions of dollars in additional government revenue that could help fund critical needs. Advanced drilling techniques, marine well containment and spill response -- combined with greater regulatory oversight -- make environmentally safe access to offshore oil and gas resources more attainable and economical.

We appreciate the BOEM's efforts to engage coastal governors in this important process and look forward to continuing this dialog throughout the development of the leasing program. Please direct any questions to Steve McGrath, Director of the Maine Governors Energy Office at steven.g.mcgrath@maine.gov. Mr. McGrath serves as the point of contact for Governor LePage, Chair of the OCS Governors Coalition.

Sincerely,

Governor Paul R. LePage

State of Maine

Chair, OCS Governors Coalition

Governor Kay Ivey State of Alabama

Governor John Bel Edwards

State of Louisiana

Governor Phil Bryant State of Mississippi

Vice Chair, OCS Governors Coalition

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