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The Honorable Ken Salazar
Secretary of the Interior
United States Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

NOV 2 1 2012

Dear Secretary Salazar,

I am writing as Chairman of the Sport Fishing and Boating Partnership Council (Council) to ask your support and leadership in addressing an issue that has the potential to be a win-win for the recreational angling and boating community, the Department of the Interior, and other Federal agencies in the Gulf of Mexico region. I wrote you back in June 2012 regarding the implementation of the "Idle Iron" policy in the Gulf. At that time, the Council suggested that a moratorium on the implementation of the policy be instituted because of the potential loss of fish habitat and fishing opportunity caused by the precipitous removal of decommissioned oil and gas infrastructure from Gulf waters. However, after the Council heard from Bureau of Safety and Environmental Enforcement (BSEE) Director James Watson and a panel of issue stakeholders at our recent meeting on November 7, 2012, we believe there are short-term and long-term solutions available that will allow the continued decommissioning of oil and gas infrastructure while simultaneously increasing the amount of recreational fishing and boating opportunities. I am writing to share some of these possible solutions with you, to commend Director Watson for his work on this issue, and to urge that you provide Director Watson with all of the tools and support he needs to address these issues in an expeditious manner, including engagement between Federal agencies through the National Ocean Council. Finally, I am requesting a meeting with you and a group of Council members to discuss this issue and other key issues of importance to the recreational angling and boating community that would benefit from your leadership over the next 4 years.

As you are aware, research indicates that oil and gas production platforms and other structures create significant habitat and complex coral reef ecosystems for fish and other aquatic species in a Gulf environment which has very few such complex, natural habitats. You need only ask an avid angler in the Gulf region to show you where he or she fishes to see that a substantial amount of boat-based fishing on the

Gulf of Mexico occurs around oil and gas production infrastructure. While in the past the trend of increased installation of oil infrastructure in the Gulf held true, in recent history removal has outpaced installation, especially off the Texas coast. Given the dearth of natural fish habitat in the Gulf, this trend has caused concern within the recreational angling and boating community. These concerns eventually led the introduction of legislation in Congress to halt policy implementation.

However, as the community has learned more about the issue, it is clear that the issue of decommissioning and removing (or reefing) of oil infrastructure is much more complex than was earlier realized: in this case, complexity that results from the involvement of many Federal agencies, States and industry. Based on the panel discussion held at the November 7 Council meeting in Corpus Christi, Texas, there are positive actions which can be taken by the Federal government that will result in the increased use of decommissioned oil rig materials being made available for use in the Rigs to Reef Program. The dialog between panelists at the Council meeting indicates that consensus among Federal and stakeholder representatives can be found through a coordinated effort. Panelists included: BSEE Director Watson; Dr. Larry McKinney, Texas A&M University – Corpus Christi; Dale Shively, Artificial Reef Program Leader for the State of Texas; Drew Hunger, Decommissioning Manager for Apache Corporation; and Ted Venker, Conservation Director for the Coastal Conservation Association and Council member.

While I will not delve into detail in this correspondence, I am summarizing the policy concepts which were discussed by the Council and the issue stakeholder panel, and on which there appeared to be consensus.

- Improve efficiency of the Rigs to Reefs permitting process, with a goal of having Federal agencies (BSEE and BOEM) establish a 6 month timeline for completing the process.
- Open more reef planning areas, especially closer to shore, and focus staff from the various agencies with jurisdiction on this common goal. For example, near-shore sites were recently approved off of the coast of Texas. Oil industry representatives at the Council meeting indicated that this is critical in making more decommissioned infrastructure available for reefing since the economic "break even" point between reefing and on-shore salvage operations is a 36 mile tow.
- Establish more reef sites.
- Develop a sliding scale water cover requirement over reef sites based on water depth and likelihood of commercial boat traffic. Panelists indicated that current policy prescribes 85 feet of water cover. This creates a major impediment to siting reefs in shallow water areas where the need and demand is greatest and traffic by large commercial vessels is least likely.

- Review 2009 Rigs to Reefs Addendum to determine whether the required 5 mile separation between reef areas can be reduced. Oil industry representatives on the panel indicated that they need as little as ½ mile to be able to continue to manage active infrastructure on the Gulf floor. The Special Artificial Reef Sites (SARS) program should also be reestablished to allow toppling in place as a reefing option.

- Maintain reef donation to States in exchange for the State taking liability for the reef.

It is our sense that through your leadership and that of Director Watson, solutions can be crafted that will benefit fishery and aquatic resources, recreational anglers and boaters, and the coastal economies which depend on the positive economic activity generated by anglers and boaters. We ask you to take a leadership role in raising the visibility of this issue with your colleagues in other Departments and agencies; thereby helping focus federal agency resources and overcoming interagency roadblocks to address the issue. The ideas communicated in this correspondence appear to have a real potential for increasing artificial reef material in the Gulf of Mexico that will, in turn, provide increased habitat to benefit the conservation and restoration of importance fish species and populations, and aquatic habitat.

A select group of Council members would like to meet with you to further discuss this important matter, and also to discuss potential shared priorities between the Interior Department, the Council, and the broader recreational angling, boating, and aquatic resource conservation community during the next 4 years. Council Coordinator Doug Hobbs will be happy to assist your staff in scheduling a date and time of your convenience.

Thank you for your leadership in conserving our Nation's aquatic resources.

Sincerely,

Thomas J. Dammrich
Chairman

Cc: SFBPC members
Dan Ashe, FWS Director
James Watson, BSEE Director
Thomas Lillie, Chief of Staff-BSEE
Deerin Babb-Brott, Director-NOC
Elizabeth Stevens, AD-AEA
Bruce Decker, Chief, DPPS