

UNITED STATES DEPARTMENT OF THE INTERIOR
OFFICE OF HEARINGS AND APPEALS
INTERIOR BOARD OF LAND APPEALS

APPEAL FROM THE BUREAU OF OCEAN ENERGY MANAGEMENT

Application for Permit to Conduct Geophysical Exploration for Mineral Resources on the
Outer Continental Shelf
E14-001, E14-003, E14-004, E14-005, E14-006 & E14-007

IBLA Case Nos. 2017-0135, *et al.* & 2017-0140

CGG Services Inc., International Association of Geophysical Contractors, Ion/GX Technology
Corporation, MultiKlient Invest AS, Spectrum Geo, Inc., TGS and WesternGeco LLC,

Appellants,

vs.

Bureau of Ocean Energy Management,

Appellee.

MOTION TO INTERVENE

The Business Alliance for Protecting the Atlantic Coast (“BAPAC”) hereby moves to intervene
in the two pending appeals before the Interior Board of Land Appeals (“IBLA”) contesting the January
6, 2017, decisions of the Bureau of Ocean Energy Management (“BOEM”) to deny appellants’ permit

applications to conduct airgun seismic surveys for oil and gas reserves on the Atlantic Outer Continental Shelf (“OCS”).¹

I. Statement of the Case

On January 5, 2017, while six applications to conduct airgun seismic surveys in the Mid- and South Atlantic Planning Areas were pending before BOEM, its Director issued a memorandum directing denial of those pending applications. On January 6, 2017, BOEM denied all six pending permit applications. On March 2, and March 3, 2017, those six applicants and the IAGC filed appeals to this Board. On March 30, 2017, BAPAC representatives met with BOEM’s Acting Director and were informed of the appeals to this Board.² (Ex. 1, Knapp Decl. ¶ 17.) This motion to intervene follows.

II. Standard of Review

The regulation governing intervention before the IBLA is as follows:

- (a) A person who wishes to intervene in an appeal must file a motion to intervene within 30 days after the person knew or should have known that the decision had been appealed to the Board.
- (b) A motion to intervene must set forth the basis for the proposed intervention, including:
 - (1) Whether the person had a right to appeal the decision under § 4.410 or would be adversely affected if the Board reversed, vacated, set aside, or modified the decision; and

¹International Association of Geophysical Contractors (“IAGC”) is a membership organization to which the other appellants belong, but which does not have its own permit application on review. IAGC was granted standing in these cases in the April 21, 2017, order of this Board.

² Those six appeals were consolidated into two cases by order of this Board on March 31, 2017. On that date, appellants were also granted an extension of time to file their statements of reasons until sixty days after the IBLA receives the administrative record, which is currently being compiled by BOEM.

- (2) How and when the person learned of the appeal.
- (c) The Board may:
 - (1) Grant the motion to intervene;
 - (2) Deny the motion to intervene for good cause, e.g., where granting it would disadvantage the rights of the existing parties or unduly delay adjudication of the appeal;or
 - (3) Grant the motion to intervene but limit the person's participation in the appeal.

43 C.F.R. § 4.406. Thus, this Board has broad power to grant intervention. *See Alder Gulch, LLC*, 184 IBLA 48, 2013 WL 6162254 (July 3, 2013) (allowing intervention *sua sponte* after deciding that a person was not a party but would be an appropriate intervenor if such a motion had been made); *Klamath-Siskiyou Wildlands Center, et al.*, IBLA 2012-155, 2012 WL 5900116, at n.12 (Nov. 7, 2012) (granting a motion to intervene for one party with a financial stake in the outcome and allowing *amicus curiae* status for the county); *HELPHINKLEY.ORG*, IBLA 2012-98, 2012 WL 3757008, at *4 (July 10, 2012) (granting a motion to intervene).

III. Manner of Notice and Timeliness of Intervention

As an initial matter, BAPAC is filing this motion to intervene in compliance with 43 C.F.R. §§ 4.406(a)-(b) & 4.22 (e). On March 30, 2017, at 4:00 p.m. Frank Knapp, President and CEO, and other BAPAC members met with BOEM Acting Director Walter Cruickshank and his staff, along with Jim Schindler of the Department of Interior. (Knapp Decl. ¶ 17.) At that time Mr. Cruickshank advised BAPAC that the seismic companies had appealed their permit denials. (*Id.*) That meeting was the first time that BAPAC had notice of the appeals. (*Id.*) Because BAPAC learned of the decision on March 30, 2017, and is filing this motion on May 1, 2017, in accordance with 43 C.F.R. § 4.22(e), it has complied with the timeliness requirements for intervention in 43 C.F.R. § 4.406(a), and has hereby laid out how and when it learned of the appeal as required by 43 C.F.R. § 4.406(b)(2).

IV. BAPAC's Business Interests

BAPAC works “to ensure the long term health and economic vitality of the Atlantic seaboard through responsible stewardship of the coastal and ocean waters.”³ It is a membership organization that consists of over 41,000 businesses and business organizations, and over 500,000 commercial fishing families that depend upon the Atlantic Ocean to maintain economic viability. (Knapp Decl. ¶ 4.) These businesses include commercial fishing, recreational fishing rentals/sales, hotels/vacation rentals, restaurants, realtors, and retail. (*Id.* at. ¶ 14.) Overall, businesses along the Atlantic in fishing, recreation, and tourism provide nearly 1.4 million jobs and over \$95 billion in gross domestic product.⁴

Commercial fishing businesses and business organizations rely on healthy populations of marketable fish, which they catch and sell. BAPAC has over half a million such business interests. Some examples include Main Coast Fishermen's Association,⁵ Murrells Inlet Seafood, Duna Fisheries, LLC, and Maine Clammers Association, to name a few. (Ex. 2, Letters to Pres. Obama.) The commercial fishing businesses in BAPAC catch and sell fish in the Atlantic OCS areas where seismic airgun surveys would occur if the appellants' permits were granted.⁶

³ Business Alliance for Protecting the Atlantic Coast, “Who We Are,” *available at* <http://protectingtheatlanticcoast.org/about-us/> (last visited May 1, 2017).

⁴ Menaquale, Andrew, *Offshore Energy by the Numbers* (January 2015), *available at* <http://oceana.org/publications/reports/offshore-energy-numbers> (last visited May 1, 2017).

⁵ Business Alliance for Protecting the Atlantic Coast, “Business Organizations,” *available at* <http://protectingtheatlanticcoast.org/business-organizations/> (last visited May 1, 2017).

⁶ See OCEANA, *Overlap of Proposed Seismic Airgun Blasting Areas and Essential Fish Habitat and Critical Habitat in the Atlantic*, *available at* http://usa.oceana.org/maps-show-risk-marine-life-threatened-unnecessary-seismic-airgun-blasting?_ga=1.236735553.1966431777.1455746623 (last visited May 1, 2017).

The tourism businesses and organizations in BAPAC rely on an attractive, inviting and healthy Atlantic Ocean and its beaches to draw tourists. The tourism businesses provide goods and services to tourists when they visit, including hotels and other accommodations, restaurants, retail stores, and many others. Some examples of tourism businesses in BAPAC include the Bently Inn, the Inn at Pamlico Sound, Koru Village Resort and Spa, Tautogs Restaurant, Sheila's Carolina Kitchen, Luther Marine Maintenance, Dough Boy's Pizza Restaurants, Aurora Wellness Services, Shuckin Shack Oyster Bar, Naples Beach Hotel and Golf Club, Crystal Blue Productions, and Windswept Massage, to name a few. (Ex. 2, Letters to Pres. Obama.) Additionally many chambers of commerce and associations are part of BAPAC because of their members' interests in the tourism industry, such as Cape May County Chamber of Commerce, Carteret County Chamber of Commerce, Miami Beach Chamber of Commerce, Outer Banks Chamber of Commerce, South Carolina Small Business Chamber of Commerce, New Jersey Tourism Industry Association, Virginia Beach Hotel Association, and Virginia Beach Restaurant Association.⁷ BAPAC tourism businesses operate in or near the Atlantic OCS waters where seismic airgun surveys would occur if the appellants' permits were granted.

The recreational businesses and organizations in BAPAC offer services such as fishing tours, boating tours, kayaking tours, surfing lessons, diving tours, and other services to their customers. Some of the BAPAC recreational businesses advertise activities which are reliant upon viewing or catching marine animals, such as catching sport fish or viewing whales and sea turtles. For example, recreational business in BAPAC include Blue Planet Scuba, Cocoa Beach Parasail, Charleston Outdoor

⁷ Business Alliance for Protecting the Atlantic Coast, "Business Organizations," available at <http://protectingtheatlanticcoast.org/business-organizations/> (last visited May 1, 2017).

Adventures, Delmarva Board Sport Adventures, Dive Services Inc., Paddle Surf New Jersey LLC, Sage Sailing, Inc., Sealand Adventure Sports, Sunrise Surf & Skateboard Shop, Surf City Surf School, Tula Adventure Sports, Hatteras Island Board Sports, Hatteras Island Surf and Sail Shop, Just for the Beach Rentals, Long Beach Surf Shop, Off the Hook Fishing Charters, and Rover Tours, Inc. (Ex. 2, Letters to Pres. Obama.) These businesses provide their services in and/or near the Atlantic OCS waters where seismic airgun surveys are proposed to occur if the permits are granted.⁸

V. Adverse Effects of a Reversal on BAPAC

BAPAC “would be adversely affected if the Board reversed, vacated, set aside, or modified the decision,” to deny the permits at issue, and thus, should be allowed to intervene. 43 C.F.R. § 4.406 (b)(1). The seismic airgun surveys at issue would entail loud, repetitive, explosive sounds that can travel up to 2,500 miles every ten seconds for as long as the permits are issued along the Atlantic OCS.⁹ If this Board were to reverse BOEM’s permit denial decisions, BAPAC members would go out of

⁸ See OCEANA, *Overlap of Proposed Seismic Airgun Blasting Areas and Essential Fish Habitat and Critical Habitat in the Atlantic*, available at http://usa.oceana.org/maps-show-risk-marine-life-threatened-unnecessary-seismic-airgun-blasting?_ga=1.236735553.1966431777.1455746623 (last visited Apr. 27, 2017); *Overlap of Proposed Seismic Airgun Blasting Areas and Critical Habitat for Loggerhead Sea Turtles*, available at http://usa.oceana.org/sites/default/files/4046/overlap_of_proposed_seismic_airgun_blasting_areas_and_critical_habitat_for_loggerhead_sea_turtles.jpg (last visited Apr. 27, 2017); *Overlap of Proposed Seismic Airgun Blasting Areas and Critical Habitat for North Atlantic Right Whales*, available at http://usa.oceana.org/sites/default/files/4046/overlap_of_proposed_seismic_airgun_blasting_areas_and_critical_habitat_for_north_atlantic_right_whales.jpg (last visited Apr. 27, 2017).

⁹ Nieukirk, S. L., Mellinger, D. K., Moore, S. E., Klinck, K., Dziak, R. P., & Goslin, J. (2012). *Sounds from airguns and fins whales recorded in the mid-Atlantic Ocean, 1999-2009*. The Journal of the Acoustical Society of America, 131(2), 1102-1112; *Seismic Surveys at Sea: The contributions of airguns to ocean noise*. (2004) Backgrounder: Acoustic Ecology Institute; National Research Council. *Ocean Noise and Marine Mammals*. Washington, DC: The National Academies Press. (2003). doi:10.17226/10564.

business and/or lose significant revenue that is currently generated by and reliant upon the Atlantic OCS.

For example, commercial and recreational fishing are dependant upon the abundance of fish and shellfish in the Atlantic waters. Seismic airgun surveys have been shown to cause a decline in fish that are caught for commercial and recreational purposes. That decline is significant, ranging from 40% to 80% of the populations in and near areas where seismic airgun blasting occurs.¹⁰ Seismic airgun

¹⁰ Dalen, J., & Knutsen, G. (1987). *Scaring effects in fish and harmful effects on eggs, larvae and fry by offshore seismic explorations*. Progress in underwater acoustics (pp. 93-102); Springer; Engas, A., Lokkeborg, S., Ona, E., & Soldal, A.V. (1996). *Effects of seismic shooting on local abundance and catch rates of cod (Gadus morhua) and haddock (Melanogrammus aeglefinus)*. Canadian Journal of Fisheries and Aquatic Sciences, 53(10), 2238-2249. doi: 10.1139/cjfas-53-10-2238; Hassel, A., Knutsen, T., Dalen, J., Skaar, K., Lokkeborg, S., Misund, O., Ostensen, O., Fonn, M., & Haugland, E. (2004). *Influence of seismic shooting on the lesser sandeel (Ammodytes marinus)*. ICES Journal of Marine Science: Journal du Conseil, 61(7), 1165-1173; Lokkeborg, S. (1991). *Effects of a geophysical survey on catching success in longline fishing* ICES CM Documents; Skalski, J., Pearson, W., & Malme, C. (1992). *Effects of sounds from a geophysical survey device on catch-per-unit-effort in a hook-and-line fishery for rockfish (Sebastes spp.)*. Canadian Journal of Fisheries and Aquatic Sciences, 49(7), 1357-1365; Slotte, A., Hansen, K., Dalen, J., & Ona, E. (2004). *Acoustic mapping of pelagic fish distribution and abundance in relation to a seismic shooting area off the Norwegian west coast*. Fisheries Research, 67(2), 143-150. doi: 10.1016/j.fishres.2003.09.046; Paxton, A. B., Taylor, J. C., Nowacek, D. P., Dale, J., Cole, E., Voss, C. M., & Peterson, C. H. 2017. *Seismic survey noise disrupted fish use of a temperate reef*. Marine Policy.78:68 - 73. <https://doi.org/http://dx.doi.org/10.1016/j.marpol.2016.12.017> ; McCauley, R., Fewtrell, J., Duncan, A., Jenner, C., Jenner, M., Penrose, J., Prince, R., Adhitya, A., Murdoch, J., & McCabe, K. (2000). *Marine seismic surveys: Analysis of airgun signals; and effects of air gun exposure on humpback whales, sea turtles, fishes and squid*. Rep. from Centre for Marine Science and Technology, Curtin Univ., Perth, WA, for Austral. Petrol. Prod. Assoc., Sydney, NSW, 8-5; McCauley, R., Fewtrell, J. & Popper, A. (2003). *High intensity anthropogenic sound damages fish ears*. The Journal of the Acoustical Society of America, 113(1), 638-642; McCauley, Robert D, et al. "High Intensity Anthropogenic Sound Damages Fish Ears." The journal of the acoustical society of America 113, no. 1 (2003): 638-42.

surveys have also caused shellfish that are commercially harvested, such as crabs and scallops, to both decline and become deformed, which would make such catches unmarketable.¹¹

For all of these commercial or recreational fishing businesses, including the over 500,000 fishing families in BAPAC, a decline in the fish that they catch and/or sell means a decline in revenue. If the decline is significant enough, the commercial and recreational fishing businesses in BAPAC will go out of business. Therefore, if seismic airgun surveys were conducted along the Atlantic OCS, then BAPAC commercial and recreational fishing businesses and business associations would be directly injured by lost revenue and business.

The BAPAC businesses and business associations that rely on recreation along the Atlantic OCS will also be directly impacted through lost revenues if seismic airgun surveying is allowed. Activities such as diving will not be possible due to the noise.¹² Businesses that offer other recreational activities tied to viewing marine life will suffer because seismic airguns have been shown to cause a reduction in marine life.¹³ In addition to losing fish for sport fishing or consumption, seismic airgun

¹¹Moriyasu, M., et al. 2004. *Effects of seismic and marine noise on invertebrates: A literature review*. Canadian Science Advisory Secretariat. Research document 2004/126. 26DFO (Department of Fisheries and Oceans). 2004; *Potential impacts of seismic energy on snow crab*. DFO Can. Sci. Advis. Sec. Habitat Status report No. 2004/003; Aguilar de Soto, N., Delorme, N., Atkins, J., Howard, S., Williams, J. and Johnson, M.2013. *Anthropogenic noise causes body malformations and delays development in marine larvae*. Scientific Reports 3: 283 DOI:10.1038/srep02831.

¹² The Diving Medical Advisory Committee advises conducting a joint risk assessment for any diving within ten kilometers of seismic operations. DMAC, "Safe Diving Distance from Seismic Surveying Operations," (July 2011), *available at* <http://www.dmac-diving.org/guidance/DMAC12.pdf>.

¹³ *See supra* n.10.

surveying harms and drives away whales and sea turtles.¹⁴ These recreational businesses will lose revenue if the permit denials are reversed because their customers pay to engage in activities along and near the Atlantic OCS that rely upon fish, whales and sea turtles that would be physically harmed, beached or driven away from viewing areas and natural habitat by seismic airgun surveys.

These examples are just some of the ways in which the members of BAPAC, as part of the coastal economy along the Atlantic, will be harmed.¹⁵ BAPAC and its members have a strong interest in the permits at issue in this case because if this Board were to reverse BOEM and allow seismic airgun blasting, BAPAC members will lose revenue. Therefore, BAPAC is adversely affected, and should be allowed to intervene in these appeals. 43 C.F.R. § 4.406 (b)(1); *see also Alder Gulch*,

¹⁴ Gordon, J., Gillespie, D., Potter, J., Frantzis, A., Simmonds, M. P., Swift, R., and Thompson, D. 2004. *A review of the effects of seismic surveys on marine mammals*. Mar. Technol. Soc. J. 37(4):16 – 34; Rolland, R. M., et al. "Evidence That Ship Noise Increases Stress in Right Whales." Proceedings of the Royal Society B-Biological Sciences 279, no. 1737 (Jun 22 2012): 2363-68; Miller, P., et al. "Using at-Sea Experiments to Study the Effects of Airguns on the Foraging Behavior of Sperm Whales in the Gulf of Mexico." Deep-Sea Research Part I-Oceanographic Research Papers 56, no. 7 (Jul 2009): 1168-81; Castellote, M., et al. "Acoustic and Behavioural Changes by Fin Whales (*Balaenoptera Physalus*) in Response to Shipping and Airgun Noise." Biological Conservation 147, no. 1 (3// 2012): 115-22; McCauley, R., Fewtrell, J., Duncan, A., Jenner, C., Jenner, M., Penrose, J., Prince, R., Adhitya, A., Murdoch, J., & McCabe, K. (2000). *Marine seismic surveys: Analysis of airgun signals; and effects of air gun exposure on humpback whales, sea turtles, fishes and squid*. Rep. from Centre for Marine Science and Technology, Curtin Univ., Perth, WA, for Austral., Petrol. Prod. Assoc., Sydney, NSW, 8-5; Weir, C. (2007). *Observations of marine turtles in relation to seismic airgun sound off Angola*. Marine Turtle Newsletter, 116, 17-20.

¹⁵ Other examples of BAPAC businesses that will suffer if the Atlantic OCS is subjected to seismic airgun surveys include the following: Hotels and vacation rentals will have reduced bookings with marine mammal strandings on beaches and less demand from recreational fisherman; restaurants will suffer from increased costs for fresh fish and loss of customers; realtors will have reduced sales and rentals due to fewer showings and less demand; and retail stores will have reduced sales due to reduced number of tourists. All of these businesses would suffer from the negative publicity resulting from marine mammal and fish losses associated with seismic surveys.

LLC, 184 IBLA 48, 2013 WL 6162254 (July 3, 2013); *Klamath-Siskiyou Wildlands Center, et al.*, IBLA 2012-155, 2012 WL 5900116, at n.12 (Nov. 7, 2012); *HELPHINKLEY.ORG*, IBLA 2012-98, 2012 WL 3757008, at *4 (July 10, 2012).

VI. BAPAC is a Party due to its Participation in the Process

In the alternative to finding intervenor status, BAPAC asserts that it may be considered a “party” to these appeals because of its participation in the process and opposition to seismic testing on the Atlantic OCS. A party is broadly defined as anyone who “participated in the process leading to the decision under appeal, e.g., by filing a mining claim or application for use of public lands, by commenting on an environmental document, or by filing a protest to a proposed action.” 43 C.F.R. § 4.410(b).

BAPAC has been advocating against seismic airgun surveying on the Atlantic OCS since its formation in September 2016. (Knapp Decl. ¶¶ 2, 7.) The BAPAC Board of Directors met with BOEM officials on November 14, 2016. (*Id.* at ¶ 15.) In that meeting each BAPAC representative had an opportunity to speak to BOEM officials. (*Id.*) Each BAPAC representative provided industry-specific information based on their own areas of expertise and places in the business community. (*Id.*) However, all BAPAC representatives had the same request: for permanent protection of the Atlantic Ocean from offshore drilling activities, which include denying all pending seismic airgun blasting permits. (*Id.*) BAPAC was thanked by BOEM for providing comments and encouraged to continue to stay active and engaged. (*Id.*)

BAPAC also sent two letters to President Obama in opposition to seismic testing, on October 27, 2016 and December 13, 2016. (Attached as Ex. 2). In these letters, BAPAC expresses its strong

opposition to seismic airgun surveying in the Atlantic OCS. (*Id.*) BAPAC also asks President Obama to deny all permits for any type of geological and geophysical (G&G) activities in the Atlantic Ocean, including seismic testing. (*Id.*) These letters are signed by hundreds of members and supporters of BAPAC, in addition to the association itself. (*Id.*)

In this very case, this Board has allowed a membership organization to be considered a party because of its participation in the process. (April 21, 2017, Order.) “IAGC participated in the process leading to BOEM's decisions by providing comments on environmental documents and permit applications relevant to BOEM's decisions.” (*Id.* at 1-2.) Thus, this Board granted IAGC party status in these appeals. Similarly, BAPAC participated in the process by providing comments. BAPAC even took the initiative to have its entire board of directors meet and discuss the permit applications with BOEM. Therefore, BAPAC may also be considered a party pursuant to 43 C.F.R. § 4.410(b).

VII. Conclusion

For all of the above reasons, BAPAC respectfully requests that this Board grant its motion to intervene.

Respectfully submitted,



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Georgetown, South Carolina
May 1, 2017

Exhibit 1

UNITED STATES DEPARTMENT OF THE INTERIOR
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APPEAL FROM THE BUREAU OF OCEAN ENERGY MANAGEMENT

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Appellants,

vs.

Bureau of Ocean Energy Management,

Appellee.

DECLARATION OF FRANK KNAPP, JR.

1. My name is Frank Knapp, Jr. I make this Declaration on the basis of personal knowledge and am competent to testify to the matters stated in this Declaration, which are true and correct to the best of my knowledge, information, and belief.
2. I am President and CEO of the South Carolina Small Business Chamber of Commerce. I am also on the Board of the Business Alliance for Protecting the Atlantic Coast (“BAPAC”), which I co-founded in September of 2016 and presently serve as its President and CEO.

3. My VITA, attached, gives a detailed listing of my business experiences, publications, productions and accolades over the past four decades.
4. My responsibilities as President and CEO of BAPAC include all organizational activities including recruiting and managing its members, which are over 41,000 businesses and over 500,000 commercial fishing families.
5. BAPAC is the leading business organization working to ensure the long term health and economic vitality of the Atlantic seaboard through responsible stewardship of the coastal and ocean waters.
6. BAPAC and its members advocate for the protection of the Atlantic Coast from offshore oil/gas exploration and drilling.
7. BAPAC began when the business communities along the Atlantic Coast formed an alliance to advocate in our states and in Washington, DC against drilling and seismic testing.
8. I am familiar with commercial fishing businesses based upon my involvement with BAPAC and the South Carolina Small Business Chamber of Commerce. Commercial fishing businesses, including those in BAPAC, rely upon fish in the Atlantic Ocean to make income. If fish catch was reduced or eliminated, that would result in loss of income and, if it were substantial enough, the shutting down of commercial fishing businesses in BAPAC.
9. I am familiar with recreational businesses of marine-life sight-seeing tours for whales, dolphins, porpoises, seals and sharks based upon my involvement with BAPAC and the South Carolina Small Business Chamber of Commerce. These recreational businesses along the Atlantic, including those in BAPAC, rely upon healthy marine life populations

in the Atlantic Ocean in order to make income. If marine life were to be reduced or eliminated, that would result in loss of income, and if it were substantial enough, the shutting down of recreational businesses in BAPAC.

10. I am familiar with the tourism industry along the Atlantic based upon my involvement with BAPAC and the South Carolina Small Business Chamber of Commerce. Tourism along the Atlantic is dependent upon having healthy marine life and pristine, desirable beaches to draw tourists to the coastal region. If marine life were to be reduced or eliminated, that would result in a loss of tourism, and thus loss of income, and if it were substantial enough, the shutting down of tourism-dependent businesses in BAPAC.
11. I am familiar with the impacts of seismic airgun surveys, and have reviewed many resources on those impacts, including Menaquale, Andrew, *Offshore Energy by the Numbers* (Jan. 2015), available at <http://oceana.org/publications/reports/offshore-energy-numbers>; Shutak, Mike, "Study: fish numbers drop" *Carteret County News-Times* (Feb. 3, 2017), available at http://www.carolinacoastonline.com/news_times/article_12dbfe72-ea2d-11e6-b1b0-07f5ea79aab9.html; Barraclough, Breana, "Golden Bay whale stranding: Busting the myths" *Newshub* (Feb. 13, 2017), available at <http://www.newshub.co.nz/home/new-zealand/2017/02/golden-bay-whale-stranding-busting-the-myths.html>; OCEANA, *Fishing, Seismic Testing, and Offshore Drilling*, available at http://usa.oceana.org/sites/default/files/662/fishing_seismic_testing_offshore_drilling_fact_sheet_2016_2.pdf; Brown, William, BOEM, *Science Notes* (Mar. 9, 2015), available at <https://www.boem.gov/BOEM-Science-Note-March-2015/>; and OCEANA, *Scientific Testing for Offshore Oil and Gas Reserves*, available at

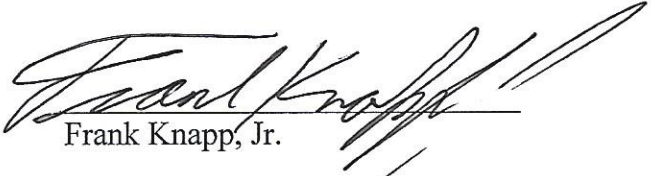
http://usa.oceana.org/sites/default/files/662/seismic_blasting_fact_sheet_march_2016_1.pdf.

12. I have reviewed the six permits that were denied by BOEM and are on appeal in this case.
13. Seismic airgun surveying, if it were permitted for any or all of those six companies, would result in the loss of income for many, if not all, members of BAPAC. If the seismic airgun surveying were allowed to continue for a long period of time, it would cause businesses in BAPAC to close because they would no longer be sustainable.
14. More specifically, the harms from seismic airgun surveying on different types of businesses in BAPAC would be as follows:
 - a. Commercial fishing would suffer from dramatic reduction in catches and thus income;
 - b. Recreational fishing rentals/sales would suffer from reduced demand due to displaced fish;
 - c. Hotels/vacation rentals would suffer from reduced bookings with marine mammal strandings on beaches and less demand from recreational fisherman;
 - d. Restaurants would suffer from increased costs for fresh fish and loss of customers;
 - e. Realtors would suffer from loss of sales and rentals due to fewer showings and less demand; and
 - f. Retail would suffer from loss of sales due to reduced number of tourists.
15. On November 14, 2016, myself and the rest of the BAPAC Board of Directors met with BOEM officials. In that meeting, myself and every other BAPAC representative had an opportunity to speak to BOEM officials. We provided industry-specific information

based on our various areas of expertise and places in the business community. We all asked for permanent protection of the Atlantic Ocean from offshore drilling activities, which include denying all pending seismic airgun blasting permits. We were thanked by BOEM for providing comments and encouraged to continue to stay active and engaged.

16. I also wrote two letters to President Obama on behalf of BAPAC, which were sent on October 27, 2016 and December 13, 2016. In these letters, BAPAC expresses its strong opposition to seismic airgun surveying in the Atlantic OCS. BAPAC also asked President Obama to deny all permits for any type of geological and geophysical (G&G) activities in the Atlantic Ocean, including seismic testing. These letters are signed by myself and hundreds of other members and supporters of BAPAC, in addition to the association itself.
17. On March 30, 2017, at 4:00 p.m., myself and other members of BAPAC met with BOEM Acting Director Walter Cruickshank and his staff, along with Jim Schindler of the Department of Interior. At that time Mr. Cruickshank advised us that the seismic companies had appealed their permit denials. That meeting was the first time that we had notice of the appeals. I am unaware of any press on the appeals and neither myself or BAPAC had any notice of the appeals until that meeting on March 30th.
18. Pursuant to 28 U.S.C. ' 1746, I declare, under penalty of perjury, that the foregoing is true and correct to the best of my professional opinion, knowledge and belief.

Signed on the 1st of May, 2017.


Frank Knapp, Jr.

VITA

Frank Knapp, Jr.
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Education

- * University of South Carolina, MA, Social Psychology, 1976
- * Indiana University of Pennsylvania, BA, Psychology, 1973

Professional Experience Summary

- 2017-Present President, CEO and Co-Founder, Business Alliance for Protecting the Atlantic Coast, Columbia, SC
- 2000-Present President, CEO and Co-Founder, The SC Small Business Chamber of Commerce (www.scsbc.org), Columbia, SC
- 1991-Present President, The Knapp Agency (Advertising/Public Relations, www.knappagency.com), Columbia, SC
- 1990- 1991 Partner, Bear, Mallard, Knapp and Pope (Political Consultants), Columbia, SC
- 1989-1990 Associate Director of Public Information, South Carolina ETV, Columbia, SC
- 1987-1989 Public Information Consultant, South Carolina ETV, Columbia, SC
- 1986-1987 Special Consultant, Div. of Public Safety Programs, Office of the Governor, Columbia, SC
- 1985-1986 Director of Marketing and Planning, Criminal Justice Management & Consulting, West Columbia, SC
- 1983-1985 Executive Director, Common Cause/South Carolina, Columbia, SC
- 1981-1983 District Manager, American Family Life Assurance Company, Columbia, SC
- 1979-1981 President, Frank Knapp & Associates, Columbia, SC
- 1977-1979 Criminal Justice Planner, Div. of Public Safety Programs, Office of the Governor, Columbia, SC
- 1976-1977 Director, Planning and Research, Lexington County Sheriff's Dept., Lexington, SC
- 1974-1976 Instructor, Psychology Department, University of South Carolina, Columbia, SC

Publications, Studies and Presentations

Knapp, Frank Jr. The effect of stress on quality of performance and alienation. Presented at the Eastern Regional Psi Chi Colloquium, Moravian College, 1973.

Knapp, Frank Jr. and McClure, Lawrence F. Quasi-experimental evaluation of a quality of life intervention. Journal of Community Psychology, 1978, 6, 280-290.

Knapp, Frank Jr. and Washington, Carey A. Study conducted on drunkenness offenders. Carolina Law, 1978, 28, No. 5, 44-47.

Knapp, Frank Jr. The practitioner's view. Panel discussion of the application of Social Psychology to Law, Society of Southeastern Social Psychologists Conference, University of Georgia, 1978.

Knapp, Frank Jr. Police education: A South Carolina perspective of the report of the National Advisory Commission on Higher Education for Police Officers. Carolina Law, 1979, 29, No. 2, 34-40.

Knapp, Frank Jr., Sharkley, James A., and Metts, James R. The effects of an increase in a county sheriff's department's patrol capability. Journal of Police Science and Administration, 1980, 8, 5-14.

Knapp, F., Mason, S.E., Metts, J.R., and Starkey, J.A. The Effects of a Residential Deputy Program on Perceived Law Enforcement Services. *Southern Journal of Criminal Justice*, Fall, 1980.

“The Other Side,” *Independent News of Irmo*, Weekly editorial column on politics and government. 1985-1986.

Knapp, Frank Jr., The Privatization of Public Prisons. *Business & Economic Review*, (College of Business Administration, University of South Carolina), 1986, 32, No. 2, 9-13.

“The Feasibility of an Alternative Facility for the Incarceration of DUI Offenders.” Study prepared for Greenville County, South Carolina, September, 1986.

Television Programs Produced

“Capitol View”, an S.C. ETV 30-minute, weekly public affairs program (1987-90) featuring taped one-on-one interviews with members of the South Carolina General Assembly.

“ALABAMA Presents: Concert Hugo”, a three-hour, live program featuring a concert by the country group ALABAMA along with interviews with the band, radio personalities, and prominent South Carolinians. The S.C. ETV broadcast was a fundraiser for the Hugo Relief Fund. The 1990 program generated \$51,000 in pledges and the highest ratings for any S.C. ETV program.

Radio Programs Produced and Hosted

Created and hosted weekday afternoon talk show, U Need 2 Know (WGCV-AM), Columbia, SC (February 2007-November 2016).

Hosted the “Small Business Forum”, a once a week, one-hour talk show (WCEO-AM), Columbia, SC (October 2003-December 2004).

Wrote and produced “The Jefferson Report”, a 90-second syndicated radio political commentary, Columbia, SC (1993-1999).

Video Documentary Produced

Produced, wrote, directed and funded 2003 video documentary “Sherman’s March: Final Revenge” (www.shermansrevenge.com).

Boards

Business Alliance for Protecting the Atlantic Coast (2016-present)

U.S. Small Business Administration District IV Regulatory Fairness Board Chair (2015–present).

American Sustainable Business Council Board of Directors Co-Chair (2012-present).

South Carolina Small Business Development Center Advisory Board (2012–present).

University of South Carolina Regional Small Business Development Center Advisory Board (2005-2010).

Common Cause-South Carolina, Chair (1981-1982).

Awards

U.S. Small Business Administration 2014 South Carolina Small Business Financing Advocate of the Year.

American Sustainable Business Council 2013 Partner of the Year.

Sierra Club-South Carolina 2011 Media Person of the Year.

PBS 1988 Advertising & Promotion Award for Institutional Promotion in a Large Market – “From Budget Cuts to New Building.”

Other

South Carolina Electric and Gas SCE&G Energy Efficiency Advisory Group (2011-present)

Leadership South Carolina, Class of 1985.

Chairman of Citizens' Committee on Drug and Alcohol Abuse in Lexington County Public Schools, 1984.

Exhibit 2

President Barack Obama
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

December 13, 2016

Dear Mr. President:

We, the Business Alliance for Protecting the Atlantic Coast (BAPAC), represent over 35,000 businesses and 500,200 commercial fishing families from Maine to Florida, and are writing to call on you to permanently protect the Atlantic from offshore oil and gas drilling, and to deny all Atlantic seismic airgun blasting permits.

BAPAC recognizes that offshore oil and gas activities are fundamentally at odds with our economies and our way of life. Our currently thriving East Coast businesses are reliant upon healthy ocean ecosystems and are inextricably tied to clean, coastal waters. Oil and gas exploration and development activities threaten the vibrant coastal environment that supports nearly 1.4 million jobs and contributes \$95 billion to the annual gross domestic product, mainly through tourism, commercial fishing and recreation.

We applaud your Administration's decision to remove the Atlantic from offshore drilling through 2022. Now it is time to give permanent protection to the Atlantic Coast.

If protected, the Atlantic coast has a lot to give this country for generations to come. We implore you to protect our businesses and our communities by permanently banning offshore drilling and denying seismic exploration off our coast. With the incoming administration's position on expanding dirty and dangerous drilling activities, it is more important than ever to instill this permanent protection to the Atlantic. Such offshore activities are a direct threat to our local economies, our bountiful ocean environment, and the very fabric of our coastal communities.

Sincerely,

Frank Knapp
President & CEO
South Carolina Small Business Chamber of
Commerce

Aimee Taylor
Executive Director
Virginia Beach Restaurant Association

Thomas Kies
President and CEO
Carteret County Chamber of Commerce

Marilou Halvorsen
President and CEO
New Jersey Restaurant and Hospitality
Association

Susan Jones
Executive Director
Ocean City Hotel-Motel-Restaurant
Association

Karen Brown
President & CEO
Outer Banks Chamber of Commerce

Vicki Clark
President & CEO
Cape May County Chamber of Commerce

Diana Burke
Executive Director
Virginia Beach Hotel Association

Vicki Clark
NJTIA, President
New Jersey Tourism Industry Association

Niaz Dorry
Coordinating Director
Northwest Atlantic Marine Alliance

Stephen Shaff
Executive Director
Chesapeake Sustainable Business Council

Michael Green
Executive director
Climate Action Business Association

Fran Teplitz
Executive Co-Director
Green America's Green Business Network

Jamee Haley
Executive Director
Lowcountry Local First

Karen Forget
Executive Director
Lynnhaven River NOW

Tonya Bonitatibus
Executive Director
Savannah Riverkeeper

Pete Beyda
Owner, CEO
7 Mile Brewery LLC

Rich Rollason
Owner
Advanced Pool Resurfacing

Craig Knowlton
Vice President of Business Development
Alder Energy Systems

Alice Timmons
Owner
Alice L Timmons, LMFT

Barry Ambrose
President
Ambrose Furniture Inc.

Marcia Kite
Owner
Aurora Wellness Services

Jill Bennett
President
B.Suits Inc.

Sandra Bundy
Broker-in-Charge
B&P, Inc.

Damon Scarpelli
Owner
Banks Channel

Wendy Ray
CFO
Beach Mart Inc

Millie Aven
Owner
Bike Barn Inc

Robert Steenrod
Owner
Billmae Cottage LLC

Chris Sermons

Owner
Bio-Way Farm

Julie Starke

Creative Director
Blue Mind Life

Heather Tallent

Owner
Blue Planet Scuba

Gaynel Marie McCary

Owner
Bodie Island Welcome Center

Brenda Quidley

President
Brendrick Inc

Randi Friel

Event Coordinator
Cape May Brewing Company

Bruce Rowland

CFO
Carolina Vapor Mill

Debbie Carter

Part owner and Sec./Treas.
Caughman Enterprises, Inc.

Russell Robinson

Owner
Channels

Charles Johnson

Owner
Charles Johnson

Joe Lotts

Owner
Charleston Outdoor Adventures

Robin Holton

Executive Director
Children @ Play Museum of the Outer
Banks

Christina Trapani

Owner
Christina Trapani Consulting

Christopher Galton

owner
Christopher Galton LPC

Alex Wolcott

CEO
Coastal NC Development

Lisa Toney

President
Coastside Realty, Inc.

Pamela Worsham

Owner
Cocoa Beach Parasail

Stephen Shaff

Founder
Community-Vision Partners, Benefit LLC

Duffy Pappas

Owner
Continental Divide

Paulette Sullivan

Partner
Cooper River Coffee

Stephen Cafiero

Owner
Coronation Sheet Metal Co.

Laura Habr

Co-owner/Vice President
Croc's 19th Street Bistro

Crystal Polston

Owner
Crystal Blue Productions

Judy Lotas

1st vice Chair
Dare County Democratic Party

Leda Zimmerman

Principial
dba RiverRun Media

Janis Markopoulos

Owner
Delmarva Board Sport Adventures

John DiGenni

Owner
DiGenni's Centennial Guest House

Rebecca Smith

Owner
Dirt Enterprise

Joel Michello

Owner
Dive Services Inc.

Lisa Abouassali

Member
DLS Properties, LLC

Robert Muller

Vice President
Don and Catharine Bryan Cultural Sereis

Donald Moorhead

Donald R Moorhead PA

George Kotarides

Owner
Doughs Boy's Pizza Restaurants

Geddes Dowling

President
Dowling Architects and Associates, Inc.

Amy Hawkins

Owner
Dr. Amy Hawkins ND LLC

Caroline Robinson

Owner
Drift

Amanda J Grondin

Owner/Operater
Duna Fisheries, LLC

William Galindo

CEO
Eco Realty Carolina

John Hawa

Treasurer
El Hawa Corporation

Jennifer Koontz

Owner, Creative Director
Epic Shutter Photography

Patricia Hitopoulos

Owner
Everyday Gourmet, Inc

Gina Perez

Owner
Fiddle Farms

Lucille Lamberto

Owner and Proprietor
Fiddler's Green Guest House

Laik ePEa

General Manager
First Colony Inn

Abby Carey
Owner
First flight adventure park

Richard Brendel
Owner
Flipper Finders

Heather Atwood
President
Food For Thought

Gary Beatty
Owner
Fresh Seafood USA

Paul Manning
Officer
Front Porch Cafe

Jeff Tant
Owner
Full Circle Gardens & Landscapes

William Galindo
CEO
Galgar LLC

Jane Ochsenbein
Full Partner
Gator Bait Adventure Tours

Jonathon Collins
Owner
Giant Slice Pizza

Angela Sanfilippo
President
Gloucester Fishermen's Wives Association

Ellin Goetz
President
Goetz+Stropes Landscape Architects Inc.

Richard Jones
Member/Manager
Good Hops Brewing LLC

Lacey DeBoer
GM
Grand Victorian Spring Lake

E Bergmann
Owner
Green Futures

James Williams
Owner
Hairoics, inc

Carl Hammond-Beyer
Vice President
Hammond-Beyer Health Center

Matt Pittaluga
Owner
Hank Sauce LLC

Elizabeth Hoffmier
LCSW, Owner
Harvest Moon Counseling

Kevin Scalia
President
Hatteras Island Boardsports

Barton Decker
Owner
Hatteras Island Surf and Sail Shop

Bill Holt
Manager
Holt-Cochran LLC

Dr. Kathy Clarke
Owner
Home by the Bay

Margaret Howell
Owner and President
Howell Consulting Group, L.C.

James Schwartz
Co-Owner
Independence Solar

Lisa Burdsall
Owner
Inspired Thrift Store

David Henderson
Owner
Integration Massage and Bodywork

Michael Mercker
Owner
iproducevideo

Ruth Fordon
Partner
Island Path

Amy Sawyer
Owner
Island Wellness Market

Pete Prioleau
Vice President/CFO
J W P Construction of SC, LLC

John Hegarty
President
J. Hegarty and Sons Inc

James Woodson
President
James C. Woodson DDS PA

Kristi Falco
Owner
Jolyn Mid-Atlantic LLC

Jerry Ravnitzky
Partner
Judith Ravnitzky Antiques

James Eaton
Owner
Just For the Beach Rentals

Kate Silvia
Owner
Kate Silvia Photography

Ryan Rhodes
Owner
Kayak Tours

Sarah Harrison
Co-owner
Kelley Gray's Garage

Kathy McCullough-Testa
President & CEO
KMT Consultants, Inc.

Joe Thompson
Owner/President
Koru Village Resort and Spa

Sally Murphy
President
La MER, Inc.

Leslie Hornfeck
Owner
Leslie's Vacation Rentals

Francee Levin
Owner
Levin Consultants

Meredith Loughlin
Co-owner
Lone Leaf Gallery and Custom Framing

Luke Hamlet

Owner
Long Beach Surf Shop

Phil Waters

Owner
Lowcountry Engineering Consultants, LLC

Banff Luther

Owner
Luther Marine Maintenance

Dave Stickle

President
M.H.E. Inc

Chad Coffin

President
Maine Clammers Association

M. Suzanne Stark

Owner
Making Waves Studio

Brian McDonald

President / General Manager
McAir, Inc. dba Outer Banks Heating & Cooling

Lynn Vandervoort

Co-owner
McNamaras Heating and Cooling

Kyle McGetrick

Owner
Mellow Militia, LLC

Mickey Baker

Owner
MERMAID'S FOLLY

Bianca Piccillo

Owner
Mermaid's Garden, Incorporated

Stephanie Dahlberg

Vice President
Midlands Neigbborhood Publications

Mary Erickson

Owner
Mineral Title Associates, LLC

Debra Moorhead

Vice President
Moorhead Mediation, LLC

Rick Baumann

Founder
Murrells Inlet Seafood

Nancy Grumman

Owner
Nancy Grumman Art Studio

Matt Gamble

Marine educator
Nature Adventures Outfitters

Carla Reynolds

President
NC 12 Realty

Michael Forgie

Owner
Next Step Connect

Jason Heilig

Owner/Manager
Noble Crescendo, LLC

Jerry Rivers

Environmental Scientist
North American Climate, Conservation and Environment(NACCE)

Allison Osmon

President
North State Landscaping and Lawn Care

Donald King

Owner
Ocean Blvd., LLC

Brian Klauser

Owner
OceanAir Sports

Brian Vaughn

Owner
Off The Hook Fishing Charters

Terri Gould

Owner
One of a Kind Gallery, Charleston SC

Rob Weltner

President
Operation SPLASH

Lisa Ortega

Owner
Ortega'z Grill

Marjorie Knapp

Owner/Director
Outer Banks Centre for Dance

Chris Hess

President
Outer Banks Intenet, Inc.

Michelle Smith

Owner
Outer Banks Yoga

Richard Bubnowski

Owner
Paddle Surf New Jersey LLC

Patsy Hancock

Owner
Pat Hancock Real Estate, LLC

Paul Sabadash

President
Paul Sabadash Real Estate Broker with Sun Realty

Peter Penniman

Owner
Penniman Apartments

Patricia Broom

President
Phoenix Restoration

Robby Roberts

Owner
Pure Board Shop

Lilias Morrison

President
Real Escapes, Ltd.

Mary Burkart

DVM MS
Roanoke Island Animal Clinic

Suzanne Woolard

Owner
Rooster's Southern Kitchen

Tamela Walter

Owner
Rover Tours, Inc.

Lucinda Hudgins

Owner
S& L Hudgins, Inc DBA Toomy's natural Foods Market

Mike Pennington

COO
Sabar sc LLC

David Sage
President
Sage Sailing, Inc.

Alex McCune
General Manager
Saint Waves Seafood and produce

Cheryl Mascioli
Owner
Salty Sea Studios

Sandra Sobanski
Owner
Sandyluvshells

David Facenda
Owner
Sea Swept LLC

Michael Dimin
Founding Director
Sea to Table

Malia Sanchez
Manager
Sealand Adventure Sports

Dave Smith
Owner
Senior Express Services

Dave Smith
Owner
Senior Express USA

Sean Cook
Co Founder
Shuckin Shack Oyster Bar

Paul Saucier
Owner
Soil Pros

Claire Conley
Manager
SoundSide Pools, Inc.

Tim Henson
Owner
Southern Coast Vacations

Larry Barker
Vice President
Southern Insurance Agency

Christine Maw
Owner
Special Events With Chris

John Spruill
Owner / Manager
Spruill Farm

Donna Farmer
Private Practice
Still Point Office

Benton Wislinski
Principal
Strategic Communication, LLC

Robert Walker
Publisher/Co-Owner
Suite P Inc.

Logan Alfred Raciti
Owner
Sunrise Surf & Skateboard Shop

Cody Leutgens
Owner
Surf City Surf School

Terra Pascaros
Director
TerraScapes Environmental

Glenn Kithcart

Innkeeper
The Bentley Inn

Steven Nelson

President
The Inn on Pamlico Sound

Michael Watkins

President
The Naples Beach Hotel and Golf Club

Morgan Mason

Co-Owner
The Outer Banks Real Estate Company LLC

Samantha Lock Brown

Owner
The Studio, Outer Banks

Charlie Garlow

Partner
TheGreenCommuter.com

Jane Fiedler

Social Media
Three Dog Ink

Matthew Notch

Owner/Operator
Top Notch Tree Care LLC

Isa Cohen

Marisa cohen
Tula adventure sports

Jonathan Floyd

Managing Partner
Twin Oaks Enterprises, Inc.

Jessica Moody

Co-Owner
Village Yoga

Vince Musi

Owner
Vincent J Musi

Trica Stopowski

Owner
wild about nature obx

Shelley Davis

Owner
Windswept Massage

Michele Darden

President
With a Twist Inc

William Gambrell

Owner
Tautogs Restaurant

Sheila Spencer

Owner
Sheila's Carolina Kitchen

Tony Ridgway

Owner
Cuisine Management, Inc.

Business Alliance for Protecting the Atlantic Coast

1717 Gervais Street, Columbia, SC 29201, 803-252-5733

October 27, 2016

President Barack Obama
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Mr. President:

We the undersigned businesses and organizations, representing over 12,000 businesses and 400,000 commercial fishing families, are writing to strongly oppose geological and geophysical (G&G) activities in the Atlantic Ocean, including but not limited to seismic airgun testing. Seismic airgun testing threatens our vibrant local coastal economies and is the first step towards dangerous offshore drilling.

Last month, Atlantic coast businesses came together to form a new coalition, the Business Alliance for Protecting the Atlantic Coast (BAPAC), with the mission of ensuring the long term health and economic vitality of the Atlantic seaboard through responsible stewardship of the coastal and ocean waters. The Alliance represents thousands of businesses and is opposed to seismic testing for oil and gas in the Atlantic. We support the Business Alliance for Protecting the Atlantic Coast.

In March 2016, the Department of the Interior removed the proposed Atlantic lease sale from the 2017-2022 Outer Continental Shelf Oil and Gas Leasing Proposed Program. With the Atlantic Ocean withdrawn from the current offshore drilling plans, seismic airgun testing is unnecessary, would significantly impact coastal economies—in particular our commercial fishing and tourism industries—and should not proceed.

Seismic airgun testing for subsea oil and natural gas deposits is an extremely disruptive activity in the ocean. A significant body of peer-reviewed science has demonstrated that seismic airgun testing can cause the catch rates of some commercial fish species to plummet, displace fish over large areas, and broadly disrupt the feeding and breeding behaviors of whales and other marine life. Seismic also invites offshore drilling and the industrialization of our coast. Communities along the Atlantic coast rely on healthy ocean ecosystems to support the nearly 1.4 million jobs and to continue to contribute \$95 billion to the annual gross domestic product, mainly through fishing, tourism and recreation.

Although the Atlantic Ocean is protected from oil and natural gas drilling for now, G&G exploration using seismic airgun testing continues to threaten productive fisheries, marine organisms, and ocean ecosystems. As business owners and business organizations concerned about the economies of our

Atlantic Coast states, we ask that you protect our ocean resources from unnecessary harm and deny all current and future G&G oil and gas permits in the Atlantic Ocean.

Sincerely,



Frank Knapp Jr.

South Carolina Small Business Chamber of Commerce

Business Organizations:

Climate Action Business Association (CABA)
Cape May County Chamber of Commerce
Carteret County Chamber of Commerce
Chesapeake Sustainable Business Council
Green America's Business Network
Gullah/Geechee Sea Island Coalition
Northwest Atlantic Marine Alliance
Outer Banks Chamber of Commerce
Savannah Riverkeeper
South Carolina Small Business Chamber of Commerce
The Duck Merchant's Association

Full List:

7 Mile Brewery, LLC
A1 Taxicab LLC
AIL
Alice L Timmons,, LLC
Aurora Electric Inc
B&P, Inc.
Balanced meridian
Beach Mart Inc
Berkshire Hathaway HS Fox & Lazo
Better World Club
BG Financial Advisors, LLC
Bob construction LLC
Borough of Stone Harbor
Brauer Holdings, Inc.
CABA
Cape May Brewery
Cape May County Chamber of Commerce
Cape Publishing, Inc.
CAROLINA COUNTERTOP
Carolina Designs Realty, Inc.

Carteret County Chamber of Commerce
Charleston Shirt Factory
Chesapeake Sustainable Business Council
COMPACT II, INC.
Corolla Wild Horse Fund
CPC Industrial
Croc's 19th Street Bistro
Dammit.1050 dba HyperCyb.org
Dare County Democratic Party
Decka Inc
Dirt Enterprises
Dog Friendly Billmae Cottage
Earth Friendly Products
eCommerce Outdoors
Eileen Fisher, Inc.
Errol for Avon
Feather Your Nest
Fine D. Zine
FLORIDA OBX, LLC
Gaiss' Market
Global Urban Solutions
Green America's Green Business Network
Greenvest
Gullah/Geechee Sea Island Coalition
Half Moon Outfitters
Hammond-Beyer Health Center
HEA LLC
Home consumers
Hornsby computer
HotelGuides.com
Ibis Communications
Inland Shrimp Company/FreshSeafoodUSA
JCEDC
Just for the beach rentals
LaMER, Inc.
Leith Hall Bed and Breakfast
Loftis Timber
Lowcountry Engineering Consultants, LLC
Lowcountry Estuarium
Maguire Therapy Services,inc.
mako mikes restaurant
McMahon Agency Inc.
Meyers Management, LLC
Midgette Auto Supercenter

Midlands Neighborhood Publications
MWJ Real Estate Solutions
Nature Adventures Outfitters
Northwest Atlantic Marine Alliance
OceanFirst Bank
Outer Banks Centre for Dance
Outer Banks Chamber of Commerce
Outer Banks Heating & Cooling
Outer Banks Paddleboard
Outer Banks Realty Group, LLC
Outer Banks Voice
Pawleys Island Pharmacy of Litchfield
Phoenix Restoration
Plants As Art
Poseidon Ventures, Inc.
Project Green Light, Inc
Property Management
Real Escapes Ltd
Rover Tours, Inc.
Savannah River Keepers
Savannah Riverkeeper
Savannah Riverkeeper
SC Lowcountry Tourism Commission
Sea Mountain Spirits, Inc.
Sea Swept LLC & The Duck Merchant's Association
ServiceMaster of the Shore Area
site-image, llc
SolVen Hospitality
SoundSide Pools, Inc.
South Carolina Small Business Chamber of Commerce
Stockton Inns
Sun Realty Corolla NC
Surf Song Beach Resort Rental Program
SUTHERLAND COMPANY
The Inn on Pamlico Sound
Third Avenue Partners
Town of Nags Head
Town of Nags Head
Tycoon Tackle, Inc.
Unruly
Visiting Angels of Northeastern NC Inc
Window Genie of South Jersey
Wise Brown Enterprises
Wright Consulting & Training, Inc.