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June 27, 2024

Congressman Cliff Bentz Chair Subcommittee on Water, Wildlife and Fisheries 1522 Longworth House Office Bldg. Washington, D.C. 20515 Congressman Jared Huffman Ranking Member Subcommittee on Water, Wildlife and Fisheries 1522 Longworth House Office Bldg. Washington, D.C. 20515

Re: H.R. 6814, Marine Fisheries Habitat Protection Act - OPPOSE

Dear Chair Bentz and Ranking Member Huffman:

On May 17, 2024 and May 29. 2024, respectively, the Boards of Directors of Get Oil Out! (GOO!) and Santa Barbara County Action Network (SB*CAN*) voted to opposed H.R. 6814. We are submitting this letter to your Committee urging that you not pass this bill out of Committee.

Get Oil Out! (GOO!) was founded in the aftermath of the tragic 1969 oil spill that devastated Santa Barbara's beaches, as well as its local tourist economy. In addition to monitoring new proposals for oil development, as well as existing projects, GOO! reviews and takes positions on legislation it deems of importance to our mission. SBCAN is a countywide grassroots organization that works to promote social and economic justice, to preserve our environmental and agricultural resources, and to create sustainable communities.

GOO! and SBCAN are very concerned about H.R. 6814 for the following reasons:

This proposed legislation would disrupt existing federal law and regulations, impede ongoing decommissioning efforts to remove oil and gas infrastructure from the Pacific Coast, and hinder the implementation of existing California state law, which provides a balanced approach to creating artificial reefs from such infrastructure. There are already a number of oil facilities in the Santa Barbara Channel that are well into the decommissioning process which would be undermined.

The system set up under H.R. 6814 would establish a system that favors leaving oil and gas infrastructure in place, in contradiction to promises made for full removal when many of these facilities were approved. Leaving these facilities in place will result in significant risks, including hazards to navigation and conflicts with commercial fisheries and marine wildlife, not to mention potential leaching of toxic chemicals from abandoned structures.

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Comprehensive decommissioning activities, ensuring the removal of platforms, pipelines, and other facilities associated with oil and gas leases are already mandated in federal law and federal regulations, making H.R. 6814 unnecessary. This bill is also inconsistent with approved leases and permits for offshore oil and gas facilities which require safe and environmentally sound decommissioning in compliance with all applicable laws and regulations. H.R. 6814 would disrupt federal law, regulations, and lease conditions currently in place.

The federal Bureau of Safety and Environmental Enforcement (BSEE) has already set a course for decommissioning of oil and gas infrastructure on the Pacific Outer Continental Shelf and completed a Programmatic EIS, an extensive document that examined at length various options for decommissioning. The PEIS and subsequent Record of Decision selected complete removal of oil and gas infrastructure as the Preferred Alternative to ensure that no infrastructure could remain on the Pacific Outer Continental Shelf seafloor that could later interfere with navigation, commercial fisheries, future oil and gas operations, and other users.

Finally, the State of California Marine Resources Legacy Act addresses the issues set forth in HR 6814. It provides a partial removal option for platforms that are decommissioned off the coast of California and requires site-specific studies on the impacts and benefits of various decommissioning options and addresses the issue of liability of structure left on the seafloor, including an indemnification provision.

Again, it is for all of these reasons that we **urge you to oppose H.R. 6814**. This bill disregards established federal and state laws and jeopardizes the marine environment and coastal communities.

Thank you for your consideration.

Sincerely,

Michael Lyons

President, GOO!

Co-Executive Director. SBCAN