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NATIONAL OCEAN INDUSTRIES ASSOCIATION

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RE: Request for Extension of Comment Period

Gulf of Mexico Outer Continental Shelf Lease Sale Draft Supplemental

Environmental Impact Statement 2018 MMAA10400

Docket ID: BOEM-2017-0001

The National Ocean Industries Association (NOIA) respectfully requests that the Bureau of Ocean Energy Management (BOEM) extend the 45-day comment period on the proposed *Gulf of Mexico Outer Continental Shelf Lease Sale Draft Supplemental Environmental Impact Statement 2018* (the "Draft SEIS") to 75 days (an additional 30 days).

NOIA is the only trade association representing all segments of the offshore industry and has nearly 300 member companies with an interest in the exploration and production of both traditional and renewable offshore energy resources. NOIA's mission is to secure reliable access and a fair regulatory and economic environment for the companies that develop the nation's valuable offshore energy resources in an environmentally responsible manner.

NOIA recognizes the Bureau's need to issue the Draft SEIS in order to provide business critical services supporting oil and natural gas development; however, we would appreciate more time to review the document in order to provide informed, substantive feedback.

An extension of the comment period is justified given that BOEM has included substantial new information in the Air Quality section of the document. In fact, BOEM has stated in the Draft SEIS that, "...since this air quality analysis was completed for the Final 2017-2022 GOM Multisale EIS and did not have the benefit of public review, the complete analysis is included in this Supplemental EIS for public review and comment. BOEM looks forward to receiving relevant comments on the methods used in air quality modeling and the resulting analyses." Given the complexity of the air quality information included in the Draft SEIS, and the fact that this is the first opportunity for the public to review and comment on the air quality analysis, we

¹ Bureau of Ocean Energy Management, *Gulf of Mexico OCS Lease Sale – Draft Supplemental Environmental Impact Statement 2018*, Section 4.1, pp. 4-14.

believe additional time is warranted to generate relevant comments to benefit BOEM's final SEIS.

We appreciate your consideration of this request for an extension. If you have any questions or if additional information is needed, please contact me at (202) 347-6900 or at jvorberger@noia.org.

Yours truly,

Jeffrey Vorberger

Vice President, Policy & Government Affairs

National Ocean Industries Association