



March 21, 2023

The Honorable Jeff Merkley  
Chair  
Senate Interior Appropriation  
S-128, The Capitol  
Washington, DC 20510

The Honorable Lisa Murkowski  
Ranking Member  
Senate Interior Appropriations  
S-128, The Capitol  
Washington, DC 20510

The Honorable Mike Simpson  
Chair  
House Interior Appropriations  
H-307 The Capitol  
Washington, D.C. 20515

The Honorable Chellie Pingree  
Ranking Member  
House Interior Appropriations  
H-307 The Capitol  
Washington, D.C. 20515

Dear Chair Merkley, Ranking Member Murkowski, Chair Simpson, and Ranking Member Pingree:

We write today to ask for your leadership in safeguarding valuable marine fisheries habitat in the Gulf of Mexico. Energy infrastructure on the Outer Continental Shelf (OCS) has boosted fish, coral, and other marine animal productivity for more than three quarters of a century by providing an otherwise absent hard substrate on which to colonize and begin developing local reef ecosystems. Over time, these structures have been the catalyst for teaming communities of fish and marine life that serve as incredibly important destinations for recreational anglers, divers, and commercial fishermen alike.

The importance of the OCS platforms and supporting infrastructure on enhancing marine ecosystems is well documented. For instance, a March 2020 report funded by the Bureau of Ocean Energy Management and the Bureau of Safety and Environmental Enforcement found that 45% of the estimated greater amberjack stock in the Gulf is likely associated with OCS platforms and infrastructure. In addition, the report stated that "Platform removals are likely having, and will likely have, significant adverse impacts on local fisheries, especially those offshore Louisiana and Mississippi." This is particularly the case with greater amberjack where the most recent stock assessment indicated the stock is currently in a depleted state.

Unfortunately, less than 25% of these original structures remain, and we fear that without specific instructions by Congress to allow operators the necessary time to voluntarily enter into the Rigs to Reefs

Program, many more of these important habitats for recreationally and commercially important fish and marine animals will be unnecessarily lost in the next few years. To encourage the preservation of marine habitat and important access for saltwater anglers and commercial fishermen, we respectfully request that you incorporate appropriations report language similar to that below:

*Rigs to Reefs.—The Committee strongly supports the Rigs to Reefs program in cooperation with the States and NOAA for its habitat conservation value for fish, corals, and other marine animals. The Bureau of Safety and Environmental Enforcement is encouraged to utilize the program to the maximum extent possible and pause any decommissioning orders or civil penalties for entities that declare and demonstrate a desire to participate in the Rigs to Reef program and can exhibit that any such platform: (i) is not a risk to marine navigation or the environment; and (ii) that any oil and gas wells connected to the offshore infrastructure have been plugged and abandoned or otherwise secured in a safe manner.*

Under existing regulations, once an oil or natural gas platform operating on the OCS is no longer producing oil or gas, companies have one year to remove the structure. However, due to the planning required and the coordination with state fish and wildlife agencies, it is extremely difficult to effectuate the required planning, permits and agreements to donate a platform or other structure to the Rigs to Reefs program in the one-year time frame. While Interior has the authority to grant additional time to remove offshore platforms and structures, energy producing companies are often forced to simply comply with the expedited removal in the absence of the time and resources necessary to pursue a potential donation to state reefing programs.

Since the advent of offshore oil and gas production, over 70 years ago, nearly 7,000 platforms have been installed, yet only around 1,300 of these structures remain. However, these remaining structures have become an essential part of the ecosystem, providing important marine habitat vital to recreational and commercial fishing along the Gulf of Mexico and contributing significantly to the region's economy. From the recreational fishing perspective alone, there are approximately 2.6 million anglers in the Gulf who contribute \$13.5 billion to the annual economy and create more than 100,000 jobs.

In closing, oil and gas platforms and offshore assets cost millions of dollars to install, and once they are removed, they will be lost forever. Providing the maximum opportunity to safely repurpose these platforms in the Rigs to Reefs program will ensure the Gulf's marine ecosystems and economy will not be negatively impacted. We urge you to include this language in the Senate and House Interior Appropriations Report language.

Sincerely,

American Sportfishing Association  
Bonefish & Tarpon Trust  
Center for Sportfishing Policy  
Coastal Conservation Association  
Congressional Sportsmen's Foundation  
International Game Fish Association  
Theodore Roosevelt Conservation Partnership