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March 8, 2018

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Ms. Kelly Hammerle  
National Program Manager  
Bureau of Offshore Energy Management (BOEM)  
45600 Woodland Road  
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Sterling, VA 20166

Submittal Via: <https://www.boem.gov/National-Program-Comment/>

RE: Comments on the 2019-2024 Draft Proposed Outer Continental Shelf Oil and Gas Leasing Program and Notice of Intent to Prepare Programmatic Environmental Impact Statement (BOEM-2017-0074)

Dear Ms. Hammerle:

The Georgia Conservancy appreciates this opportunity to submit this comment on the Draft Proposed Outer Continental Shelf (OCS) Oil and Gas Leasing Program (DPP) and Notice of Intent to Prepare a Programmatic Environmental Impact Statement (PEIS) in the Atlantic Ocean off Georgia's coast. Since 1974, the Georgia Conservancy has played a major role in opposing leasing for offshore drilling each time that a new energy policy brings forward such consideration. This letter outlines a heightened level of concern with this round of rushed, overly broad submittals by Bureau of Ocean Energy Management (BOEM).

Our comments related to oil and gas leases center primarily on the numerous ways leases would damage critical ecosystems and disrupt the lives and economy of our coastal residents. We hope that in this round of assessment BOEM will use sound science. It is critical that the federal review process not be hurried for the sake of a short-term energy policy brought by a change in Administration.

The Georgia Conservancy is a statewide conservation organization that works to develop solutions to protect Georgia's environment through advocacy and collaboration on water, air, land and marine conservation issues. Founded in 1967, we are one of Georgia's oldest conservation organizations and we have a long history of advocating for coastal protection.

The comments and questions in this letter should be considered specific to the Georgia Coast, which is part of the South Atlantic Planning Area. The Georgia Conservancy stands with other coastal municipalities, local businesses and environmental organizations to call into question if South Atlantic Area leases are justified.

We respectfully request a waiver from offshore drilling leases (OCS Leasing Program) for Georgia similar to that under consideration for Florida. The early discussion of such a waiver, just days after the issuance of the DPP, focused the concern in Georgia on home rule and federal consistency issues that are held very dear as values in our state political system.

Taking into consideration the environmental and economic risks of offshore oil and gas exploration and the incursion of mainland infrastructure into ecologically-sensitive areas and centers of tourism, a bipartisan group of coastal elected officials in Georgia have stated their opposition to the proposed leasing program. In our opinion, no other state has more to lose in terms of its natural beauty than does our incredible Georgia.

Our Coastal Policy states that the Georgia Conservancy envisions *a healthy resilient and diverse coastal ecosystem that can endure natural and human disturbances, continue to perform its functions, and support self-sustaining populations of native fish, birds, wildlife and plants*. Our federal agencies and elected officials need to recognize that the Georgia has done a remarkable job protecting our coastal assets for the benefit of our citizens, and that the largest functioning marsh estuary on the East Coast should not be jeopardized by this leasing program.

Relative to the Proposed Program, under Section 18 of the OCS Lands Act, BOEM should provide specific consideration of the balance between the potential for environmental damage, the potential for the discovery of oil and gas, and the potential for adverse impact on the coastal zone. This assessment should be based on a compilation of comprehensive data sets which address Georgia-specific features of our nearshore and coastal environments. A unique aspect of this analysis should be Georgia's extensive estuaries, which include one third of the East Coast's remaining salt marshes.

BOEM should give high priority to excluding the following from the Atlantic, planning areas from the proposed 2019-2024 Outer Continental Shelf ("OCS") Oil and Gas Leasing Program:

- Gray's Reef National Marine Sanctuary along with a buffer zone, and
- Critical Habitat for the Northern Atlantic Right Whale, Southeastern U.S. Calving Area as defined by NOAA (2016).

For scoping of the Programmatic Environmental Impact Statement (PEIS), we recommend the following:

1. The BOEM should consider a “no action” alternative to exclude new lease sales off the Georgia coast.
2. For the fishery and tourism economy in Georgia, the PEIS should include research to determine the social, economic and ecological baseline of OCS areas under consideration to assess the potential impacts of resource development.
3. For the Right Whale and other endangered or threatened species, the PEIS should consider the impacts of oil spills, operations and increased boat traffic on marine life. Georgia’s coast is home to various endangered marine species. These include the Northern Atlantic right whale, one of the most endangered whales in the world, with only about 450 whales remaining.
4. For our extensive Georgia marshes and estuaries, it is important to provide analysis of single disaster (e.g. Deepwater Horizon) and cumulative-effect scenarios for offshore drilling development and operations.

The Georgia Conservancy does not believe that allowing oil and gas drilling in Georgia’s offshore waters is in the best interest of our coastal communities, state or nation. The risks far outweigh the reward. We appreciate the opportunity to voice our concerns in hopes that you will use sound science and economic data to show that it does not make sense to lease areas off the Georgia coast for oil and natural gas drilling.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "CH. McMillan, III". The signature is written in a cursive, somewhat stylized font.

Charles H. McMillan, III  
Coastal Director, Georgia Conservancy