June 6, 2025

Ms. Kelly Hammerle
National Program Manager
BOEM 45600 Woodland Road
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Sterling, VA 20166

MILES
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Brunswick, GA 21520
www.OneHundredMiles.org
912.264.4111

Re: Response to Request for Information: Preparation of the 11th National Outer Continental Shelf Oil and Gas Leasing Program

Dear Ms. Hammerle,

One Hundred Miles appreciates the opportunity to engage in the federal process of evaluating possible areas of the Outer Continental Shelf (OCS) for potential oil and gas lease sales to meet national energy needs (National OCS Program). One Hundred Miles is a non-governmental, nonprofit organization focused on preserving and protecting Georgia's 100-mile coast through education, advocacy and community engagement. Our interest in engaging in federal decision-making is to ensure the long-term protection of the significant cultural, historical and natural resources found throughout Georgia's coast and marine environments.

One Hundred Miles urges the administration to uphold the 10-year moratorium on oil and gas development in the Atlantic Ocean near the South Atlantic states. That moratorium was signed by President Donald Trump in 2020 and prohibits leasing of federal offshore lands in Florida, South Carolina, and Georgia from 2022 to 2032.[1] The moratorium was enacted because of strong opposition from coastal communities and elected officials. There are also substantial potential conflicts with military operations, commercial uses of the ocean (e.g., commercial fishing, and tourism), and current market conditions.[2]

Leasing areas in the Atlantic Ocean for offshore oil and gas development puts all coasts at risk. Drilling off the Atlantic Coast has not taken place in over 40 years, and offshore oil and gas production has never taken place. Such a significant shift in federal policy would risk the fragile and unique ecosystems that make the region special. Because of the many adverse impacts oil and gas development would have on the natural resources that make the region so unique, we urge you to exclude Georgia and the South Atlantic Planning Area from the 11th National OCS Program.

[1] https://apnews.com/article/water-quality-north-carolina-florida-elections-environment-c98482gef78b964cc7d09bf2e0e1ab34
[2] https://www.doi.gov/pressreleases/interior-department-announces-next-step-offshore-oil-and-gas-leasing-planning-process

As requested in the Federal Register on May 1, 2025, One Hundred Miles respectfully submits the following data/information, comments, and suggestions regarding national and regional information that will be useful in formulating the National OCS Program. Pursuant to section 18 of the OCS Lands Act, we have organized our information following the factors required to be considered by the agency.

(1) National energy needs for the period relevant to the new National OCS Program, in particular, the role of OCS oil and gas leasing and resulting exploration, development and production activities in achieving national energy policy goals: the economic, social, and environmental values of the renewable and nonrenewable resources contained in the OCS; and the **potential impact of oil and gas exploration and development on other OCS resource values and the marine, coastal, and human environments.**

1.A.) OCS development conflict with our local economies

Offshore oil and gas development conflicts with many of the drivers of coastal Georgia's local economies, especially tourism, fisheries and the military operations in coastal Georgia. In 2012, Georgia's ocean economy supported nearly 24,000 jobs, provided residents with nearly $600 million in wages, and contributed more than $1.2 billion to our state's economy. The tourism sector alone contributed more than $518 million to Georgia's economy, and was responsible for employing nearly 15,000 Georgians. The fishing and seafood industry also made a significant impact on the ocean economy employing almost 1 million people and contributing $130 million to the state's economy.[3] (See Attachment 1 - "Center_for_the_Blue_Economy_Atlantic_Offshore_Drilling.pdf").

1.B.) Human uses of OCS and nearshore areas

The Nature Conservancy (TNC) compiled a Coastal Georgia Human Use Mapping Project.[4] By conducting several mapping exercises with Georgia citizens and researchers, TNC collected information on recreational use areas in coastal Georgia's estuarine, nearshore, and offshore waters. The goal of the project was to collect information on where people go fishing, boating, diving, paddling, eco-touring, and birding, and how often they go to these areas.

TNC's product includes a series of maps that BOEM should use to gauge the level of use and utility of Georgia's coastal, nearshore and offshore environment to the citizens who are dependent on these systems for employment and recreation.

(2) Existing information concerning geographical, geological, and ecological characteristics of the OCS planning area and near shore and coastal environments;

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[3] Charles Colgan, *The Economic Effects of Outer Continental Shelf Oil and Gas Exploration and Development in the South Atlantic Region: Issues and Assessment*, The Middlebury Institute of International Studies at Monterey: Center for the Blue Economy (Dec. 2015)

[4] http://tnc.maps.arcgis.com/apps/MapJournal/index.html?appid=1a48c0b3afdb49ec8edd136a1d4bbbe4

2.A) Significant Species found off Georgia's coast

The Georgia coast provides refuge, foraging and nesting/calving areas for a great number of species that are considered endangered, threatened or of significant concern. Following the list of species, some additional contact information and/or references are included.

2.A.1) Marine mammals and pelagic birds

A great number of animals depend on healthy and un-fragmented OCS habitats for their well-being and survival. These include, but are not limited to the following endangered or threatened species:

- North Atlantic right whale
- West Indian manatee
- Leatherback sea turtles
- Loggerhead sea turtles
- Northern Gannet
- Common Loon
- Black Scoter
- Lesser Scaup
- Shearwaters and Petrels
- Red Phalarope

Oil and gas development off the Georgia coast will lead to increased noise and activity in our OCS that will disrupt these animals' behavior and could lead to their species being further endangered. As such, BOEM must prevent any disruption to the migratory patterns and marine habitats that will be affected by offshore oil and gas development.

The State of Georgia Department of Natural Resources (DNR) Wildlife Resources Division (WRD) is charged with conserving, enhancing and promoting Georgia's wildlife resources, including game and nongame animals, fish and protected plants. The Nongame Conservation section of Georgia WRD conducts research and surveys on a wide variety of nongame wildlife, identifies critical habitats and implements species and habitat restoration programs. Georgia DNR-WRD Nongame Conservation section coastal office has collected and compiled a great deal of information on critical habitats, migratory corridors of the marine animals and pelagic bird species.

- Contact Mr. Timothy Keyes, DNR WRD Nongame Conservation Section Coastal Manager - 912.222.0424

2.A.2) Sea turtles

Endangered sea turtles nest and utilize Georgia's 100-mile coastline and offshore waters every year. Five species of sea turtles are found in the waters off Georgia's coast and all five are listed under the Endangered Species Act (ESA). The loggerhead sea turtle is the only species to nest regularly and in large numbers on our beaches every year from May-August. The other four species including the hawksbill, Kemp's ridley, green, and leatherback primarily use Georgia's coast for food, shelter, and as a migration corridor.

In 2022, loggerhead nesting peaked at 4,071 nests – the most since comprehensive surveys on all of Georgia's barrier island beaches began in 1989. The total dipped to 3,431 nests in 2023 and reached just over 2,490 last year.[5]

- Contact Ms. Catherine Ridley, St Simons Sea Turtle Program – 912.222.3140

2.A.3) Nesting and Foraging Birds

In addition to the marine habitats critical for the well-being of Georgia's sensitive marine species, The administration must also consider the impact energy development will have on the avian species dependent on our pristine beaches and marshes as nesting and foraging habitats. Currently, twelve (12) species of birds nest on the beaches and dunes of coastal Georgia, including the following five (5) protected species that nest exclusively on our beaches:

- Wilson's plover
- American Oystercatcher
- Gull-billed tern
- Black skimmer
- Least tern

A significant function of our expansive saltmarsh system is the support of saltmarsh nesting birds. Several species are considered threatened and special actions are being taken to ensure they have the habitat necessary to provide them with food and shelter during migration seasons. These include, but are not limited to:

- Least bittern
- Tricolored heron
- Seaside sparrow
- Worthington's marsh wren
- Clapper rail
- Ibis (glossy and white)
- Snowy egret
- Little blue heron
- Saltmarsh sparrow
- Bald eagle

Many federal and state listed species of birds use Georgia's 100-mile coast and our pristine marsh and intertidal areas as critical foraging habitat. Federally listed species and species of concern include:

- Wood stork
- Piping plover
- Red knot
- Marbled godwit
- Whimbrel

The Georgia Shorebird Alliance,[6] a collection of bird researchers and managers that work to protect shorebirds and shorebird habitats in Georgia, worked collaboratively to designate the Georgia Barrier Islands as a "landscape of

[5] https://georgiawildlife.com/first-loggerhead-sea-turtle-nest-2025-found-jekyll-island#:~:text=In%202022%2C%20loggerhead%20nesting%20peaked,just%20over%202%2C490%20last%20year

[6] https://www.facebook.com/groups/GeorgiaShorebirdAlliance/

hemispheric importance" through the Western Hemispheric Shorebird Reserve Network (WHSRN).[7] The designation is based on the statistically significant number of shorebirds that use and depend on the coastal habitats of coastal Georgia. An analysis of the number of shorebirds that use Georgia's coast was conducted to support the nomination (See Attachments 2: "WHSRN_Hatt narrative – FINAL.pdf")

- Contact Mr. Timothy Keyes, DNR WRD Nongame Conservation Section Coastal Manager - 912.222.0424

2.B) Protected habitats of Georgia's coast

Georgia's coast and offshore region are home to a number of protected habitats. These designations are afforded because of the protected status of a particular endangered species[8] or the unique nature of the designated area.

- Gray's Reef[9] – Located 17.5 miles east of Sapelo Island, Gray's Reef is one of the largest live-bottom reefs in the Southeastern United States. The area secured the designation of National Marine Sanctuary in 1981 because of its extensive outcroppings of Pliocene-aged limestone, allowing for sponges, coral, barnacles and other marine lifeforms to hold fast. In 1998, Gray's Reef, along with all other designated national marine sanctuaries, were withdrawn indefinitely from being eligible for lease sales for the purpose of the oil and gas development.[10]

- North Atlantic right whale critical habitat[11] – In 1994, The National Marine Fisheries Service (NMFS) of the National Oceanic and Atmospheric Administration (NOAA) designated the critical habitat for the North Atlantic right whale, and expanded the critical habitat in January 2016[12] to include all waters off the coast of South Carolina, Georgia and Florida. the remaining 100 females migrate to our coast as their calving grounds. The right whales winter in the Southeast coastal waters and are usually found in waters to a depth of 25 meters off the Georgia and Florida.

- Loggerhead Sea Turtle critical habitat[13] – The loggerhead sea turtle is an endangered species that nests on the Georgia coast. As such, a portion of the Georgia coast is designated as critical habitat for the sea turtles. The designated area includes coastal waters out one nautical mile from the beaches of Tittle Tybee, Wassaw, Ossabaw, St. Catherines, Blackbeard, Sapelo, Little Cumberland, and Cumberland Islands.

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[7] http://www.whsrn.org and https://whsrn.org/whsrn_sites/georgia-barrier-islands/
[8] "Under Section 7 of the Endangered Species Act, all Federal agencies must ensure that any actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of a listed species, or destroy or adversely modify its designated critical habitat." http://www.nmfs.noaa.gov/pr/species/criticalhabitat.htm
[9] https://graysreef.noaa.gov
[10] Hagerty, Curry L. (2011). "Outer Continental Shelf Moratoria on Oil and Gas Development." Report by the Congressional Research Service. https://fas.org/sgp/crs/misc/R41132.pdf
[11] http://www.nmfs.noaa.gov/pr/species/mammals/whales/north-atlantic-right-whale.html
[12] Federal Register, Vol 18, No. 17 Part IV, Dept. of Commerce, NOAA 50 CFR Part 226 - January 27, 2016 http://sero.nmfs.noaa.gov/maps_gis_data/protected_resources/critical_habitat/documents/81_fr_4838_fr_rev_crit_hab.pdf
[13] http://www.nmfs.noaa.gov/pr/species/turtles/criticalhabitat_loggerhead.htm

- Piping Plover critical habitat[14] – The piping plover is a small shorebird that is currently listed as endangered by the U.S. Fish and Wildlife Service. The plover's protected habitat includes sixteen (16) distinct areas of the Georgia coast's due the importance of the areas for migrant and overwintering Piping Plover.

2.C) Significant natural areas of Georgia's coast

Georgia's coast is home to a great number of ecologically and historically significant areas subject to impacts of energy-related activities in the OCS. The natural areas, historical sites and critical barrier islands listed below are, to some degree, protected and should be afforded special attention. Contacts for the area managers are also included should the administration need more data or information.

2.C.1) Natural Areas

The following areas are managed by the state and are under some form of protection because of their ecological and historical value.

- Parks and Historic sites – Federal and State agencies manage historic sites throughout Georgia's 100-mile coast. These permanently protected areas are significant to the local economy and are based in a rich history and document our culture.
    - Fort Frederica National Monument
    - Fort King George State Historic Site
    - Hofwyl Broadfield Plantation State Historic Site
    - Fort Pulaski National Monument
    - Gullah Geechee Corridor
    - Reynolds Mansion on Sapelo Island State Historic Estate
    - Old Fort Jackson – home of the Coastal Heritage Society

    - Fort Morris Historic Site - one of the few Revolutionary War battlefields
    - Crooked River State Park – situated on the inter-coastal waterway and is home to historical areas such as ruins of a tabby mill, built around 1825 and later used as a starch factory during the Civil War

    - Contact Mr. Robert Wilson, Georgia DNR Parks Coastal Regional Assistant Manager – 912.262.3181

- Natural Areas managed for Nongame Wildlife – Georgia DNR WRD manages quite a lot of "Natural Areas" along the coast. These areas are protected because of the high quality or prime location for wildlife habitat. They include: Little Tybee Island, St. Catherine's Bar, Pelican Spit, Egg Island Bar, Satilla Marsh Island.

    - Contact Mr. Timohty Keyes, DNR WRD Nongame Conservation Section Coastal Manager – 912.222.0424

- Wildlife Management Areas – Wildlife Management Areas (WMAs) are important areas for wildlife habitat and recreation. The Georgia DNR WRD manages 180,000 acres WMAs, including properties in the following areas: Sapelo Island,

[14] https://www.fws.gov/plover/facts.html

Ossabaw Island, Richmond Hill, Townsend, Penholloway Swamp, Altamaha Watershed.

- Contact Mr. David Mixon, Regional Supervisor, Georgia DNR Wildlife Resources Division - 912.262.3173

2.C.2) Barrier Islands

Georgia has fourteen (14) major barrier islands that serve as a buffer against storms, storm surges and other natural forces. All but four of the barrier island are inaccessible by car and considered undeveloped. These islands constitute a great source to our local economy and natural heritage. Some of the islands that have not been discussed thus far in this letter are described below.

- Blackbeard Island – Blackbeard Island is a National Wildlife Refuge managed by the U.S. Fish and Wildlife Service. The island is 5,600 acres of protected uplands, marsh and beach needed to provide wintering habitat and protection for migratory birds and diverse wildlife, including many endangered and threatened species.

- Cumberland Island - Cumberland Island is Georgia's largest barrier island. It is 36,000 acres and one of the largest undeveloped barrier islands along the Atlantic Coast. The island has one of the largest maritime forests remaining in the United States and one of the largest wilderness areas in a national seashore on the East Coast.

- Jekyll Island – Jekyll Island is nearly 6,000 acres and is known as the "People's Island." Roughly 65% of the island is undeveloped and the developed portion hosts both residential homes and commercial operations for tourism. With only 300 full time residents, the majority of the people on Jekyll are visitors. The Georgia Sea Turtle Center is housed on Jekyll Island and is a valuable resource for sea turtle health and well-being.

- Little Cumberland Island – Little Cumberland is privately owned and managed, and relatively undeveloped island that is only accessible by boat. The island is 2,400 acres and supports nearly forty homes and a historic lighthouse. Researchers and residents of Little Cumberland Island support the oldest sea turtle monitoring project in the world.

- Little St. Simons Island – This 10,000-acre island is privately owned and managed as a retreat for visitors. The island has conducted extensive data gathering on conservation related issues and is often used as an important reference site for research projects.

- Ossabaw Island – This island is managed by the state and is Georgia's first heritage reserve. The undeveloped island consists of 12,000 acres of high ground, with significant archeological findings, wetlands, and heritage plants. 176 documented loggerhead sea turtle nests were found on Ossabaw in 2014.

- Sapelo Island – A great deal of ecological information has been collected and is available through the Sapelo Island Long Term Ecological Research Reserve.[15] The island is also home to a rich culture and impressive effort to preserve the heritage of African culture and practices.

- Sea Island – Sea Island is owned and managed by Sea Island Acquisitions. This island is home to nearly 500 residents and advertises as a high-end vacation resort. Sea Island hosted the 2008 G8 summit.

- St. Catherines Island – St. Catherines Island is a privately owned and protected 22,000 acre barrier island. Historically, the island has been protected and in the past, was managed as a zoological reserve in partnership with the Bronx Zoo. The island has a rich history including a major oil spill from World War II, after a German U-boat attack.

- St. Simons Island - St Simons is a developed barrier island with over 13,000 full-time residents. It boasts a charming beach lifestyle and thriving tourism economy, contributing nearly $735 million into the state's economy each year. In 2014, St. Simons Island was voted America's #1 Favorite Romantic Town as well as America's #1 Favorite Beach Town by *Travel + Leisure Magazine.* It is the area's natural, un-industrialized character that make is such a travel destination. St Simons is also home to Fort Frederica National Monument.

- Tybee Island – Tybee Island is located 18 miles from Downtown Savannah. Tybee Island is home to only 3,000 individuals who enjoy five miles of beautiful, uninterrupted sandy beaches. It boasts a significant tourism economy and is home to Ft. Pulaski National Monument.

- Wassaw Island – Wassaw Island is a 10,000-acre barrier island established as a national wildlife refuge by the Fish and Wildlife Service. As one of Georgia's uninhabited and protected island it is the fitting home to The Carretta Research Project, a hands on research, conservation and education project that has been documenting and tagging loggerhead sea turtles since 1973. [16]

2.D) Ecosystem health of the coastal Georgia region.

In 2015, the Georgia Department of Natural Resources (DNR) began releasing a series of "report cards" documenting the health of the ecosystems of coastal Georgia.[17] As the state agency charged with managing Georgia's diverse coastal natural resources, DNR collects data through numerous inventory and monitoring activities that produce information relevant to the possibility of offshore energy development. The report cards contain grades for various categories produced by comparing and contrasting data from monitoring activities with known standards and reference points. While this report card does not address every indicator or environmental issue facing the coast, it condenses fact-based knowledge about the condition of Georgia's coastal resources. (See Attachment 3 - CRD Report Card, published 2024).

[15] http://sapelonerr.org
[16] http://www.carettaresearchproject.org
[17] http://coastalgadnr.org/ReportCard

(3) Equitable sharing of developmental benefits and environmental risks among the various planning areas;

3.A) Benefits of offshore drilling do not outweigh its risks.

The Outer Continental Shelf Oil and Gas Leasing Program: 2017-2022 Draft Programmatic Environmental Impacts Statement, released in March 2016[18] (2017-2022 DPP) estimates only 550 million barrels of oil are available off the South Atlantic Coast. According to the U.S. Energy Information Administration, 6.95 billion barrels of petroleum products were consumed in 2014 in the United States.[19] The reserves estimated to be economically available off the coast of the South Atlantic, therefore, are only enough to meet one month of our domestic demand.

The 2017-2022 DPP also includes an economic valuation of the estimated reserves available within the fifteen (15) regions included in the program. In every situation, the South Atlantic, ranked last, contributing, in some cases a negative impact on our country's social value.[20]

The most often-used argument in support of offshore oil and gas exploration and development is that coastal communities should take the risk for the sake of the nation's energy security. However, the U.S. Department of Energy, under both Presidents Obama and George W. Bush, stated that oil and gas reserves off the entire East Coast of the United States are not significant enough to impact consumer prices at the pump or reduce our dependence on oversea supplies. More recently, President Trump's proposed FY 2018 budget undercuts this argument by recommending that the United States sell off half of the country's Strategic Petroleum Reserve, which was created in 1975 in a national energy security effort. [21]

3.B) Risks to Georgia jobs, businesses and environments are high.

The Georgia coastal environment is home to significant natural resources that support our local and state economy, as well as support healthy quality of life for local citizens and visitors. Offshore oil and gas development will require infrastructure investments that will fragment these sensitive habitats and disrupt sensitive habitats on our coast and continental shelf. Any disruption of our marshes due to pipelines, additional shipping channels or other activity necessary to support oil and gas development will have a negative impact on these productive environments and the jobs and quality of life they support.

Hundreds of thousands of citizens who reside and recreate on the Georgia coast have expressed their opposition to allowing oil and gas development in the Atlantic Outer Continental Shelf (OCS). Specifically, the Georgia cities of

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[18] U.S. Department of the Interior Bureau of Ocean Energy Management (March 2016). "Outer Continental Shelf Oil and Gas Leasing Program:2017-2022 Draft Programmatic Environmental Impacts Statement Volumes I and II. OCS EIS.EA BOEM 2016-001.

[19] http://www.eia.gov/tools/faqs/faq.cfm?id=33&t=6

[20] U.S. Department of the Interior Bureau of Ocean Energy Management (March 2016). "Outer Continental Shelf Oil and Gas Leasing Program:2017-2022 Draft Programmatic Environmental Impacts Statement Volumes I and II. OCS EIS.EA BOEM 2016-001.

[21] https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/budget/fy2018/budget.pdf

Brunswick, Hinesville, Kingsland, Porterdale, Savannah, St. Marys, and Tybee Island have passed resolutions opposing development of offshore energy reserves and lease sales of federal land off the Georgia coast. (See Attachment 4 - "GA Offshore Resolutions.pdf").

Additionally, many businesses that depend on healthy coastal ecosystems oppose the practice of seismic testing, the first step to offshore energy development in the Atlantic Ocean. More than 41,000 businesses, including many from Georgia, have joined the Business Alliance for Protecting the Atlantic Coast (BAPAC) in an effort to unify corporate opposition to offshore energy exploration using seismic technology and offshore oil and gas development.[22]

(4) **Other uses of the sea and the seabed,** including commercial and recreational fisheries; navigation; military activities; existing or proposed see lanes; potential sites of deep water ports (including liquefied natural gas facilities); subsea cables; satellite launch activities; potential offshore wind, wave, current, or other alternative energy sites; and anticipated uses of OCS resources and locations.

4.A) Military Operations

If offshore oil and gas development are allowed in the Atlantic OCS, One Hundred Miles is concerned for the security of military operations situated on our coast. The U.S. Department of Defense manages nearly 270,000 acres of Georgia marshes, wetlands, and uplands. The coast of Georgia is home to numerous military installations, including Naval Submarine Base Kings Bay, Fort Stewart, and Hunter Army Airfield. These installations conduct critical military preparedness, testing, and training operations.

In St. Marys, Georgia, Kings Bay Naval Submarine Base is an active duty station that manages, maintains, and operates $32 billion of ballistic and guided missile submarines and other systems.[23] This installation houses nuclear powered vessels, so its safety is essential to our national security. The continued success of Kings Bay operations is also essential to our regional economic development, contributing more than one billion dollars to the local economy.[24]

In addition, the U.S. Navy Air Systems Command hosts an Undersea Warfare Training Range (USWTR) off the South Georgia/North Florida coast.[25] This facility will be an underwater tracking and communications facility for anti-submarine warfare and anti-surface warfare training. Once installed, the range will host hundreds of anti-submarine warfare exercises involving multiple ships, aircraft, submarines, sound-emitting sonobuoys, and other platform, each year.

Many of our coastal communities are dependent on continued safe operation of the military operations in the coastal area. On October 30, 2015, the US Department of Defense (DoD) issued the "DoD Mission Compatibility Planning Assessment: BOEM 2017-2022 Outer Continental Shelf (OCS) Oil and Gas Leasing

[22] http://protectingtheatlanticcoast.org
[23] https://www.cnic.navy.mil/regions/cnrse/installations/navsubbase_kings_bay/om.html
[24] http://thebrunswicknews.com/news/local_news/kings-bay-impact-billion-to-local-economy/article_023723b9-1cb4-53f0-9fda-02b613ff66a7.html
[25] https://www.naval-technology.com/news/us-navy-uswtr-inci-programme/

Drat Proposed Program" (Compatibility Report).[26] In that report, DoD categorized locations within each of BOEM's Atlantic OCS planning areas, including the Jacksonville Operations Area (OPAREA), in which the coast of Georgia falls. While the report contains a great deal of redacted information, it clearly limits offshore activities in the majority of land off Georgia's shore potentially open for lease sales.

4.B) Liquefied natural gas facility in Chatham County, Georgia

In November 2016, Elba Liquefaction Company, L.L.C. and Southern Liquefied Natural Gas (LNG) Company, L.L.C. began construction on the Elba Liquefaction Project, which will add liquefaction and export capability to an existing liquefied natural gas terminal located at Elba Island in Chatham County, Georgia.[27] The project involves 10 modular units that convert gaseous methane to a liquid, reducing its volume 600-fold and making it suitable for export in specially designed tanker ships.

(5) Relative environmental sensitivity and marine productivity of the different planting areas and/or a specific section of a given OCS planning area;

5.A) Southeast Coast ranks highest in environmental sensitivity

Georgia's 368,000 acres of saltmarshes are renowned for their productivity. Scientific reviews[28] find that coastal Georgia marshlands are important nursery habitat for fin and shellfish. Marsh vegetation fuels the food webs that support aquatic life by exporting nutrients, energy, and organic material. Fisheries off our coast are dependent on a continual supply of such nutrients from healthy and functional marsh systems. (See Attachment 5 - "schmidt_CIG_report_April2014_Value of Ecosystem Services[1].pdf").

The 2017-2022 DPP released in March 2016 includes an environmental sensitivity ranking to communicate the value the planning regions have for marine mammals, sensitive habitat and fisheries. The South Atlantic region received the highest ranking.[29]

5.B) North Atlantic right whale will be further endangered by OCS activities

Georgia's state marine mammal, the North Atlantic right whale (*Euballaena glacialis*), is considered one of the most endangered whale species in the world, with a population of less than 350 whales and only 100 calving females.[30] A major element in helping the species recover is protecting their calving habitat, which spans from South Carolina, Georgia and North Florida. North Atlantic right whales are present in Georgia coastal waters from November to April, annually. Oil and gas

[26] https://usa.oceana.org/wp-content/uploads/sites/4/662/2017-2022-dod-ocs-report.pdf
[27] https://echo.epa.gov/detailed-facility-report?fid=110007355209
[28] Schmidt, J.P. (2014) "The Value of Ecosystem Services Provide by Georgia's Coastal Marshes." Report to Georgia Department of Natural Resources. April 2014. 16 pages.
[29] U.S. Department of the Interior Bureau of Ocean Energy Management (March 2016). "Outer Continental Shelf Oil and Gas Leasing Program:2017-2022 Draft Programmatic Environmental Impacts Statement Volumes I and II. OCS EIS.EA BOEM 2016-001.
[30] http://www.nmfs.noaa.gov/pr/species/mammals/whales/north-atlantic-right-whale.html

development off the Southeast coast will lead to increased vessel traffic and noise which will impact the right whales. Additionally, should an oil spill occur during calving season would have major implications because the Southeast is the only calving ground for the species.

6.) Overall implications of oil and gas development off Georgia's coast

One Hundred Miles is quite concerned for the impacts that will be caused by onshore industrialization and oil spills should BOEM move forward with lease sales to allow oil and gas development off the Georgia coast. Oil and gas development requires the support of heavy onshore infrastructure. In an area that historically has not supported such industry, the Georgia coast will become industrialized. Miles of pipelines, refineries and smokestacks will have long-term changes that are not compatible with the local economies and character of the communities of the Georgia coast. Infrastructure construction will impact large tracts of coastal land, produce waste and pollution from offshore operations and result in the significant loss of coastal wetlands. According to the Center for Health and the Global Environment at Harvard Medical School, oil refineries present major health hazards for human communities as well as marine and terrestrial ecosystems.[31] An average refinery releases on a daily basis up to an estimated 11,000 gallons of oil into the air, land, and water, and emits dangerous pollutants such as hydrocarbons, sulfur dioxide, carbon monoxide and particulate solids.[32]

Like many groups and individuals across the United States, we are very concerned about the potential of offshore oil and gas development resulting in chronic and disaster-related oil spills. These spills cause irreversible damage to marine and coastal environments, and the destructive impacts of large spills are immediate and severe. Even with improvements in technology, spills from tanker ships and pipelines continue to occur, often going undiscovered or unabated for long periods of time. Oil spills and cleanup efforts are not just deadly to marine life, but also disruptive to ship traffic and detrimental to impacted shorelines, the commercial and recreational fishing industries, and coastal tourism. Recovery from an oil spill is particularly difficult in light of the fact that current cleanup methods can remove only a small fraction of oil spilled in marine waters.[33]

Georgia's coast experiences nearly seven-foot tides twice a day. With such amazing fluctuations, we can anticipate that any minor or major spill can travel upstream into our freshwater rivers and streams. Additionally, our coast is subject to strong hurricanes and major weather events that could heighten the likelihood of a spill or related disaster.

7.) Georgians Oppose Oil and Gas Development off our Coast

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[31] Oil: A Lifecycle Analysis of its Health and Environmental Impacts 5 (Paul R. Epstein & Jessie Selber, eds., 2002), http://www.chgeharvard.org/resource/oil-life-cycle-analysis-its-health-and-environmental-impacts

[32] Id. at 27.

[33] "Cumulative Environmental Effects of Oil and Gas Activities on Alaska's North Slope" (2003) from National Academies of Science, Engineering and Medicine. On Environmental Studies & Toxicology. http://books.nap.edu/openbook.php?record_id=10639&page=7

Hundreds of thousands of Georgians oppose opening the Southeastern coast to oil and gas development. Action by Georgia citizens has resulted in the adoption of eighteen local resolutions in communities throughout the state. Over one million Georgians are represented by resolutions opposing oil and gas development off our coast (See Attachment 4 for a sample of the resolutions passed by local governments in coastal Georgia).

The Georgia House of Representatives adopted, nearly unanimously, a resolution stating very clearly that oil and gas development was contrary to the fishing and tourism-based economy on which our coastal communities depend. The 2019 resolution resolves that:

> *"THE HOUSE OF REPRESENTATIVES that the members of this body express their support for Georgia's coastal tourism and fisheries and voice their opposition to oil exploration and drilling activities, including seismic testing, off of the Georgia coast."* [34] (See Attachment 6 – HR 88 2019*).*

The local and state level actions were further supported by Congressman Buddy Carter who requested that BOEM exempt the state from the 5-year leasing plan.[35] In Congressman's letter, he supports his constituents and states:

> "… I hope you will recognize the will of our state and local communities and make the appropriate changes to exclude Georgia moving forward." (See Attachment 7 - carterlettertodoi).

Conclusion

In conclusion, One Hundred Miles joins hundreds of thousands of Georgia citizens, organizations, and businesses in requesting that the South Atlantic, in particular the State of Georgia, be excluded from BOEM's 11th National OCS Oil and Gas Leasing Program. The agency should uphold the 10-year moratorium enacted by President Donald Trump in 2020,[36] banning oil and gas development in the Atlantic States of Florida, Georgia, and South Carolina from 2022 to 2032.

We believe the information we have provided in this letter and the attachments, along with the information you collect through the public process will demonstrate that the significant natural and historical assets found on and offshore of the Georgia coast far outweigh benefit of the minimal oil and gas reserves estimated to be economically recoverable in the South Atlantic.

Thank you for your consideration of these comments. I am available at any time to answer questions or to clarify any points made herein. (alice@onehundredmiles.org or 912-230-6494).

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[34] Georgia General Assembly 2019 – House Resolution 88 Adopted - https://www.legis.ga.gov/legislation/54340

[35] https://www.savannahnow.com/story/news/2019/04/04/coastal-georgia-congressmans-reversal-on-drilling-stuns-activists/5531298007/

[36] https://apnews.com/article/water-quality-north-carolina-florida-elections-environment-c98482ef78b964cc7d09bf2e0e1ab34

Sincerely,

Alice M. Keyes
Vice President of Coastal Conservation

Attachments:

- Attachment 1 - Center_for_the_Blue_Economy_Atlantic_Offshore_Drilling.pdf
- Attachment 2 - WHSRN_Hatt narrative – FINAL.pdf
- Attachment 3 – GA Coast Report Card.pdf
- Attachment 4 – GA Offshore Resolutions.pdf
- Attachment 5 - schmidt_CIG_report_April2014_Value of Ecosystem Services[1].pdf
- Attachment 6 – HR 88 2019.pdf
- Attachment 7 – carterlettertodoi.pdf