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Submitted via www.regulations.gov

Ms. Kelly Hammerle
National Program Manager
Bureau Ocean Energy Management (VAM-LD)
45600 Woodland Road,
Sterling, VA 20166-9216

Re: Comments in Response to the 11th National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program MAA104000 (BOEM-2025-0483)

Dear Ms. Hammerle:

On behalf of Altamaha Coastkeeper, Birds Georgia, Brunswick Environmental Action Team, Buxton Civic Association, Cape Fear Surfrider Foundation, Carolina Ocean Alliance, Center for a Sustainable Coast, Chesapeake Bay Foundation, Chesapeake Climate Action Network, Chirping Bird Society, Coastal Carolina Riverwatch, Cypress Group of NC Sierra Club, Georgia Conservation Voters, Georgia Interfaith Power and Light, Georgia Rivers, Lynnhaven River NOW (LRNow), NC League of Conservation Voters, North Carolina Coastal Federation , Ogeechee Audubon Society, Ogeechee Riverkeeper, One Hundred Miles, Save Sledge Forest, Science for Georgia, Inc, Sierra Club, Sierra Club Roanoke Group, SODA , South Carolina Wildlife Federation, Southern Alliance for Clean Energy, Surfrider Foundation, Surfrider Foundation Virginia Chapter, Third Act Georgia, Virginia League of Conservation Voters, Waterkeepers Chesapeake, and Wild Cumberland, the Southern Environmental Law Center submits these comments to the Bureau of Ocean Energy Management ("BOEM") on its 11th National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program.

Our organizations welcome BOEM's decision to remove the Atlantic planning areas from the Draft Proposed Program. Our Atlantic Coast communities have long been opposed to offshore drilling and seismic activities off our coast, with more than 250 communities, businesses, governors, and other elected leaders united in bipartisan opposition to oil and gas development in our region. We appreciate BOEM's continued recognition that the Atlantic Coast—and the communities, economies, and natural resources it supports—are simply too important to risk.

At the same time, we stand with communities bordering the Gulf, the Pacific, and Alaska in urging BOEM to forego new leasing in those areas. Offshore drilling brings unavoidable risks to human health, coastal ecosystems, tourism, fisheries, and cultural resources. As the world learned in the wake of the Deepwater Horizon spill, there is no such thing as safe offshore drilling, nor is there a guarantee of an easy cleanup when a significant spill occurs. Even in the absence of catastrophic spills, offshore oil and gas development consistently causes smaller, routine spills that harm marine life and damage our coastal environments.

Moreover, expanded production and consumption of oil and gas will only perpetuate and exacerbate the impacts of climate change, which are already affecting our Atlantic communities and those across the country. Our coastal populations and ecosystems are already threatened by sea level rise, more intense hurricanes, and storm surge. Extreme rainfall has also become more frequent and damaging throughout the Southeast, and tidal flooding and the damage and disruption it causes is becoming more regular in cities from Norfolk, Virginia to Savannah, Georgia.

U.S. energy needs can and should be met in safer, cleaner ways. Clean energy sources are already driving substantial economic growth, job creation, and resilience, by providing reliable, affordable, and domestically controlled power. In 2024, over 90% of new utility-scale electric capacity additions came from solar, wind, and battery storage, a trend expected to continue in the future. This rapid expansion is strengthening local economies, reducing consumer energy costs, and improving grid reliability, particularly during extreme weather events. While we recognize that oil and gas will remain a part of the energy mix during a transition period, existing leases and resources support those needs. We therefore urge BOEM to forego consideration of expanded offshore oil and gas leasing in its 11th National Outer Continental Shelf Oil and Gas Leasing Program.

Thank you for the opportunity to comment and for recognizing the Atlantic's importance to the communities, economies, and natural resources of our region. We urge BOEM to extend that same protection to every U.S. coast.

Sincerely,

Megan Huynh

Megan Hinkle Huynh
Wetlands and Coasts Program Leader
Southern Environmental Law Center