



March 9, 2018

Kelly Hammerle  
National Program Manager  
Bureau of Ocean Energy Management  
U.S. Department of Interior  
45600 Woodland Road  
Mailstop VAM-LD  
Sterling, VA 20166

**RE: Opposition to the Draft Proposed Outer Continental Shelf Oil & Gas Leasing Program from Surfrider Foundation Georgia**

Dear Ms. Hammerle:

**Surfrider Foundation Georgia** writes to express strong opposition to BOEM's Draft Proposed 2019-2024 Outer Continental Shelf ("OCS") Oil and Gas Leasing Program ("Leasing Program"). The expansion of offshore oil drilling in the Atlantic, Pacific, Eastern Gulf of Mexico, and Arctic Ocean would cause enormous and unnecessary negative impacts to our nation's marine ecosystems, coastal communities, and vital recreation and tourism industries.

For the reasons set forth below, Surfrider Foundation Georgia opposes the inclusion of oil and gas leases in all areas subject to the Leasing Program, including in areas adjacent to the State of Georgia and surrounding waters.

**A. Overview**

Offshore oil and gas development in new areas would require seismic surveys, drilling operations, oil transport by tankers, and the installation of platforms, pipelines, and other infrastructure. Collectively these activities would significantly damage the environment, marine wildlife, and coastal economies and ways of life. New offshore drilling would also expose the marine environment and coastal communities to the risks of another catastrophic oil spill.

In addition, the draft proposal contradicts previous findings of your agency, scientific experts, and the expressed wishes of a vast majority of the general public. In 2016, the Bureau of Ocean Energy Management finalized its five-year offshore drilling program for 2017-2022, a plan that was carefully developed after years of scientific analysis and submission of comments by millions of Americans. The program generated by that process protects the Atlantic, Pacific, Eastern Gulf of Mexico, and Arctic Ocean from offshore oil and gas development and has significant bipartisan support, as demonstrated by a [letter](#) signed by more than 100 House Democrats and Republicans.

Industries that rely upon a healthy marine ecosystem, including tourism and recreation, generate billions of dollars for coastal states and the nation as a whole. Coastal recreation and tourism accounts for 83 percent of establishments and 71 percent of employment opportunities for coastal communities in the United States. Additional studies by the Surfrider Foundation and our partners to inform ocean planning efforts in the Northwest, Northeast and Mid-Atlantic have

documented the extensive public participation and economic impacts of non-consumptive ocean and coastal recreation.<sup>1</sup>

These coastal recreation opportunities depend on clean beaches and waters, abundant wildlife, and scenic view sheds – all of which would be compromised by the expansion of offshore drilling. A spill could cause catastrophic impacts to these coastal communities, a truth we should have learned from previous spills in other areas that have had long-lasting impacts on local tourism rates, with major disasters resulting in 25 percent of small businesses unable to re-open. Oil and gas companies have claimed that improvements in technology have greatly reduced the likelihood of a spill, yet between 2006 and 2015, 389 oil spills occurred from OCS platforms and pipelines (not even counting associated vessels and barges), tarnishing our coastlines with roughly 206.5 million gallons of oil.<sup>2</sup>

## **B. State of Georgia**

The expansion of offshore oil drilling in areas adjacent to the State of Georgia and surrounding waters presents unique and specific risks.

### **1. Economy**

The Leasing Program poses a significant threat to coastal tourism and other local businesses that depend on clean and health beaches. Such threats are present without comparable economic benefits<sup>3</sup>:

- Offshore drilling threatens over 23,000 jobs and roughly \$1.3 billion Gross Domestic Product in Georgia for only one day's-worth of oil and one day's-worth of gas.
- At current national consumption rates, the Atlantic's supply of undiscovered economically recoverable offshore oil and gas would only meet domestic oil demand for less than seven months and gas demand for less than six months.

### **2. Unique Tidal Ecosystem**

Georgia's unique tidal ecosystem presents significant risks in the event of inevitable spills associated with the Leasing Program<sup>4</sup>:

A distinguishable characteristic of the Georgia coast is its tidal ecosystem. The Georgia coast is in the approximate center of the curved coastline known as the Georgia Bight, which extends from Cape Fear, North Carolina to Cape Canaveral, Florida. As the tide approaches the Atlantic coast, the northern portion of the Bight is hit first. As the water makes its way towards the center of the Bight along the Georgia coast, the water piles up and increases in elevation. Nearby coastal communities of Cape Hatteras and Miami generally have two-foot tides, but by the time the water reaches the Georgia coast, the high and low tides rise and fall between six to ten feet twice a day.

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<sup>1</sup> Coastal Recreation Studies. Surfrider Foundation. <http://www.surfrider.org/pages/coastal-recreation-studies>

<sup>2</sup> 2016 Update of Occurrence Rates for Offshore Oil Spills. Bureau of Ocean Energy Management & Bureau of Safety and Environmental Enforcement. <http://www.bsee.gov/sites/bsee.gov/files/osrr-oil-spill-response-research/1086aa.pdf>

<sup>3</sup> Oceana Georgia Fact Sheet. [http://usa.oceana.org/clean-coast-economy?\\_ga=2.210082327.381467490.1520625649-37630061.1520625649](http://usa.oceana.org/clean-coast-economy?_ga=2.210082327.381467490.1520625649-37630061.1520625649)

<sup>4</sup> University of Georgia Website. <http://gaacoast.uga.edu/about/georgia-coast/overview>

### **3. Gray's Reef National Marine Sanctuary**

The State of Georgia is home to the Gray's Reef National Marine Sanctuary ("Gray's Reef"), a treasured resource. Gray's Reef would be significantly impacted from seismic testing and drilling operations<sup>5</sup>:

The natural live-bottom reef is teeming with marine life and is part of the endangered North Atlantic right whale's calving ground. Loggerhead turtles rest at the reef, where scientists have identified more than 200 fish species. Gray's Reef was designated as a sanctuary on January 16, 1981, and is the only protected natural reef area on the continental shelf off the Georgia coast. The 22 square miles of Gray's Reef protects an area that is recognized nationally and internationally.

Gray's Reef is protected and governed by the National Marine Sanctuaries Act ("NMSA").

### **4. North Atlantic Right Whale**

North Atlantic Right whale populations would be placed at significant risk from seismic testing and drilling operations<sup>6</sup>:

North Atlantic Right Whale With as few as 400 remaining, NOAA Fisheries is dedicated to the conservation and recovery of North Atlantic right whales. Right whales are protected under the Marine Mammal Protection Act ("MMPA") and the Endangered Species Act ("ESA"). Their two greatest threats are entanglement in fixed fishing gear and vessel strikes. Each fall, right whales travel more than 1,000 miles from their feeding grounds off Canada and New England to the warm coastal waters of South Carolina, Georgia and northeastern Florida. These southern waters are the only known calving area for the species; an area where they give birth and nurse their young.

### **5. Local Governments and Elected Officials**

Local governments and elected officials are uniting in opposition to the prospects of offshore oil and gas exploration. Dozens of Atlantic coastal communities, including Brunswick, Savannah and St. Marys, have signed resolutions opposing exploration due to environmental, tourism and fishing concerns.<sup>7</sup>

The Georgia General Assembly is considering resolutions (HR 1041 and SR 706) that support coastal fisheries and tourism and oppose offshore drilling in Georgia.

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<sup>5</sup> NOAA Website. <https://graysreef.noaa.gov>

<sup>6</sup> NOAA Website. [http://sero.nmfs.noaa.gov/protected\\_resources/right\\_whale](http://sero.nmfs.noaa.gov/protected_resources/right_whale)

<sup>7</sup> AJC Website. <https://politics.myajc.com/news/state--regional-govt--politics/deal-coastal-georgia-officials-raise-concerns-about-offshore-drilling/wUzlcAB3cmDRaNPY9s6M8J>

### **C. Summary**

In summary, we ask that you protect the Atlantic Coast, Pacific Coast, Eastern Gulf of Mexico and Arctic Ocean from any oil and gas exploration and development activities in the revised 2019–2024 OCS Oil and Gas Program. We also ask that the Bureau of Ocean Energy Management undertake a robust analysis that adequately analyzes the cumulative impacts to the environment, coastal communities, and existing industries from drilling operations and large oil spills, and considers alternatives to offshore drilling.

Surfrider Foundation Georgia appreciates the opportunity to provide these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Combs", written in a cursive style.

Steve Combs, Chairperson

Surfrider Foundation Georgia