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March 30, 2015

Bureau of Ocean Energy Management (BOEM), Department of the Interior
<http://www.regulations.gov/#!submitComment;D=BOEM-2014-0096-0001>

RE: BOEM-2014-0096 - Draft Proposed Outer Continental Shelf (OCS) Oil and Gas Leasing Program for 2017-2022 (DPP)

To Whom It May Concern:

The Georgia Conservancy appreciates the opportunity to comment on the above referenced draft proposal to open areas of the outer continental shelf for oil and gas leases including the waters off the Georgia coast.

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, growth management and marine conservation issues. Founded in 1967, we are Georgia's oldest nonprofit conservation organization and have a long history of advocating for coastal protection. We have had a coastal office in Savannah since 1972 and have worked with the Department of the Interior on many efforts to preserve our coast.

Out of Georgia's 14 barrier islands, only four are accessible by bridge. Our islands remain mostly undeveloped. They offer sanctuary for migrating birds and a home to a number of endangered and threatened species.

The Georgia Conservancy has a rich history of protecting our barrier islands such as Cumberland Island which became a National Seashore in 1972 and Little Tybee Island that became a state-owned Wildlife Management Area in 1990.

We work to protect Georgia's salt marshes which comprise about one-third of the marshes on the Eastern Seaboard. The health of our salt marshes is important for Georgia's future. Our marshes are habitat to a wide range of commercially and recreationally important species, and provide an important buffer for hurricanes.

Through our Coastal Policy, 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.*

In line with our policies and marine conservation efforts, the Georgia Conservancy is opposed to drilling for oil and natural gas in the waters off the Georgia coast.

Following the catastrophic Deep Horizon BP oil spill in the Gulf of Mexico in 2010, the Georgia Conservancy stated our opposition to the Obama Administration's proposal to open Georgia's waters to offshore oil and natural gas leases.

An oil spill could threaten many species, from the endangered North Atlantic right whales, which calve in the waters along Georgia's coast from November through April, to the Wilson's plover, a small shorebird that feeds on our beaches. A spill would impact the state's shipping and tourism industries. The Port of Savannah is the nation's fourth busiest container terminal in the United States. Historic Savannah and the barrier islands generate \$3 billion or more in tourism revenue every year.

Referencing *The History of the Georgia Conservancy 1967-1984*, we have been down this road before. In 1975, the Georgia Conservancy became an active stakeholder following plans to expand domestic oil production on Georgia's coast.

In May 1976, the Georgia Conservancy co-sponsored a unique conference with the Coastal Zone Management program. For the first time anywhere in the nation, government, petroleum industry, and environmental representatives from several states met to consider the onshore impact of offshore oil and gas development. This took place in May 1976 at Savannah's DeSoto Hilton and some 60 people participated. At issue were recreational demands and environmental protection balanced against economic expansion. Such expansion could bring demands on public services, oil spills, and health hazards, as well as jobs and profits. The conference identified potential negative impacts and explored ways to minimize them. That same year, President Carter recommended policies to reduce oil spills in light of the December 1976 Argo Merchant disaster.

In 1977 the Interior Department continued to prepare for offshore oil and gas oil and drilling. The Georgia Conservancy warned about fishing and tourism as well as the environment. When the environmental impact statement was released, the Conservancy's then-coastal director Hans Neuhauser suggested that exploration be related to comprehensive national energy policy which the Carter Administration subsequently produced.

In 1978, our executive director Cecil Phillips and Hans Neuhauser went to DC to work with the Natural Resources Defense Council on an issue that left Georgia's coast vulnerable. In spite of strong opposition from the Carter Administration, they sought and obtained four revisions to the terms of the lease sales, thereby closing the legal gaps in the protective measures. The Georgia Conservancy urged that measures include a fund for optimal damages to fisheries. On September 18, President Carter signed a bill overhauling offshore leasing legislation for the first time ever in a quarter century. It contained the protection the Georgia Conservancy sought.

In 1979, first sinking of test wells in the Southeast embayment produced no oil. Interest quickly waned and all leases reverted back to the government.

In closing, the Georgia Conservancy does not believe oil drilling in Georgia's offshore waters is in the best interests of our State or Nation. The risks far outweigh the reward. We appreciate the opportunity to voice our concerns and offer some historical reference in hopes that you will not lease areas off the Georgia coast for oil and natural gas drilling.

Thank you for your consideration.

Sincerely,

Robert Ramsay
President

Clay Mobley
Coastal Director