



August 16, 2017

Walter Cruickshank, Ph.D., Acting Director
Bureau of Ocean Energy Management
1849 C Street, NW
Washington, D.C. 20240

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Executive Director

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RE: Preparation of 2019-2024 National Outer Continental Shelf Oil and Gas Leasing Program

Dear Dr. Cruickshank:

The Association to Preserve Cape Cod (APCC) strongly opposes any changes to the nation's five-year offshore energy leasing plan that would open up areas of the outer continental shelf in the Atlantic and Arctic Oceans to oil and gas exploration.

Established in 1968, APCC is the Cape Cod, Massachusetts region's leading nonprofit environmental advocacy and education organization, working for the adoption of laws, policies and programs that protect and enhance Cape Cod's natural resources and quality of life. APCC focuses our efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic. Because of the geographic focus of APCC's mission, the following comments are directed specifically toward our concerns over any action that would permit offshore drilling in the Atlantic Ocean.

Cape Cod's economy, quality of life and fragile environment are directly linked to the health of the Atlantic Ocean and our coastal waters. Cape Cod's pristine beaches and historic coastal communities draw millions of visitors from around the world each year. Our residents' livelihoods are largely dependent upon the tourism industry, and the Cape's commercial and recreational fishing and shellfishing are a vital part of our regional economy. The shoreline that surrounds Cape Cod supports sensitive coastal ecosystems, which provide valuable habitat for a great variety of plant and animal species, including many commercially important fish species, as well as rare and endangered shorebirds. The ocean waters off the Cape Cod coast, which range from shallow banks to deep sea canyons, are also habitat for a great diversity of life, including many rare species such as the critically endangered North Atlantic right whale. These waters also support the fish populations that sustain the Northeast's commercial fishing industry.

It is with absolute certainty that an oil spill along the Atlantic's outer continental shelf would be devastating to Cape Cod's environment and economy. Opening the Atlantic to oil and gas drilling recklessly gambles our region's future against short-term profits for private industry. Despite claims of safety improvements in offshore drilling, history has demonstrated too many times that catastrophic accidents can and do occur. No matter how much modern technology can claim to minimize the likelihood of a spill, it will never be worth the risk drilling poses to Cape Cod, or to other vulnerable regions along the Atlantic coast.

Only seven years ago, the BP Deepwater Horizon oil rig explosion resulted in one of America's

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worst environmental disasters, releasing over 170 million gallons of oil and unleashing an unprecedented environmental and economic nightmare that continues to reverberate throughout the Gulf states. Economic impacts include an estimated \$247 million loss to the Gulf's commercial fishing industry¹ and approximately \$693 million in lost recreation and tourism revenue to states and businesses². In ecological damages, roughly 22,000 tons of oil washed up on Gulf Coast shores, contaminating over 1,300 miles of coastline, 3,200 square miles of ocean floor and 57,000 square miles of surface water³. The spill caused the death of about a million seabirds⁴ as well as mortalities and population decreases in several whale and dolphin species⁵. Approximately eight billion oysters were killed, and significant amounts of oyster growing habitat were lost⁶.

Atlantic coastal communities simply cannot afford the risk of a similar human and environmental tragedy along our shores.

APCC joins the multitude of voices calling on the Trump administration to keep in place the current five-year offshore energy leasing plan, which preserves a moratorium on oil and gas drilling in the Atlantic and Arctic Oceans. The administration should instead work aggressively towards expanding research and development of renewable energy sources—the direction in which the global economy has moved and where it will continue to grow in the future.

Sincerely,



Andrew Gottlieb
Executive Director

cc: Senator Edward Markey
Senator Elizabeth Warren
Representative William Keating

¹ McCrea-Strub, A., et al., "Potential Impact of the Deepwater Horizon Oil Spill on Commercial Fisheries in the Gulf of Mexico," *Fisheries Research* 36, No. 7 (2011): 332–336.

² Deepwater Horizon Natural Resource Damage Assessment Trustees, *Deepwater Horizon oil spill: Final Programmatic Damage Assessment and Restoration Plan and Final Programmatic Environmental Impact Statement*. National Oceanic and Atmospheric Administration (NOAA), February 2016, www.gulfspillrestoration.noaa.gov/restoration-planning/gulf-plan.

³ Deepwater Horizon Natural Resource Damage Assessment Trustees, *Deepwater Horizon Oil Spill*. Boufadel, M.C., et al., "Simulation of the Landfall of the Deepwater Horizon Oil on the Shorelines of the Gulf of Mexico," *Environmental Science & Technology* 48, No. 16 (2014): 9496-9505.

⁴ Haney, J.C., Geiger, H.J., and Short, J.W., "Bird Mortality from the Deepwater Horizon Oil Spill. I. Exposure Probability in the Offshore Gulf of Mexico." *Marine Ecology Progress Series* 513 (2014): 225-237. Haney, J.C., Geiger, H.J., and Short, J.W., "Bird mortality form the Deepwater Horizon oil spill. II. Carcass Sampling and Exposure Probability in the Coastal Gulf of Mexico," *Marine Ecology Progress Series* 513 (2014): 239–252.

⁵ Deepwater Horizon Natural Resource Damage Assessment Trustees, *Deepwater Horizon Oil Spill*.

⁶ *Ibid.*