



February 9, 2018

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Secretary Ryan Zinke
U.S. Department of the Interior
Attn: Kelly Hammerle
National OCS Oil and Gas Leasing Program Manager
Bureau of Ocean Energy Management
45600 Woodland Road
Sterling, VA 20166-9216

RE: 2019-2024 Draft Proposed Outer Continental Shelf Oil and Gas Leasing Program and Notice of Intent to Prepare a Programmatic Environmental Impact Statement

Dear Secretary Zinke:

The Association to Preserve Cape Cod (APCC) strongly opposes the 2019-2024 Draft Proposed Outer Continental Shelf Oil and Gas Leasing Program and the plan to open areas of the outer continental shelf in the Atlantic Ocean 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.

Cape Cod's economy 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 traditional and vital part of our regional economy.

The nearshore area surrounding 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 beyond the Cape's coastal area also provide a diversity of marine habitats that are important to the economy of the Cape region and the rest of Massachusetts. These include Georges Bank, which is crucial to the sustainability of Northeast fisheries; Stellwagen Bank National Marine Sanctuary, a critically important feeding ground for endangered whales, sea turtles and seabirds; and the Northeast Canyons and Seamounts National Marine Monument, which supports an abundance of diverse and unique marine life. An oil spill along the Atlantic's outer continental shelf would be catastrophic to these natural resource areas and to our regional economy.

As stated in our August 16, 2017 letter to Bureau of Ocean Energy Management Acting Director Walter Cruickshank, history has demonstrated too many times that oil spills can and do occur. Our nation is all too familiar with the devastating and costly impacts resulting from a major offshore oil spill. Only seven years ago, the BP Deepwater Horizon oil rig explosion

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resulted in one of America's 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.

The Deepwater Horizon spill resulted in 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 a significant amount of oyster growing habitat was lost⁶.

The potential for an oil spill capable of producing a similar human and environmental tragedy in Massachusetts waters—or any oil spill that could impact our region's marine ecological resources and coastal communities—is an unacceptable gamble.

On the state level and in the private sector, the transition from fossil fuels to renewable energy is moving forward. Massachusetts is fully committed to cutting back fossil fuel consumption, significantly reducing carbon emissions and investing in renewable energy production, and has already made great progress in that direction. America can and should be a global energy leader, but pursuing a policy that continues down the path of fossil fuel extraction and consumption will not get us there. The future of energy production is advancing increasingly and inexorably toward the use of renewables, and the U.S. government should take a leadership role in making it happen. APCC calls on the Department of the Interior and the Trump administration to withdraw its plan for offshore oil and gas exploration in the Atlantic and to instead direct its focus on investing in—and expanding—U.S. domestic development of renewable energy technologies such as wind and solar.

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 from 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.*