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February 28, 2018

Ms. Kelly Hammerle
Chief, National Oil and Gas Leasing Program
Development and Coordination Branch
Leasing Division, Office of Strategic Resources
Bureau of Ocean Energy Management (VAM-LD)
United States Department of the Interior
45600 Woodland Road
Sterling, VA 20166-9216

Submitted electronically via www.regulations.gov

Re: Docket ID: BOEM–2017–0074: 2019-2024 Draft Proposed National Oil and Gas Leasing Program

Dear Ms. Hammerle:

Mass Audubon strongly opposes the proposal to open the majority of America’s coastline to offshore oil and gas drilling, and specifically requests that the North Atlantic Outer Continental Shelf (OCS) region off New England be immediately and permanently deleted from the proposed scope of study for the Environmental Impact Statement (EIS). This is consistent with the position we have held on this matter for almost 40 years, and as owners of over 30 miles of Massachusetts coastline.

Regarding the January 8, 2018 US Department of the Interior/Bureau of Ocean Energy Management’s (DOI/BOEM) *Notice of Availability of the 2019-2024 Draft Proposed Outer Continental Shelf Oil and Gas Leasing Program and Notice of Intent To Prepare a Programmatic Environmental Impact Statement* and plans for two oil and gas lease sales in the North Atlantic, the exploration, development, and production of oil and gas off the Massachusetts OCS would have severe impacts on fisheries, wildlife habitat, and geological resources. Oil and gas drilling in this area would threaten the \$17.5 billion contributed annually to the region’s economy from coastal and ocean-based industries including recreation, tourism, and fisheries. It would be foolhardy to place these valuable natural resources at risk, especially when so much progress and economic growth is occurring through energy efficiency and development of clean, renewable

energy. This is especially true as BOEM has moved forward with three OCS lease sales for offshore wind energy off Massachusetts. The proposal by BOEM to renew the oil and gas leasing program off the New England coast is also inconsistent with the US Department of Commerce/National Oceanic and Atmospheric Administration's (NOAA) approved Massachusetts Coastal Zone Management (CZM) Plan and NOAA-approved Massachusetts' Ocean Management Plan.

Mass Audubon also attended the BOEM "National OCS Program Public Meeting" held in Boston on February 27, 2018.

There are four areas in particular that we are concerned about that could be significantly and severely impacted by oil and gas exploration, development and production:

Nearshore areas within 100 miles of the Massachusetts coast. The 1,500-mile coastline of the Bay State constitutes an environmentally sensitive, unique, and fragile marine environment that contributes substantially to the tourism and recreational economies of the Commonwealth. Any drilling or spills could pose a grave risk to that vitally important maritime resource and outweigh any benefits of developing coastal areas to drilling. Tourism in Massachusetts generates tens of billions of dollars of economic value annually and supports over 100,000 related jobs. The economic effects of our marine economy are extensive, providing a source of income and jobs for nearshore and offshore commercial and recreational fisherman, vessel and tackle manufacturers, marinas, restaurants, and other businesses throughout the Commonwealth, all of which would be threatened by offshore drilling and its associated risks of spills.

Georges Bank. Drilling would threaten critical ocean wildlife and habitat and would present an unacceptable risk to the fishery resources of one of the world's premier fishing grounds at Georges Bank. This shallow, sediment-covered underwater plateau has played a key role in New England's economic and cultural heritage as it was once one of the world's most productive fishing grounds. For more than four centuries, Georges Bank supported a lucrative fishery for Atlantic cod, haddock, and flounder. NOAA's National Marine Fisheries Service (NMFS) has closed much of the Bank to commercial fishing in order to allow the area habitat to recover from bottom-trawl fishing. Its habitat is now in the process of recovery, and any disruption caused by drilling will severely impact the long-term restoration efforts presently in place and jeopardize future sustainability. Additionally, at the southern edge of Georges Bank is Oceanographer Canyon, a 6,000-foot deep area rich in deep-sea corals, sponges, and other important species of invertebrates and fish that also could be impacted.

Last month, NMFS chose to retain the previously closed-to-fishing areas on the edge of Georges Bank and established new protected areas in the Great South Channel between Georges Bank and Cape Cod in order to afford more spawning protection to the cod stock. NMFS also established two new dedicated habitat research areas, one on Stellwagen Bank inside the Western Gulf of Maine closed-to-fishing areas, and the second on Georges Bank itself. Both should be off-limits to oil and gas exploration, development and production.

In addition to Georges Bank, NMFS reported in 2015 that commercial fishing in other areas offshore Massachusetts supported 83,000 jobs, with a landed fish value of more than \$550 million,

generating almost \$2 billion in income, along with \$7.3 billion in value-added impacts. That area should not be put in jeopardy by drilling.

Stellwagen Bank National Marine Sanctuary. Located between Cape Ann and Cape Cod in the southwest corner of the Gulf of Maine, the NOAA-managed Stellwagen Bank National Marine Sanctuary brings critical revenue to Massachusetts' state and local economies as one of the world's premier destinations for whale watching. While the public enjoys outdoor recreation at the sanctuary, scientists are engaged in marine research, conservation, and education. The Stellwagen Bank National Marine Sanctuary was designated due its long history of human use and its high natural productivity thanks to two distinct peak productivity periods that produce a complex system of habitats. These communities support benthic and pelagic species by providing cover and anchoring locations for invertebrates; they also provide feeding and nursery grounds for more than a dozen cetacean species including the endangered humpback, northern right, sei, and fin whales. The area supports foraging activity by diverse seabird species, including loons, shearwaters, storm petrels, cormorants, alcids, and terns. Seasonal fish and invertebrate populations include bluefin tuna, herring, cod, flounders, lobster, and scallops. Leatherback and Kemp's ridley sea turtles (both endangered species) use the area for feeding. The sanctuary is also rich in underwater archaeological treasures and is the site of more than 50 shipwrecks. Any hydrocarbon activities and the resultant potential for spills could also threaten the Stellwagen Bank National Marine Sanctuary.

Northeast Canyons and Seamounts National Marine Monument. These 4,913 square miles of rich and diverse marine ecosystem possess unique geological features that have been the subject of scientific exploration and discovery for decades. Monument features include three underwater canyons deeper than the Grand Canyon, and four underwater mountains (extinct volcanoes) known as "seamounts" that are biodiversity hotspots and home to many rare and endangered species. These include thousand-year-old deep sea corals found nowhere else on Earth and other rare fish and invertebrates. Additionally, the canyons and seamounts provide habitat for protected species such as endangered sperm, fin, and sei whales and Kemp's ridley turtles. Geologically, the Monument encompasses the only seamounts in the U.S. Atlantic.

Our opposition to drilling in these areas is consistent with Mass Audubon's long and active history on this critical conservation issue dating to the early 1980s, when limited exploratory drilling took place on the OCS and federal plans were advanced for a more expansive drilling program. However, since that time, Congress and various Presidents have placed temporary bans on offshore drilling. Mass Audubon has supported those bans and when they expired or were revoked, we advocated for their reinstatement.

More recently, we participated in the development of the Massachusetts Ocean Management Plan, and have held a gubernatorial appointment as chair of the Massachusetts Ocean Management Advisory Commission providing for coordinated and responsible stewardship of the state's ocean resources in coordination with the NOAA-approved CZM Plan and Program.

We also view BOEM's *2019-2024 Draft Proposed Outer Continental Shelf Oil and Gas Leasing Program and Notice of Intent to Prepare a Programmatic Environmental Impact Statement* as the first link in a chain of events leading to oil and gas exploration, development and production on the OCS and as having a direct affect on the adjacent designated Massachusetts Coastal Zone. This

federal activity would be inconsistent with the Massachusetts CZM Plan. For all of the above reasons, this proposal should be immediately cancelled.

Thank you for considering these comments.

Sincerely,



Jack Clarke
Director

JJC:jjc

cc: Massachusetts Congressional Delegation
Governor Charlie Baker
Attorney General Maura Healey
Massachusetts State Legislature
EEA Secretary Matthew Beaton
CZM Director Bruce Carlisle

Mass Audubon protects 37,000 acres of land throughout Massachusetts, saving birds and other wildlife, and making nature accessible to all. As Massachusetts' largest nature conservation nonprofit, our wildlife sanctuaries located in cities and towns include 20 nature centers and welcome over half a million visitors annually. From inspiring hilltop views to breathtaking coastal landscapes, serene woods, and working farms, we believe in protecting our state's natural treasures for wildlife and for all people – a vision shared in 1896 by our founders, two extraordinary Boston women. Today, Mass Audubon is a nationally recognized environmental education leader, offering thousands of camp, school, and adult programs that get over 225,000 kids and adults outdoors every year. With more than 125,000 members and supporters, we advocate on Beacon Hill and beyond, and work with conservation science partners, to preserve the natural heritage of our beautiful state for this and future generations. We welcome you to explore a nearby sanctuary, find inspiration, and get involved. Learn how at massaudubon.org.

Protecting the Nature of Massachusetts