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January 16, 2018

Senator Edward Markey
255 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Senator Markey,

On behalf of Mass Audubon, thank you for introducing the *New England Coastal Protection Act*.

As you know, on January 8, 2018, the US Department of the Interior/Bureau of Ocean Energy Management released a *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 in the North Atlantic.

Mass Audubon supports your efforts to oppose the proposed expansion of offshore oil and gas leasing off our country's coasts, and in particular, it is crucial that offshore drilling along the New England coast be barred. We stress the need for a permanent moratorium to be placed on the exploration, development, and production of oil and gas on the federally controlled Outer Continental Shelf (OCS) off the Massachusetts coast. Oil and gas drilling in this region 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 folly 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.

There are four areas in particular that we are concerned could be impacted by drilling:

Nearshore areas within 100 miles of the Massachusetts coast. The 1,500-mile coastline of the Bay State constitutes an environmentally sensitive and fragile marine environment that contributes substantially to the tourism and recreational economies of Massachusetts. Any drilling or spills could pose a grave risk to that vitally important maritime resource and outweigh any benefits of opening up more 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 business throughout the Commonwealth, all of which would be threatened by allowing 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. The National Marine Fisheries Service has closed much of the Bank to 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 disrupt 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.

In addition to Georges Bank, the National Marine Fisheries Service 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, 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 1980's, 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, providing for coordinated and responsible stewardship of the state's ocean resources in coordination with the NOAA approved Coastal Zone Management Program. The proposed drilling would be inconsistent with that plan, and for all of the above reasons this proposal should be withdrawn.

Thank you again for introducing the *New England Coastal Protection Act*, which we hope to see make those bans permanent.

Sincerely,



John J. Clarke
Director

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