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CFE/Save the Sound on Offshore Drilling: "Gains too little, risk too high"

New Haven, Conn. --- Connecticut Fund for the Environment/Save the Sound submitted comments Wednesday to the Bureau of Ocean Energy Management strongly opposing the Trump administration's proposal to lease nearly all the East Coast's offshore waters to oil and gas companies.

The comments highlight the imbalance between the short-term economic benefits of drilling in the Atlantic versus the tremendous risks such drilling would impose on Long Island Sound, wildlife, and the region's many residents and businesses who depend on clean, healthy waters. CFE/Save the Sounds asks that instead of opening our oceans to new drilling of fossil fuels, the Bureau protect the health of the public, our waterways, and Long Island Sound by encouraging responsibly sited off-shore ocean wind energy and other renewable resources.

Leah Schmalz, chief program officer for CFE/Save the Sound, says, "Opening massive new areas to offshore oil drilling would lock America into a future of dirty fossil fuels while simultaneously threatening the livelihoods of fishermen, the ecosystem of Long Island Sound, and the quality of life of our citizens. Instead of learning a lesson from the historic devastation of the BP oil tragedy, our federal government is creating a path to repeat it. The gains of offshore drilling are too little, the risk too high, and the need is not there."

The government's own estimates found that even if all of the economically recoverable offshore oil and gas in the Atlantic Outer Continental Shelf was extracted, oil demand would be met for less than five months and gas demand would for less than 10 months. However, the energy created by 20 years of offshore wind in the Atlantic would produce nearly twice as much energy and create about 91,000 more jobs than offshore drilling.

The Trump Administration's proposal to lease over 90 percent of the United States' offshore waters runs counter to the Coastal Zone Management Act, which gives coastal states rights over federal activities affecting their coastal zones.

For years, taxpayer dollars, federal and state resources, and the efforts of nonprofits have been dedicated to cleaning up Long Island Sound. New York City alone has spent billions over several years to clean up sewage and stormwater runoff in an effort to improve water quality. The risk to that investment looms large: there is no guarantee that a spill won't happen, there is no guarantee that large volumes of oil

wouldn't enter the Sound, and there is no guarantee that if this happened, an already-struggling ecosystem would recover in a lifetime.

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The general public may submit comments to Bureau of Ocean Energy Management until Friday, March 9, online at https://www.boem.gov/National-Program-Comment/.

Connecticut Fund for the Environment (CFE) is a non-profit organization with thousands upon thousands of members and over 10,000 activists around Connecticut and the Long Island Sound region. CFE, its bi-state program Save the Sound, and its Soundkeeper protect and improve the land, air, and water of Connecticut and Long Island Sound. We use legal and scientific expertise and bring citizens together to achieve results that benefit our environment for current and future generations.

Text of CFE/Save the Sound's comments to BOEM:

Connecticut Fund for the Environment/Save the Sound Before the Environment Committee In Opposition Docket ID: BOEM-2017-0074-0001 2019-2024 Draft Proposed National Oil and Gas Leasing Program

March 7, 2018

Connecticut Fund for the Environment (CFE) is a non-profit organization with thousands upon thousands of members and over 10,000 activists. CFE, its bi-state program Save the Sound, and its Soundkeeper protect and improve the land, air, and water of Connecticut and Long Island Sound. We use legal and scientific expertise and bring citizens together to achieve results that benefit our environment for current and future generations.

Dear Ms. Hammerle:

Connecticut Fund for the Environment and its bi-state program Save the Sound (CFE/Save the Sound) writes in opposition to the Draft Proposed National Oil and Gas Leasing Programs. We ask that instead of opening our oceans to new drilling of fossil fuels, that you protect the health of the public, our waterways, and Long Island Sound by canceling this program and investing the time and energy into off-shore, ocean wind (that is sited appropriately and sensitively) and renewable resources section of BOEM.

Increasing offshore drilling is not the answer to US economic success. The US is already a net exporter of fossil fuels, and it has done little help our economic state. Instead, the country must move to renewable resources for both the health of the planet and economic security. Closer to our home, our region's environment and economy are dependent on Long Island Sound, which produces at least \$17 billion a

year in economic benefit for Connecticut and New York. Any large oil spill would cause huge long-term economic loss and coastal zone property values would plummet. Moreover, any such incident would render moot the billions of dollars already invested in cleaning up the Sound.

The Trump Administration's proposal to lease over 90% of offshore waters of the United States is yet another federal giveaway foisted upon the American people in an attempt to provide an enormous, long-term handout to private corporations. These are public waters. This administration is already moving to reduce public access on land and is now proposing renting exclusive rights to around a billion acres of our waters. This is counter to the Coastal Zone Management Act, which gives coastal states rights over federal activities affecting their coastal zones. Although the leased waters are in federal jurisdiction, local currents would likely transport an oil spill across the 3-mile state line and into state governed waters. States should have a greater say in the development of projects that could seriously impact their coastal waters.

The true impact of deep sea drilling moves far beyond the footprint of an individual oil well. The seismic exploration, derrick construction, drilling and transport produce incredible noise pollution spreading hundreds of miles underwater. This unseen impact destroys habitats, displacing marine life from fish to whales across wide swaths of ocean. Direct sublethal and lethal effects of noise pollution are increasingly well documented. In

a recently released collection "Ecoacoustics: The Ecological Role of Sounds" (2017)1 highlights the work of twenty authors on the direct damage to marine fish and marine mammals.

In addition to the numerous ecological impacts of drilling the climate risks of drilling are disastrous. Carbon and methane emissions, coinciding with the use of fossil fuels, are of utmost concern. If the billions of barrels of oil believed to be obtainable are burned in cars or trucks, the carbon released will undoubtedly help intensify climate change. Even worse is the natural gas that will be produced with the oil. Natural gas or methane is a potent GHG with more than 20 times the warming potential of carbon dioxide.2

The greatest threat, however, is a spill. We have already seen the massive damage perpetrated upon coastal people and wildlife by historic well failures and tanker leaks. Imagine a spill the size of the Deepwater Horizon blowout or the Ixtoc failure that, together, dumped 350 million gallons of oil into the Gulf of Mexico. There would be miles of oil-soaked coastline, dead wildlife, oil-smeared boats, no racing, and no fishing.

Why would we voluntarily put our coastal resources at risk if there is no immediate need? By essentially placing these lands in a holding status for future drilling we are locking in a use that runs counter to the planet-wide effort to reduce the rate of

climate change through controlling carbon pollution.

For years, federal and state resources have been dedicated to cleaning up Long Island Sound. NYC alone has spent billions over several years to clean up sewage and stormwater runoff in an effort to improve water quality. If a large spill were to enter Long Island Sound it would concentrate in the Western Sound, an area of slowly improving water quality through tremendous use of public resources. Why would we risk such an enormous investment? There is no guarantee that a spill won't happen, there is no guarantee that large volumes of oil wouldn't enter the Sound, and there is no guarantee that if it this happened that an already struggling ecosystem would recover in a lifetime.

Opening new areas to offshore oil drilling would lock America into a future of dirty fuels, rather than fuel efficiency. Improving energy efficiency is the cheapest, cleanest, and quickest way to meet our energy needs. Focusing on fuel efficiency and other oil-saving measures could save nearly 4 billion barrels of oil annually by 2035. Notably, that's almost the same amount of oil, in a single year that the Interior Department estimates can ever be recovered from drilling all our offshore waters from Florida to Maine.3

There are more economically and environmental sound alternatives to offshore drilling. Compatible offshore, ocean wind power generation—which is generation that is sited in locations far from the sensitive areas along the shoreline, that avoids estuarine waters, and that is protective of environmental considerations like wildlife and unique areas of the open waters—holds enormous potential for renewable energy efforts, with the capacity to produce significantly more power due to stronger, more consistent winds, thereby by making the choice a more economical long term supply of energy.

A key Oceana report found4 that in just 13 years, offshore wind could generate more energy than could be provided by all of the economically recoverable offshore oil and gas resources. Additionally, in the next 20 years it could create about 91,000 more jobs than offshore drilling, powering over 115 million households.

Government estimates have suggested that even if all of the economically recoverable offshore oil and gas in the Atlantic Outer Continental Shelf was extracted and used, oil demand would only be met for less than five months and gas demand would only be met for less than 10 months. However, the energy created by 20 years of offshore wind in the Atlantic would produce nearly twice as much energy than what would be created by all of the economically recoverable oil and gas. Offshore wind could generate more electricity for coastal city centers and create more jobs, with the added benefit of curbing carbon emissions and improving US energy security.

In the northeast United States, compatible offshore, ocean wind makes particular sense given the region's high demand for power, population density, lack of

geographic space for onshore projects, and ambitious renewable energy commitments. Offshore wind energy offers the potential for jobs in shoreline project management, docking and staging of construction materials, facility maintenance, and manufacturing.

The gains are too little, the risk too high, and the need is not there.

Thank you,

Karina Krul, Policy Intern

Leah Schmalz, Chief Program Officer

1 Farina, A., Gage, S.H. 2017. "Ecoacoustics: The Ecological Role of Sounds John". Pub. Wiley & Sons, pp 352

 $2\ http://science.time.com/2012/07/20/its-not-just-spills-the-climate-risks-of-arctic-drilling/$

3 https://www.nrdc.org/sites/default/files/big-oil-oceans-IB.pdf (citing Tonachel, L., "Cleaner, Cheaper and Faster: Why Efficiency Beats Drilling," Natural Resources Defense Council (NRDC), March 10, 2011, www.nrdc.org/experts/luke-tonachel/cleaner-cheaper-and-faster-why-efficiency-beats-drilling (accessed February 2017); BOEM, "2017—2022 Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program."

 $4\ http://oceana.org/press-center/press-releases/offshore-wind-would-produce-twice-jobs-and-energy-offshore-drilling$