

**American Littoral Society • Center for Biological Diversity • Clean Ocean Action  
Concerned Citizens of Montauk • Environment New Jersey • Fishermen's Dock Co-Op  
Food & Water Watch • Grassroots Environmental Education • NJ Environmental Federation  
NJ Sierra Club • NY/NJ Baykeeper • Ocean Conservation Research • Oceana  
Paddleout.org • Pinelands Preservation Alliance • Raritan RIVERKEEPER  
Save Barnegat Bay • Sierra Club • Sierra Club Virginia Chapter  
Surfers' Environmental Alliance • Surfrider Foundation • WATERSPIRIT**

December 3, 2012

**Re: Request for Postponement of Proposed Geological and Geophysical Survey Decisions for Atlantic Ocean Offshore Oil and Gas Energy Development**

Dear Secretary Salazar;

**Our organizations are writing to you today to request that you cancel the proposed Atlantic Ocean Geological and Geophysical (G&G) Programmatic Environmental Impact Statement (PEIS), or, in the alternative, postpone the PEIS and resulting G&G program until a supplemental environmental impact statement can be developed that takes into account the devastated economies and decimated ecosystems of the Atlantic coast.**

On March 30, 2012, the Department of Interior announced that the Bureau of Ocean Energy Management (BOEM) had prepared a Draft PEIS to evaluate potential environmental effects of multiple surveys in the Mid- and South Atlantic Outer-Continental Shelf (OCS) planning areas. The public comment period has closed for this PEIS, and, according to BOEM, your decision is expected soon. In the aftermath of Hurricane Sandy, we ask that you reconsider.

From Florida to Maine, the Atlantic coast is in a state of emergency as communities and economies dig out from under the debris generated by Hurricane Sandy. Along many parts of the Atlantic coast, recovery is just getting underway and rebuilding is only distantly on the horizon. Cumulatively, Hurricanes Sandy, Lee, Irene, and others, along with nor'easters and other extreme weather events have battered some of the most densely populated parts of the U.S. coastline.

The industries and economies upon which many of these coastal states rely are facing a long road of recovery ahead. The impacts predicted from the G&G study would add unconscionable insult to injury.

For Atlantic Ocean fisheries, many commercial and recreational fishing organizations - as well as the State of New Jersey – have petitioned the Secretary of Commerce to declare a fishery disaster under the Magnuson Stevens Fishery Conservation and Management Act and the Interjurisdictional Fisheries Act. These communities have lost everything from boats and nets to ice machines and delivery infrastructure. Given the devastation inflicted on coastal fisheries, that request was recently granted.

Coastal tourism economies – from hotels and casinos to restaurants and amusement parks – have been crippled by these storms. In some cases, entire communities have been lost, closing countless businesses. Given that insurance and disaster aid programs in many coastal areas have not

even begun distributing recovery funds, the timeline for when these businesses will come back online is measured in months and years – not days and weeks.

Environmentally, neither short nor long term impacts from Hurricane Sandy can be determined at this time. Fuel spills, raw sewage, superfund site plumes, debris, contamination, household chemicals, and a host of other pollution discharges continue to impact our waterways, estuaries, and oceans. Remediation and pollution prevention activities across the region have been put on hold as funds have been diverted and environmental protection rules waived.

The proposed use of seismic airguns in the mid and south Atlantic alone is projected to injure 138,500 marine mammals and disturb their vital behaviors such as communicating, feeding or mating 13.5 million times, according to the Draft PEIS. This would include unacceptable levels of injuries and disturbances to critically endangered species, like the North Atlantic right whale (with a vulnerable population of less than 400 individuals) and sea turtles.

Given the state of the Atlantic coast, and the outlook for its future recovery, it would be an insult to these communities and economies if the government added on top seismic survey impacts, or, potentially, oil and gas development. First, at all levels of coastal governance priorities have been re-focused; agencies with which the BOEM may have expected to work on permitting, oversight, review, compliance, and enforcement are consumed with disaster recovery efforts, and will be spending the next several years rebuilding. Second, environmental, public-interest, and community organizations along the coast have, by necessity, turned away from fighting for the future and instead are focused on near-term public health and welfare.

Exploring for oil and gas activities when communities and citizens are least able to be meaningfully involved in decisionmaking is not good governance or leadership. It cannot be the platform your Department wants to rest upon.

Finally, in comments submitted to BOEM on the draft PEIS, the Mid-Atlantic Fishery Management Council wrote:

*“It is clear that G&G activities have substantial impacts on marine environments, yet the Draft PEIS provides insufficient information about how the specific proposed G&G activities may affect fish, marine mammals, benthic communities, and ecosystem structure and function. We understand that these impacts are difficult to predict or quantify, but given the existing value of marine resources to the region and the nation, it is clear that the potential benefits do not outweigh the risks of initiating the proposed G&G activities at this point.”*

The fisheries of the Mid-Atlantic Ocean are in the middle of an as-yet economically and environmentally unquantifiable disaster. Therefore, BOEM and the Department of Interior should heed the warnings of the Mid-Atlantic Fishery Management Council and not approve this data-deficient PEIS.

In fact, the Department of Interior has even suggested that there are alternatives to seismic airguns which are less harmful to marine life and fisheries, such as marine *vibroseis*, that were not included in the PEIS – meaning that this entire program plan not only fails to account for impacts, it fails to even consider Department-highlighted technological advancements.

Thus the untold economic and environmental disruption caused by extreme weather events (leading up to Hurricane Sandy) along the Atlantic Ocean coastline, and the vulnerable coastal

communities face years of rebuilding and recovery, are cause for you to cancel the proposed Atlantic Ocean G&G activities, the current PEIS process, and proposed oil and gas development within the Atlantic Ocean Basin.

Sincerely,

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