

Participating Organizations

Alliance for a Living Ocean
American Littoral Society
Arthur Kill Coalition
Asbury Park Fishing Club
Atlantic Highlands Arts Council
Bayside Regional Watershed Council
Bayshore Saltwater Flycodders
Belmont Seafood Co-op
Belmar Fishing Club
Beneath The Sea
Bergen Save the Watershed Action Network
Berkeley Shores Homeowners Civic Association
Cape May Environmental Commission
Central Jersey Anglers
Citizens Conservation Council of Ocean County
Clean Air Campaign, NY
Clean Water Action
Coalition Against Toxics
Coalition for Peace & Justice/Unplug Salem
Coastal Jersey Parrot Head Club
Communication Workers of America, Local 1075
Concerned Businesses of COA
Concerned Citizens of Bensonhurst
Concerned Citizens of COA
Concerned Citizens of Montauk
Eastern Monmouth Chamber of Commerce
Environment NJ
Fishermen's Conservation Association, NJ Chapter
Fishermen's Conservation Association, NY Chapter
Fishermen's Dock Cooperative, Pt. Pleasant
Food and Water Watch, NJ
Friends of Island Beach State Park
Friends of Liberty State Park, NJ
Friends of the Boardwalk, NY
Garden Club of Allenhurst
Garden Club of Bay Head and Mantoloking/Seaweeders
Garden Club of Brielle/Bayberry
Garden Club of Englewood
Garden Club of Fair Haven
Garden Club of Long Beach Island
Garden Club of RFD Middletown
Garden Club of Morristown
Garden Club of Navesink
Garden Club of New Jersey
Garden Club of New Vernon
Garden Club of Oceanport
Garden Club of Princeton
Garden Club of Ridgewood
Garden Club of Rumson
Garden Club of Sea Girt/Holly
Garden Club of Short Hills
Garden Club of Shrewsbury
Garden Club of Spring Lake
Garden Club of Terra Nova
Garden Club of Washington Valley
Great Egg Harbor Watershed Association
Green Party of Monmouth County
Green Party of New Jersey
Highlands Business Partnership
Hudson River Fishermen's Association
Jersey Shore Captains Association
Jersey Shore Parrot Head Club
Jersey Shore Partnership
Junior League of Monmouth County
Keyport Environmental Commission
Kiwanis Club of Shadow Lake Village
Leonardo Party & Pleasure Boat Association
Mantoloking Environmental Commission
Marine Trades Association of NJ
Monmouth Conservation Foundation
Monmouth County Association of Realtors
Monmouth County Audubon Society
National Coalition for Marine Conservation
Natural Resources Protective Association, NY
NJ Beach Buggy Association
NJ Environmental Lobby
NJ Friends of Clearwater
NJ Marine Education Association
Nottingham Hunting & Fishing Club, NJ
NYC Sea Gypsies
NY Marine Education Association
NY/NJ Baykeeper
Ocean Wreck Drivers, NJ
PaddleOut.org
Piscataway Saltwater Sportsmen Club
Raritan Riverkeeper
Religious on Water
Rotary Club of Point Pleasant
Rotary District #7540—Interact
Saltwater Anglers of Bergen County
Sandy Hook Bay Anglers
Save Barnegat Bay
Save the Bay, NJ
SEAS Monmouth
Shark Research Institute
Shark River Cleanup Coalition
Shark River Surf Anglers
Sierra Club, NJ Shore Chapter
Sisters of Charity, Maris Stella
South Monmouth Board of Realtors
Staten Island Tuna Club
Strathmere Fishing & Environmental Club
Sunrise Rod & Gun Club
Surfers' Environmental Alliance
Surfider Foundation, Jersey Shore Chapter
Surfider Foundation, South Jersey Chapter
TACK I, MA
Unitarian Universalist Congregation/Monm. Cnty.
United Boatmen of NY/NJ
Viking Village
WATERSPIRIT
Women's Club of Brick Township
Women's Club of Keyport
Women's Club of Long Branch
Women's Club of Merchantville
Women's Club of Spring Lake
Zen Society, NJ



*Ocean Advocacy
Since 1984*

Clean Ocean Action

www.CleanOceanAction.org

18 Hartshorne Drive, Suite 2
Highlands, NJ 07732-0505
T (732) 872 - 0111
F (732) 872 - 8041
Info@CleanOceanAction.org
Tax ID: 22-2897204

August 17, 2017

The Honorable Ryan Zinke
Secretary
United States Department of the Interior
1849 C Street, NW
Washington, DC 20240

Ms. Kelly Hammerle
National Program Manager
Bureau of Ocean Energy Management
U.S. Department of Interior
45600 Woodland Road
Mailstop VAM-LD
Sterling, VA 20166

RE: BOEM Request for Information and Comments on the Preparation of the 2019-2024 National Outer Continental Shelf Oil and Gas Leasing Program MAA 104000.

Dear Secretary Zinke and Ms. Hammerle,

This letter is in response to the federal register notice by the Bureau of Ocean and Energy Management (BOEM) announcing a new 5-year plan under the Outer Continental Shelf Oil and Gas leasing Program, and the formal Request for Information. These comments are submitted on behalf of Clean Ocean Action (COA), a regional, broad-based coalition of 125 conservation, environmental, fishing, boating, diving, student, surfing, women's, business, civic and community groups with a mission to improve the degraded water quality of the marine waters off the New Jersey/New York coast.

First and foremost, a new 5-year plan that would permit oil and gas drilling and development in the Atlantic Ocean is unwarranted and unacceptable. Restarting this process is a reversal of good governance; BOEM just completed a 5-year plan in January, which was to be in effect from 2017-2022. The response regarding the Atlantic Ocean was clear: nearly all comments were in opposition to opening the Atlantic Ocean to drilling. The Department of Interior and BOEM should respect due process and rescind the process calling for a new plan. This new over-lapping plan will also waste federal, state, and local tax-dollars as agency staff conduct reviews, assessments, and evaluations, and prepare comments and testimony.

In recognition that withdrawal is highly unlikely, given President Trumps Executive Order #13795, Implementing an America-First Offshore Energy Policy, COA categorically opposes the inclusion of the Atlantic Ocean in the 2019-2024 Draft Proposed Plan. Oil and Gas exploration (including seismic blasting which has a barbaric and devastating effect to marine life), development, and production has been emphatically and nearly universally condemned in the Atlantic Ocean. Thus, COA offers the following comments to the current Request for Information.



The Atlantic Ocean is rich in biological resources and includes unique oceanographic features such as estuaries, the Gulf Stream, deep canyons and shoals, and shallow offshore slopes of sand and gravel resources. Combined, these provide extraordinary natural capital, which is the basis of clean ocean economies in every Atlantic coastal state. For many states, these coastal economies are essential to the state's economic success. Therefore, BOEM should not include the Atlantic Ocean in the new 5-year OCS plan.

The New Jersey New York Bight

In particular, these comments focus on the ocean waters off the New Jersey and New York coasts, geologically known as the NY/NJ Bight or the "New York Bight." These waters include 19,000 square miles of unique geological, hydrological, physical characteristics. For example, the region contains the Hudson Canyon, an extension of the Hudson River – during the ice age, when water levels were much lower, river systems cut this canyon into the continental shelf. Starting in the NY/NJ Harbor, the canyon runs for miles out to sea – from the Hudson Shelf Valley to the Hudson Canyon itself where the canyon reaches depths of 2,500 meters. This rare geological formation contains a remarkable diversity of deep-sea life, including extensive and complex deep sea coral and sponge formations. The canyon provides an over-wintering area for a large number of fish species, such as summer flounder, black sea bass and tilefish. Sport fishermen and researchers come from all over the world to fish in and explore the canyon where the deep water drives many open-ocean species close to shore, and the [unique ecosystem](#) is a hotbed of new marine biology and oceanographic research.

Extraordinary Ecological Resources

The NY/NJ Bight is a rich and diverse region of the ocean unlike any other. The major driving force for much of the ecology of the region is the confluence of the Labrador Current which brings cold water from the North Atlantic, and the Gulf Stream which brings warm water from the Gulf of Mexico and the tropics. These currents also make the region home to a wide variety of species – from plankton that thrive in nutrient-rich cold waters to top-predators, such as tuna or right whales which migrate through the NY/NJ Bight in search for food. These currents also make the region susceptible to pollution or spills from any oil and gas exploration or development to the north or south of the region.

Of NJ's 21 counties, 17 border on salt water and regionally host many estuaries and bays including: Gardiners Bay, Great Peconic Bay, Jamaica Bay, and Hudson Estuary, in New York. As for estuaries in New Jersey, there are the Raritan Estuary, Sandy Hook Bay, Barnegat Bay, Great Egg Harbor Bay, Little Egg Harbor Bay, Cape May Harbor estuary and Delaware Bay, to name a few. Due to their national significance, several are protected and managed under the National Estuary Program, including Peconic Bay, the Hudson Raritan Estuary, Barnegat Bay Estuary, and the Delaware Bay Estuary.

These unique currents and estuaries of the New York and New Jersey coast sustain an ecosystem that is one of the most vibrant in the nation. According to the US Fish and Wildlife Service, it "...has one of the highest diversities of marine mammals and sea turtles reported anywhere in the US and supports many threatened and endangered species..."

Consider the following:

- There are 33 species of whales and dolphins.
 - Six whales are endangered including the Sperm, Fin, Sei, Blue, Humpback, and one of the most endangered marine mammals, the Right Whale
 - One small cetacean, the Harbor Porpoise, is endangered.
- Five species of sea turtles occur in the mid-Atlantic United States, all of which are listed as threatened or endangered under the Endangered Species Act.
- Four species of seals are winter residents in the region.
- Over 300 species of fish, including the endangered Short-nose Sturgeon.
- Nearly 350 species of birds inhabit the region annually. The coastal wetlands and shoreline habitats from Cape May to Montauk are attractive stopover points for countless species of migratory fish and birds. Several bird species are endangered or threatened, including piping plovers, least terns, common terns, and red knot.
- Hundreds of other species thrive and provide a rich diversity of life in this region, including crabs, squid, and sea stars. One in particular deserves mentioning, the horseshoe crab. This marine arthropod is a keystone species and, as such, many other species depend upon it, including humans. Its blood has an antibody which is used to test the safety of vaccines before they are injected into people. There is no other alternative that works as well. Horseshoe crabs are declining in numbers and the south Jersey Delaware Bay region hosts the largest concentration of horseshoe crabs. They depend on clean beaches; an oil spill could destroy the habitat for many years.

This is just a snap shot of the rich life and coastal resources that sustain the extraordinary, intrinsic and economic value to the NY/NJ Bight. Based on this information, it is clear BOEM must not move forward with the new 5-year OCS 2019-2024 plan.

Economic Value of a Clean Ocean Economy

NJ is based on a clean ocean economy. Tourism revenues generated by the shore are roughly \$32 billion and are the lifeblood of the state's economy. For example, Tourism Economics, a research company, evaluated [New Jersey's 2016](#) tourism data. The study stated that, "including indirect and induced impacts, tourism in New Jersey generated \$4.9 billion in state and local tax revenues. Without the tourism industry, New Jersey households would each need to pay \$1,525 [annually] in order to maintain the current level of state and local government services."

Recreational fishing expenditures in 2014, totaled some \$1.4 billion and total trips and durable goods sales was \$1.7 billion. In that same year, jobs in the recreation fishing industry totaled nearly 20 million. Many businesses are independently owned.

In the Mid-Atlantic region, NJ had the second highest commercial landing revenue of \$152 million, but earned the most from shellfish in 2014. New Jersey is one of the leading suppliers of surf clams and ocean quahogs to both the nation and the world. NJ's commercial fishing seafood industry's total economic value added is \$277 million and landing totaled about \$152 million. The NJ Commercial Seafood Industry accounts for nearly \$7.3 million jobs and most are independently owned and multi-generational.

New Jersey's boating sales in 2015 -- the latest year for which figures are available -- totaled \$310 million, up 6.1 percent from the previous year and includes sales of power boats, engines, trailers, accessories, and other boat-related purchases. In 2014, The NJ boating industry supports nearly 12,000 jobs and more than 1,000 small businesses, according to the Nation Marine Manufacturers Association. Overall, recreational boating in New Jersey has an economic impact on the state of \$2.2 billion a year in 2012.

Property values along the shore are some of the highest in the state and in total would likely exceed a trillion dollars. An oil-washed beach or industrial shoreline would devastate property values.

Cultural and Public Interest

The NY/NJ shore experiences are iconic. Citizens around the country and the world treasure their times on the boardwalk, amusements, restaurants, walks along the shore, and picnics on the beach with family and friends. The livelihoods and quality of life for millions of citizens depend upon a clean ocean and the clean ocean economy.

The identity of each and every town varies along the coast but all are tied to the ocean and the marine resources. School team mascots, town emblems and symbols are tied to the coast and ocean. The communities and businesses all are sustained and thrive on a wholesome, family-friendly coastal-themed clean ocean economy. There is not room for dirty industrial fossil fuel activities that would threaten local public health and lead to harmful ocean industrialization. Indeed, they would be most unwelcome.

All of these valuable experiences would be at risk from oil and gas, exploration, development, and production. There is nothing clean about the oil and gas industry.

Based on this information, BOEM must not move forward with the new 5-year OCS 2019-2024 plan.

The Oil and Gas Industry is Dirty

Proof of the pollution from oil and gas drilling can be seen in the Gulf of Mexico. The fossil fuel-based economy pollutes the coast, and offshore oil rigs leak and pollute the ocean. The devastating consequences of spills, especially the BP Horizon spill, have been catastrophic to the Gulf. Scientists are still finding harmful impacts to the marine life which affects the fishing and tourism communities there.

The image below reflects how extensive the impact of the BP Horizon oil spill would be in the Atlantic Ocean.



For decades past spills have devastated communities, many of which have never recovered. We cannot take that risk. BOEM should include in its review of information the devastation caused by historic spills in the Pacific, off Alaska, and in the Gulf of Mexico. The oil is not worth the risks.

Climate Change is Real

Every drop of oil and gas burned will accelerate climate change and put our coast at even more risk from sea surges and sea level rise. These costs and impacts, including the adaptation, mitigation, and resiliency from rising sea levels, must be considered.

Expanding offshore drilling will move America away from conservation, efficiency, and renewable energy. A job-rich future in conservation, efficiency, and renewable energy provides permanent long term jobs. The job-poor fossil fuel industry is a boom and bust economy, and is short term.

Only Big Oil Benefits

Finally, the reckless pursuit of offshore oil and gas development under the guise of an America-first strategy is a false promise. Any oil and gas extracted will be sold by private companies to the highest bidder on the world market. This in no way makes America energy-independent. In fact, under this Administration, sales of American crude oil to China have increased dramatically. According to data from the Energy Information Agency, in February 2017, China was the largest buyer of American light crude oil. This indicates that there is more interest in selling U.S. oil reserves to the highest bidder to primarily enrich Big Oil assets, rather than in reducing our Nation's dependence on imports.

United We Stand

This ocean region was once the Ocean Dumping Capitol of the World with eight ocean dumpsites. Water quality was putrid with medical waste, raw sewage, oil and other chemicals. Citizens and elected leaders united to turn the tide, and today, thanks to hard work and key investments, the region is an international coastal vacation destination. Going back is not an option.

Today, keeping the ocean clean and healthy in New Jersey is a non-partisan issue. The vast majority of NJ's elected leaders, towns, citizens, businesses and organizations all stand against offshore industrialization. In fact, every NJ Governor since Tom Kean (1982-1990) has steadfastly opposed offshore drilling. Many were Atlantic Ocean Champions and urged other Governors to do same. Most recently, Governor Chris Christie voiced his strong opposition to drilling not just off the Jersey Shore, but anywhere in the North Atlantic or Mid-Atlantic region where drilling may harm NJ.

Every US Senator elected in New Jersey since the 1980's has opposed offshore drilling in the Atlantic and/or off New Jersey, as has the vast majority of NJ's congressional delegation on both sides of the issue. Most, if not all, 70 coastal towns oppose offshore drilling.

The vast majority of citizens also oppose offshore oil and gas development. A poll taken in 2010 showed about 70% of NJ citizens opposed drilling and that was taken before the BP Horizon Oil Blow-out and resulting massive spill.

Clean Ocean Action has been collecting signatures for years in support of the NJ/NJ Bight becoming federally designated as the “Clean Ocean Zone,” which would prohibit any harmful industrialization, including offshore oil and gas development. Over 50,800 people have united for the COZ and nearly 200 organizations support the effort. In addition, many coastal towns support the initiative to finally lock-in ocean protections that have been achieved over the years.

More recently, in just a 7-day period, COA has collected nearly 1000 petitions (on line and on paper) opposing offshore drilling.

In sum, based on the above information, facts, and details, Clean Ocean Action urges BOEM to abandon pursuit of the new National OCS Oil and Gas Leasing Plan for 2019-2024. In the likely event that BOEM moves forward, the Atlantic Ocean in general and specifically any regions which would potential affect the New Jersey/New York Bight should not be included in the plan. Oil and gas exploration, development and production would put our coastal resources, environs and economies at grave and unacceptable risk.

On behalf of the coalition,



Cindy Zipf
Executive Director