

Participating Organizations

- Alliance for a Living Ocean
- American Littoral Society
- Arthur Kill Coalition
- Asbury Park Fishing Club
- Bayberry Garden Club
- Bayshore Regional Watershed Council
- Bayshore Saltwater Flyrodiers
- Belford Scafood 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
- Coalition Against Toxics
- Coalition for Peace & Justice/Unplug Salem Coast Alliance
- Coastal Jersey Parrot Head Club
- Communication Workers of America, Local 1034
- Concerned Businessess of COA
- Concerned Citizens of Bensonshurst
- Concerned Citizens of COA
- Concerned Citizens of Montauk
- Eastern Monmouth Chamber of Commerce
- Fisher's Island Conservancy
- Fisheries Defense Fund
- Fishermen's Dock Cooperative, Pt. Pleasant
- Friends of Island Beach State Park
- Friends of Liberty State Park, NJ
- Friends of the Boardwalk, NY
- Garden Club of Englewood
- Garden Club of Fair Haven
- Garden Club of Long Beach Island
- Garden Club of 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 Short Hills
- Garden Club of Shrewsbury
- Garden Club of Spring Lake
- Garden Club of Washington Valley
- Great Egg Harbor Watershed Association
- Highlands Business Partnership
- Highlands Chamber of Commerce
- Hudson River Fishermen's Association/NJ
- Jersey Coast Shark Anglers
- Jersey Shore Captains Association
- Jersey Shore Running Club
- Junior League of Monmouth County
- Keyport Environmental Commission
- Kiwanis Club of Manassgan
- Kiwanis Club of Shadow Lake Village
- Leonardo Party & Pleasure Boat Association
- Leonardo Tax Payers Association
- Main Street Wildwood
- Marine Trades Association of NJ
- Monmouth Conservation Foundation
- Monmouth County Association of Realtors
- Monmouth County Audubon Society
- Monmouth County Friends of Clearwater
- Montauk Fisherman's Emergency Fund
- National Coalition for Marine Conservation
- Natural Resources Protective Association, NY
- NJ Beach Buggy Association
- NJ Commercial Fisherman's Association
- NJ Environmental Federation
- NJ Environmental Lobby
- NJ Main Ship Owners Group
- NJ Marine Educators Association
- NJ PIRG Gitzzen Lobby
- Nottingham Hunting & Fishing Club, NJ
- NYC Sea Gypsies
- NY Marine Educators Association
- NY/NJ Baykeeper
- Ocean Wreck Divers, NJ
- PaddleOut.org
- Picatinny Saltwater Sportsmen Club
- Raritan Riverkeeper
- Religious On Water
- Riverside Drive Association
- Rotary Club of Long Branch
- Rotary District #7510 - Interact
- Saint George's by the River Church, NJ
- Saltwater Anglers of Bergen County
- Sandy Hook Bay Anglers
- Save Barnegat Bay
- Save the Bay, NJ
- SEAS Monmouth
- Seaweeders Garden Club
- Shark Research Institute
- Shark River Cleanup Coalition
- Shark River Surf Anglers
- Shore Adventure Club
- Shore Surf Club
- Sierra Club, Shore Chapter
- Soroptimist Club of Cape May County
- South Jersey Dive Club
- South Monmouth Board of Realtors
- Staten Island Friends of Clearwater
- Staten Island Tuna Club
- Strathmere Fishing & Environmental Club
- Surfers' Environmental Alliance
- Surfrider Foundation, Jersey Shore Chapter
- TACK I, MA
- Terra Nova Garden Club
- Unitarian Universalist Congregation /Monm. Cty.
- United Boatmen of NY/NJ
- United Bowhunters of NJ
- Volunteer Friends of Boaters, NJ
- WATERSPIRIT
- Women's Club of Brick Township
- Women's Club of Keypport
- Women's Club of Long Branch
- Women's Club of Merchantville
- Zen Society, NJ

Clean Ocean Action



Ocean Advocacy
Since 1984

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VIA POST and INTERNET at <http://www.mms.gov/5-year/2007-2012main.htm> .

**Renee Orr, 5-Year Program Manager
U.S. Department of the Interior, Minerals Management Service
381 Elden Street, Room 3120
Herndon, VA 20170**

RE: Comments on Proposed 5-Year Outer Continental Shelf (OCS) Oil and Gas Leasing Program for 2007-2012

Dear Ms. Orr:

Please accept these comments of Clean Ocean Action coalition and NY/NJ Baykeeper, (hereafter, "Commenters") on the above-referenced Proposed 5-Year Outer Continental Shelf (OCS) Oil and Gas Leasing Program for 2007-2012) issued August 25, 2006.¹

Clean Ocean Action (hereinafter "COA") is a broad-based coalition of 150 conservation, environmental, fishing, boating, diving, student, surfing, women's, business, service, and community groups. Our goal is to improve the degraded water quality of the marine waters off the New Jersey/New York coast. It is COA's mission to investigate, review, and question proposals that may affect ocean water quality in the NY/NJ Bight.²

New York New Jersey Baykeeper is a conservation organization, with a mission to protect, preserve and restore the ecological integrity of the Hudson-Raritan Estuary.

The MMS Proposed 5-Year Outer Continental Shelf (OCS) Oil and Gas Leasing Program for 2007-2012 (hereinafter "Proposed Leasing Program") includes the Mid-Atlantic Planning Area, which is off the Virginia Coast. Inclusion of this area flies in the face of 25 years of good governance policies to protect environmentally sensitive areas, violates current moratoria, and puts the regional economic and environmental productivity and potential at risk. In short, the Commenters strongly oppose the Department's inclusion of the Mid-Atlantic Region in the listed proposed program areas, and respectively demand that the Department remove the Mid-Atlantic region from the Proposed Leasing Program. The basis for this request follows.

¹ 71 Fed. Reg. 7064

² Visit <http://www.cleanoceanaction.org> for more information.

Violation of Long-Standing Moratoria

The waters of the Mid-Atlantic coast have been proactively defended and protected by an annual congressional prohibition on new offshore oil and gas leasing for over 25 years. These same waters have also been protected since 1990 by a separate Executive Order put in place by former President George W. Bush, Sr., and subsequently extended by President Clinton to the year 2012.³ Although the Proposed Leasing Program explicitly states, “[t]here will be no leasing of such areas unless the President chooses to modify the withdrawal and Congress discontinues the annual statutory moratoria,” including the Mid-Atlantic as a proposed program area establishes an unacceptable, and possibly illegal, path. The congressional moratorium in place for the Mid-Atlantic prohibits the use of appropriated funds for “leasing, pre-leasing, and related activities.” At the November 13, 2006 public meeting on the Proposed Leasing Program held by Mineral Management Service (MMS) in Atlantic City, NJ, the current phase of the process was identified as a “Pre-Leasing Activity”. Therefore, the use of federal resources to develop and market the Proposed Leasing Program and the corresponding draft Environmental Impact Statement (EIS) are clearly within this definition of prohibited activities. **Consequently, this proposal is in violation of the moratoria.**

Mid-Atlantic: A Unique Ecosystem

Oil and/or gas exploration or activities are proposed off the coast of Virginia. This region is an extraordinarily important ecosystem, which is why for the past 25 years, Congress and Presidential Moratoria have been imposed. In fact, there are eleven National Wildlife Refuges in the coastal region from Virginia to New York protecting thousands of acres of coastal wetland and tidal marshes that are considered critical feeding habitat for millions of migratory birds that travel the Atlantic Flyway. The coastline of Virginia itself is lined with barrier islands designated by the U.S. Fish and Wildlife as an International Shorebird Reserve and by the United Nations as a World Biosphere Reserve. The close proximity of the proposed oil and gas operations threatens the coastal habitat and waters of the entire region.

Moreover the proposed area is less than 75 miles from the southern tip of New Jersey, which begins the New York/New Jersey Bight, an ecologically rich and unique marine system. The New York/New Jersey Bight (Bight) is defined as the oceanic region from Montauk, NY to Cape May Point, NY and off to the edge of the continental Shelf. The warm waters of the Gulf Stream travel up the eastern coast from the Caribbean passing through the Bight to meet the cold waters of the north Atlantic off Canada. This remarkable ocean river brings biologically rich southern waters thus contributing to the marine environment of the Bight by increasing the diversity of oceanographic conditions and species. The region supports more than 300 species of fish, nearly 350 species of birds, 7 species of sea turtles, and many marine mammals, such as 10 species of whales and several species of seals and porpoises. The draft EIS developed by MMS as part of the Proposed Leasing Program, ranked the proposed region first in primary production from marine phytoplankton, with almost 140 million metric tons of carbon/year⁴, thus acknowledging the importance of this region to the base of the oceanic food web. However, it is also true that while the hydrological currents present in the Mid-Atlantic region create a unique

³ Congressional Research Service, OCS Leasing Moratoria, 97-588 ENR.

⁴ “Outer Continental Shelf Oil and Gas Leasing Program 2007-2012, Draft Environmental Impact Statement,” July 2006, Page 87, U.S. Department of the Interior, Minerals Management Service.

and diverse marine environment, these same currents would carry pollutants directly to the shorelines north of the leasing area, including the beaches of New York and New Jersey.

The risks from exploring, developing and extracting potential oil and gas are high, significant, and dangerous for New Jersey and New York's marine ecosystems and their dependant economies.

Ecological Risks:

Exploring and drilling for oil and gas resources is a complex process, which requires miles of pipelines, numerous tankers plying coastal waters, and many refineries. Oil and gas activities not only impact federal and state waters where platforms are located, but the land along the coast as well. In addition, "the biological consequences of such development, whether offshore, in the coastal zone, or on-land, can be acute or chronic, resulting from pollution or physical alteration of habitat."⁵ These potential impacts include, but are not limited to:

- Unintentional releases of oil and gas from production or transportation facilities. Such releases can range from catastrophic spills to the release of smaller quantities of materials into the ocean;
- The risk of spills and leaks from oil platforms increase with hurricanes. For example, widespread and persistent oil slicks emanating from many platforms in the Gulf of Mexico occurred after Hurricane Katrina in 2005.⁶
- Routine releases of toxic metals, oil, gas, and byproducts (i.e., "drilling muds" and "cuttings") from exploration and production;
- Disturbance and destruction of the ocean benthic or bottom environment, including the smothering of benthic organisms;
- Increased incidence of collisions between endangered marine mammals and tanker and support ships,
- Release of "produced waters" from offshore activities, which contain very substantial amounts of oil and grease, as well as heavy metals, toxic organics and a variety of highly toxic additives, which can create acute and chronic toxicity problems; and
- Onshore impacts, including extensive wetlands loss from the construction of onshore facilities and related structures.⁷

The negative impacts listed above, as well as others, could lead to serious damage or destruction of New York and New Jersey's marine and coastal resources, which are of extreme ecological value.

Economic Importance and Risk:

The waters of the Bight also support significant economic and social values, which could be seriously damaged by offshore oil and gas activities, including commercial fishing, commercial shell-fishing, recreational fishing, recreational boating, water recreation, whale-watching, and shore tourism. For example, the summers of 1987 and 1988 provide stark

⁵ Bolze, Dorene, and Mercedes Lee. 1989. *Offshore Oil and Gas Development: The Ecological Effects Beyond the Offshore Platform*, Proceedings from Sixth Symposium on Coastal and Ocean Management/ASCE, July 11-14, 1989, Charleston, SC.

⁶ Information available at <http://www.skytruth.com/>(last visited April 10, 2006).

⁷ Minerals Management Service, <http://www.homr.mms.gov/homepg/ofshore/atlocs/atlocs.html>, 7/16/03.

evidence of water quality's link to state and local economies. During this time, raw sewage, medical waste, dead and dying dolphins washed ashore in the bi-state region. When all indirect effects of the 1988 event are included, losses were estimated at \$820.7 million to \$3.8 *billion* [in 1987\$].⁸ Specific economic values of the marine resources of the NY/NJ Bight are described below.

- **Commercial Fishing:** In New Jersey, “[a]nnual commercial landings of finfish and shellfish are over 182 million pounds with an approximate dockside value of \$100 million,” according to the New Jersey Department of Environmental Protection (NJDEP), Coastal Management Program,⁹ thus generating \$100 million to the New Jersey economy annually.¹⁰ For 1999, the New York Sea Grant study estimated that New York’s commercial fishing industry contributed a total of \$149.6 million to the state’s economy and directly employed approximately 10,500 New Yorkers.”¹¹
- **Recreational Fishing:** In 2003, the American Sportfishing Association estimated that recreational fishing brought \$724,634,011 in retail sales with a total multiplier effect¹² of \$1,363,259,834 to the state of New Jersey.¹³ Recreational fishing accounts for 12,021 jobs in New Jersey, with salaries and wages totaling \$328,359,434.¹⁴ The sport generates \$7,750,295 in New Jersey income taxes and \$56,339,961 in federal income taxes.¹⁵ The same report indicates that recreational fishing in New York generated \$1,116,861,525 in retail sales with a total multiplier effect of \$2,011,716,251.¹⁶ The sport accounts for 17,083 jobs and \$503,486,172 in salaries and wages in New York.¹⁷
- **Surfing:** Residents in Monmouth County, NJ contributed at least \$10 million to the economy from surfing and associated businesses (includes purchasing equipment, wax, bathing suits, wet suits, parking fees, beach badges, breakfast, and lunch).

⁸ Ofiara, Douglas D. and Bernard Brown, “Marine Pollution Events of 1988 and Their Effect on Travel, Tourism, and Regional Activities in New Jersey,” referenced as an “Invited Paper presented at the Conference on Floatable Wastes in the Ocean: Social Economic and Public Health Implications. March 21-22, 1989 at SUNY- Stony Brook.”

⁹ The New Jersey Coastal Management Program, “Fact Sheet 2, March 2002,” p.1.

¹⁰ The New Jersey Coastal Management Program, “Fact Sheet 3, March 2002,” p.1.

¹¹ New York Seafood Council, “New York’s Seafood Industry” by Ken Gall, New York Sea Grant, Stony Brook, NY. Available at http://www.nyseafood.org/doc.asp?document_key=NYSeafoodIndustry#commercial (last visited July 14, 2005).

¹²“Multiplier” is defined as “An effect in economics in which an increase in spending produces an increase in national income and consumption greater than the initial amount spent. For example, if a corporation builds a factory, it will employ construction workers and their suppliers as well as those who work in the factory. Indirectly, the new factory will stimulate employment in laundries, restaurants, and service industries in the factory's vicinity,” *The New Dictionary of Cultural Literacy*, Third Edition, Houghton Mifflin Company, 2002. Available at *Answers.com* 26 Oct. 2005. <http://www.answers.com/topic/multiplier-effect>.

¹³ American Sportfishing Association, Fishing Statistics, “Economic Impacts of Fishing” available at http://www.asafishing.org/asa/statistics/economic_impact/state_allfish_2003.html (last visited July 14, 2005).

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ American Sportfishing Association, Fishing Statistics, “Economic Impacts of Fishing” available at http://www.asafishing.org/asa/statistics/economic_impact/state_allfish_2003.html (last visited July 14, 2005).

¹⁷ *Id.*

- **Tourism:** According to the New Jersey Department of Commerce, travel and tourism in New Jersey contributes \$32 billion in economic activities each year and generates 416,000 jobs (the second largest private sector employer). The four coastal counties – Atlantic, Cape May, Ocean, and Monmouth – account for more than 72% or \$21.6 billion in annual economic activity in New Jersey.¹⁸ In 1995 (the most recent numbers accessible), coastal tourism in New York contributed \$2.9 billion to the overall economy, comprising 62.5% of the state economy.¹⁹

These economic numbers are especially telling when compared to the total estimated net benefits of anticipated production from the proposed lease sale. MMS estimates the sale to *potentially* generate \$340 million dollars, which is dwarfed by the billions of dollars of real world economic vitality of marine related commerce in the region.

Therefore, the commenters reject and challenge the assessments and risk assessments conducted by MMS.

Public and Government Opposition

Numerous federal and state elected officials and citizens have firmly and continuously opposed oil and gas development off the coast of New York and New Jersey, as is evidenced by the existing moratoriums, and the numerous bills introduced in opposition of offshore oil and gas drilling. Importantly for state’s rights, comments submitted by New Jersey Governor Jon Corzine were strongly opposed to the Proposal and in light of the Moratoria, questioned the legality of this MMS activity. Indeed nearly the entire New Jersey U.S. Congressional delegation vehemently oppose Outer Continental Shelf development, in general and especially in the Atlantic where they have sustained the Moratoria for over 25 years. Today these representatives include: US Senators Robert Menendez and Frank Lautenberg, and US Representatives Robert Andrews, Frank LoBiondo, James Saxton, Christopher Smith, Frank Pallone, Mike Ferguson, William Pascrell, Jr., Steven Rothman, Donald Payne, and Rodney Frelinghuysen. In addition, state officials and many municipalities object to the development of the Outer Continental Shelf.

A Drop in the Bucket- Proposal is Poor Judgment and Bad Governance:

MMS’ proposed program areas were purportedly chosen because they “warrant further study and analysis based on oil and gas resource estimates and comments received in response to the August 24, 2005 Request for Information.” After reviewing MMS estimates on oil and gas potential, it is inconceivable how this determination was made..

In short, the oil and gas potential would last approximately *two and seven days, respectively*. Studies have shown that minuscule amounts of oil or gas are economically available in the Mid-Atlantic region. Using 2030 national consumption rates (the year production is expected to begin), MMS estimates that the proposed lease area off Virginia contains only

¹⁸ NJ Commerce, Economic Growth and Tourism Commission, “Frequently Asked Questions: Tourism in New Jersey,” prepared for consideration by the Blue Ribbon Panel on Offshore Wind, April 2005.

¹⁹ Coast Alliance, “State of the Coasts: A State-by-State Analysis of the Vital Link between Healthy Coasts and a Healthy Economy,” p.109, June 1995.

enough recoverable oil to last between 1.8 and 2.9 days,^{20,21} and only enough natural gas to last between 3.4 to 6.8 days^{22,23}. The recovery of such small amounts of oil and gas is not an economically or ecologically viable option, and more importantly, would put at risk the active economic and ecologic productivity and potentialities of the natural resources in the region.

The public relies on government officials to make sound policies based on scientific fact and risk management. To consider such invasive and ecologically risky (not to mention that it is clearly economically infeasible) activities for such small amounts of potential oil and gas is reckless, at best.

MMS Virginia Proposal Conflicts with Department of Defense:

The entire Mid-Atlantic Planning Area lies within (see map attached) the U.S. Navy's Virginia Capes Operations Area (hereinafter "VACAPES"). The U.S. Navy currently conducts training and war exercises within the Mid-Atlantic Planning Area that utilize several different forms of live ammunition including gunnery exercises, airborne mine countermeasures, general subsurface operations, autonomous underwater vehicle from submarines, surface-to-air weapon delivery such as strafing, rockets and bombs, and antisubmarine rocket and torpedo firing²⁴. In addition, Air Force activities in the proposed area include readiness training for tactical fighters and interceptor aircrafts, refueling operations, basic fighter 100 maneuvering, air combat training, and air-to-air intercepts²⁵ and National Aeronautics and Space Administration (hereinafter "NASA") operates a research range off of Virginia's Eastern Shore²⁶. These activities involve sub-surface, surface and air exercises. As stated in the draft EIS, the U.S. Navy finds that oil and gas activities in the area "have the potential to interfere with or interrupt exploration and drilling operations²⁷". In their comment letter to MMS on the draft Program Plan, the U.S. Navy further elaborates the real danger of these conflicting operations by stating that "hazards in this area to operating crews and oil company equipment and structures would be so great, the U.S. Navy opposes oil and gas exploration and development in the program location²⁸" Naval training exercises and oil and gas activities are mutually exclusive and in direct conflict, as the use of live ordnances and subvert underwater activity creates a substantial risk to oil and gas exploration and production activities that dramatically increase the likelihood of a major oil spill or other catastrophe. This alone should eliminate the Mid-Atlantic Planning Area from further consideration by MMS.

²⁰ "Annual Energy Outlook 2006", Table 24. U.S. Department of the Interior, DOI/EIA 0383, Feb. 2006.

²¹ "Outer Continental Shelf Oil and Gas Leasing Program 2007-2012, Draft Environmental Impact Statement," July 2006, Table IV-3, U.S. Department of the Interior, Minerals Management Service.

²² "Annual Energy Outlook 2006", Table 23. U.S. Department of the Interior, DOI/EIA 0383, Feb. 2006.

²³ "Outer Continental Shelf Oil and Gas Leasing Program 2007-2012, Draft Environmental Impact Statement," July 2006, Table IV-3, U.S. Department of the Interior, Minerals Management Service.

²⁴ "Proposed Program Outer Continental Shelf Oil and Gas Leasing Program 2007-2012" August 2006, Page 99, U.S. Department of the Interior, Minerals Management Service.

²⁵ *Id*

²⁶ *Id*

²⁷ "Outer Continental Shelf Oil and Gas Leasing Program 2007-2012, Draft Environmental Impact Statement," July 2006, Page IV-2, U.S. Department of the Interior, Minerals Management Service.

²⁸ U.S. Department of the Navy, Letter to Minerals Management Service regarding the draft Proposed 5-year Outer Continental Shelf Oil and Gas Leasing Program for 2007-2012. April 10, 2006. MMS Comment ID # 5YR-HQ-0006-C00D1864

As a result, this region endures many maneuvers and ordnance activities, which can be harmful to marine life. While these warrant review and concern, it is absolute that they are incompatible with the MMS Proposal. Indeed, in April 2006, Assistant Secretary to the Navy (Installations and Environment), Donald R. Schregardus, submitted comments as the Defense Department Executive Agent for OCS matters, on the DRAFT Proposed Leasing Program. In his letter he clearly stated,

“Because hazards in this area to operating crews and oil company equipment and structures would be so great, the U.S. Navy opposes oil and gas exploration and development in the program location²⁹”

It is difficult to understand why MMS ignored these critical concerns and continues to pursue an activity that the Department of the Defense clearly opposes.

Boundary Issues Highly Objectionable:

We further reject the new boundaries of the four Atlantic Ocean Planning Areas. These new boundaries appear to correspond to the State offshore administrative boundaries published by MMS in January (i.e., the southerly boundary of the Mid-Atlantic Planning Area is identical to the state boundary shared by the Carolinas). See 71 Fed. Reg. 127. This is highly objectionable. First, these State boundaries were not formally adopted by rule and therefore were not subject to public comment. Secondly, the State boundaries were based upon “equidistant lines” and “geodetic calculations”, see id., and not environmental or biological factors, such as current, wind, fish migration patterns, etc. Third, the State boundaries were drawn in part to limit the number of “affected States” for any given action. See id. Finally, the State boundaries were expressly drawn for alternative and renewable energy projects. In light of various moratoriums and Presidential withdrawals, use of these State boundaries for oil and gas activities would appear to be unauthorized.

With regard to the only contemplated lease in any of the Atlantic Ocean Planning Areas, we are greatly concerned that MMS that will use these new boundaries to discount the policies and concerns of New Jersey because it is no longer in the Mid-Atlantic Planning Area. Such a short-sighted approach would ignore the fact that New Jersey is a mere 70 miles from the proposed lease area, and various environmental and biological factors such as the gulf stream and fish movement may make activity offshore in Virginia a greater threat to New Jersey water than activity off the coast of other states in the North Atlantic Planning Region.

In conclusion:

Based on above described concerns and rationale, the Commenters urge MMS to rescind the Mid-Atlantic area from the Proposed Leasing Program. This region is under Congressional moratoria and Presidential withdrawal, is opposed for development by important federal agencies, and, most importantly, is an area that is economically and environmentally dependant upon a clean coast and ocean waters.


²⁹ U.S. Department of the Navy, Letter to Minerals Management Service regarding the draft Proposed 5-year Outer Continental Shelf Oil and Gas Leasing Program for 2007-2012. April 10, 2006. MMS Comment ID # 5YR-HQ-0006-C00D1864

Please send any correspondence to Clean Ocean Action, PO Box 505, Sandy Hook, NJ 07732, or email at science@cleanoceanaction.org. We will distribute to listed parties.

Sincerely,



Cindy Zipf
Executive Director



Jennifer Samson, Ph.D.
Principal Scientist

Signature on hard copy.

Andrew Willner
Executive Director
NY/NJ Baykeeper

cc: NJ US Congressional Delegation
open letter