December 20, 2018

Ms. Donna Wieting
Director, Fisheries Office of Protected Resources
National Oceanic and Atmospheric Administration
1315 East-West Highway
13th Floor
Silver Spring, MD 20910

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

Dear Ms. Wieting and Ms. Hammerle:

We, the Mid-Atlantic states of New York, New Jersey, Delaware, Maryland, and Virginia, collaborating under the Mid-Atlantic Regional Council on the Ocean (MARCO) are writing in opposition to the Administration’s ongoing pursuit of oil and gas activities in federal waters off the Mid-Atlantic coast. This includes seismic testing permits that recently received their final authorization for activities across a wide swath of ocean south of New Jersey, and the development of a new 2019-2024 National Outer Continental Shelf Oil and Gas Leasing Program (National OCS Program) that may provide for further oil and gas activities off our States. The draft National OCS Program was published by the Bureau of Ocean Energy Management (BOEM) in the Federal Register on January 8, 2018 and will replace the current 2017-2022 Program.

It is our understanding that a final authorization was issued on November 30, 2018 under the Marine Mammal Protection Act for the incidental harassment of marine mammals, and associated mitigation measures, by companies proposing to conduct geophysical surveys in support of hydrocarbon exploration in the Atlantic Ocean. This is a troubling step forward to potential oil and gas leasing in the Mid-Atlantic region and we remain firmly opposed to including unleased areas off the coasts of the five Mid-Atlantic states in the 2019-2024 National OCS Program. As all 5 Governors of the Mid-Atlantic states have made clear in previous comments submitted during this process, offshore drilling threatens our coastal economy and environment, yet offers little economic benefit to the Mid-Atlantic states. The economy of coastal counties in the Mid-Atlantic states employed 12.7 million people in 2016, contributing $2.1 trillion to the U.S. economy and paying $848.8 million in wages. We cannot afford to put at risk the coastal natural resources and economies of the Mid-Atlantic states.
As such, we the 5 Mid-Atlantic states continue to oppose the inclusion of the Mid-Atlantic region in the 2019-2024 National OCS Program and any seismic testing efforts associated with future oil and gas exploration or development activities in the waters off our States. New York, New Jersey, Delaware, Maryland, and Virginia remain committed to diversifying our economy into new sectors and strengthening our renewable energy infrastructure. However, the program as proposed does not adequately protect the Mid-Atlantic states’ interests and we hope you will heed our request to exclude areas off our coasts.

Thank you for your consideration in the matter.

Sincerely,

Elizabeth Semple
MARCO Management Board Chair