February 28, 2006

Minerals Management Service
Attn: Rules Processing Team [RPT]
381 Elden Street
MS-40-24
Herndon, Virginia 20170-4817

Re: RIN 1010-AD30, Alternate Energy-Related Uses on the Outer Continental Shelf

To Whom It May Concern:

This letter is to provide formal comments in response to the MMS December 30, 2005 Advance Notice of Proposed Rulemaking (ANPR) Federal Register Notice pursuant to RIN 1010-AD30 on Alternate Energy-Related Uses on the Outer Continental Shelf.

Our comments follow below, and track the format delineated in the Federal Register (FR) Notice, respond to the questions identified therein, and utilize the headings, responses to numbered questions, and nomenclature requested by the agency therein. On behalf of our organizations, we appreciate this opportunity to provide these comments. Our organizations support the responsible development of domestic renewable energy resources in a manner which fully protects the sensitive living resources and existing economic sectors reliant on a healthy ocean ecosystem, subject to all existing federal and state laws and to legitimate local zoning authority.

General Comments:

As a general overarching principle, although Section 388(a) of the Energy Policy Act of 2005 amended section 8 of the Outer Continental Shelf Lands Act (OCSLA) (43 U.S.C. 1337) to authorize the Department of Interior (DOI) to grant leases, easements or rights-of-way on the U.S. Outer Continental Shelf (OCS) for the development and support of energy resources from sources other than oil and gas and to allow for alternate uses of existing facilities on the OCS, and DOI has indicated in the subject FR notice an intent to subordinate this authority to MMS ((hereinafter "the agency"), it should be noted that the applicable provisions of the Energy Policy Act did not amend other sections of the OCSLA. The Energy Policy Act of 2005 amendments to section 8 of the Outer Continental Shelf Lands Act clearly did not rescind nor alter any relevant provisions of the National Environmental Policy Act (NEPA), the Endangered Species Act (ESA), the Coastal Zone Management Act (CZMA), nor the National Marine Sanctuaries Act (NMSA). It should, therefore, be noted that the regulations now being promulgated and the future activities likely to be facilitated under the cited provision of the Energy Policy Act of 2005 must still remain subject to all other provisions of the OCSLA that were not amended, and remain subject to NEPA, the ESA, the CZMA, the NMSA, and all other relevant federal and state laws and regulations.

In addition, it should be acknowledged by the agency that characterization of those portions of the proposed rulemaking that deal with existing offshore OCS oil and gas infrastructure and with various elements of conventional oil and natural gas and LNG siting, subsea methane hydrate leasing or extraction, or oil, natural gas and LNG transportation and pipeline infrastructure, cannot be accurately characterized as "alternate" energy facilities, and remain subject to a range of other pre-existing regulatory and legal governance frameworks not legitimately altered by the Energy Policy Act of 2005.

Further, we concur with the stipulation by MMS contained in the FR notice, in reference to the Energy Policy Act of 2005 (The Act) that "The Act does not supersede any existing restrictions on OCS activities, including existing deferrals by Presidential withdrawal or congressional moratoria for oil and gas production-related activities, and does not apply to areas designated as marine sanctuaries, national parks, and national wildlife refuges, and national monuments." With regard to this statement in the ANPR, we would emphasize that existing congressional OCS moratoria, as currently in effect and as also included in the White House budget document for fiscal year 2007, clearly and specifically preclude "leasing, pre-leasing, and related activities" in many of the areas being proposed for inclusion in the December 30, 2005 Advance Notice of Proposed Rulemaking (ANPR) Federal Register Notice pursuant to RIN 1010-AD30. Pre-leasing activities are thus specifically precluded by federal law under existing congressional OCS moratoria now in effect.

We must respectfully disagree with the agency's presumption, contained in the ANPR, that "MMS interprets the authority granted in section 388(a) of the Energy Policy Act of 2005 to issue leases, easements or rights-of-way as also providing MMS authority to regulate or permit the activities that occur on those leases, easements, or rights of way, if those activities are energy-related." Conversion of existing OCS jackets and platforms to "new" uses, while forgiving the present OCS oil and gas lessees from the existing contractual obligations to remove their infrastructure and restore the seabed to as near to the original condition – contractual stipulations that each lessee voluntarily incurred at the time of leasing the tract - would be inappropriate and present an option well beyond the jurisdictional scope of DOI activities authorized by the Energy Policy Act of 2005. Conversion of existing offshore oil and gas infrastructure to offshore aquaculture installations is also beyond the scope of the authorization provided by the Energy Policy Act of 2005.

In responding to the specific questions outlined in the FR notice by Program Area and question number, as requested, we offer the following comments. The agency will note that our comments, as requested, reflect the same order and the same identifying numbers as the questions on which comments are solicited in the FR notice itself:

1. Are there regulatory regimes, either in the US or abroad, that address similar or related issues that should be reviewed or considered as MMS moves forward with the rulemaking process? The model of the MMS management of conventional OCS oil and gas resource leasing and management should not be emulated in the alternate energy

field. A full literature review and programmatic assessment of all other international management regimes for offshore wind and wave and "saltwater hydro" installations should be conducted worldwide by MMS, and potential models identified and compared by the agency prior to promulgation of a management structure for alternate energy resources in US waters. Area-wide leasing or easements, area-wide NEPA processes, and any use of categorical exemptions for classes of projects should be avoided by the agency.

Program Area:
Reponses to Questions Related to Access to OCS Lands and Resources

General Issues:

A. Access for resource and site assessment: Stringent permit requirements for resource and site assessment activities must be promulgated and enforced by MMS with the goal of fully protecting sensitive marine ecosystems and fisheries in the public trust.

B. Issue the appropriate instrument: Appropriate instruments should be determined by initially experimenting with a range of different instruments, including leases, easements, and rights-of-way. Royalties on the amount of energy produced from a given installation can assure fair market value to the taxpayers who own the resource. Once the most successful instruments for application to the entirely new range of technologies reflected by alternate energy resource development becomes apparent via experimental application of various scenarios, then the most appropriate method can be selected and applied after adequate public review and comment. Cumulative impacts of multiple projects of similar types in a given region, and of different types of projects in the same region (i.e.; wind and wave for example) should be taken into full account in the selection of appropriate instruments of conveyance.

C. Solicit interest for development projects: The "Call for information and interest" procedures currently utilized by MMS for oil and gas prospects may provide a relevant model, if appropriately modified to reflect the unique and site-specific resource assessment techniques applied by alternate energy exploration. It is important that the "Alternate Energy" program not emulate any other portion of the MMS oil and gas management procedures, such as provision of incentives through royalty forgiveness or Royalties in Kind (RIK), for example. The "Call for information and interest" scenario will not be relevant for "non alternate energy" industry proposals involving LNG installations, subsea pipelines, nor conversions of existing OCS infrastructure for aquaculture or other uses. Due care to protect seabed and shoreline natural resources, living marine systems, competing uses of the sea and seabed, non-extractive user groups and stakeholders, coastal-dependent regional economic

interests, and heritage value of viewsheds and intrinsic value of coastal waters must be exercised by the agency at all regulatory and policy junctures.

D. Identify terms and conditions of use such as: Issuance – instruments should be revocable if terms and conditions to protect existing living resources and site integrity are not met by lessees. Duration – terms of duration should require due-diligence by lessees, or a performance bond, and in any event should not exceed 20 years before renewal is required, subject to adequate permit terms and conditions necessary to protect the environment. Assignment of rights – lessees on the traditional OCS oil and gas leases have often made a habit of speculating through bidding on and acquiring lease rights in locations that the original lessee never develops, but instead resells to a secondary owner, or "transferee". Such speculative practices should be strongly discouraged by the regulations being promulgated under this ANPR. Suspensions and cancellations of rights: Limitation of rights – lessees should not be allowed to continually place sites in suspension, in order to await higher energy prices before developing the resource. The process of lease suspensions has been misused by both MMS and lessees in conventional OCS oil and gas provinces, and this practice must be terminated and not reinvented in the alternate energy field. Provision for cancellation of rights should be made for non-performance of contractual agreements by lessees, for lack of due care in protecting living marine resources, and for failure to comply with applicable laws and regulations. Lessees or operators should not be held harmless nor indemnified for the full extent of damages, or any portion of damages, to living marine resources or coastal economies caused by their operations or by accidents occurring as a result of their operations.

E. Identify geographical areas of interest for: Resource and site assessment – Development feasibility - The "Seaward Boundary Lines" promulgated by the Department of Interior subject to the Federal Register, Volume 71, No. 1, dated Tuesday, January 3, 2006 and entitled "Federal Outer Continental Shelf (OCS) Administrative Boundaries Extending from the Submerged Lands Act Boundary seaward to the Limit of the United States Outer Continental Shelf" are not appropriate for application to the "alternate energy" uses being proposed for the OCS. Many coastal states have been substantially shortchanged and denied legitimate authority under this rulemaking, and it should not be applied to alternate energy uses of the OCS.

F. Ensure fair competition - Participation by small business entities should be encouraged where possible, and participation by local communities and local utility districts in generating power for local use should also be encouraged. Alternate renewable energy facilities should displace existing conventional power plants, taking over existing demand loads, and not be built to subsidize new demand created by wasteful energy consumption practices and inefficiency.

G. Process permits and applications – Full public review and compliance with project-specific NEPA processes should accompany each application and permit procedure. Cumulative impacts should be fully considered, and no programmatic or areawide Environmental Impact Statements, categorical exemptions, or Environmental Assessments should be utilized in assessing project impacts.

H. Process pre-application resource assessments – Pre-application resource assessments should be subjected by the agency to proprietary restrictions in a manner similar to that practiced for conventional OCS oil and gas resource assessments, to protect the rights of project applicants and to ensure full value compensation to the taxpayer for resources held in the public trust.

I. Allow Concurrent Developments – Concurrent developments should be avoided unless there is compelling evidence that cumulative impacts are of an appropriately low threshold of concern. Cumulative impacts may not always become apparent until after all components are constructed, raising concerns about cumulative impacts such as interference by multiple structures with prevailing ocean currents or wave regimes.

J. Minimize multi-use impacts – All due care should be taken at every step in the pre-construction planning and evaluation process to avoid multiple-use conflicts. New offshore "built infrastructure" of any kind can create conflicts with longstanding fishing practices and other current uses of the sea and seabed. Mud mounds on the seabed caused by normal subsea construction activities can linger for decades and present gear hazards to certain types of fisheries.

Responses to Specific Questions:

2. Possible development scenarios – Phased development scenarios, such as phased access rights, would enable the agency to pre-assess the probable cumulative impacts of future phases of a project by monitoring an initial testbed facility as a proof-of-concept example. Additional phases, or elements, could then be approved subject to the learning curve provided by the initial phases of each project element.

3. Competing public uses, including activities that preclude future public uses – MMS should consider all types economic and non-economic benefits to society as a whole of both the existing undeveloped sea and seabed and adjacent coastline, balanced against the proposed displacement of existing public uses by the new industrial infrastructure. Where public uses will be lost, essentially permanently, some fiscal or equivalent offset to the public benefit should be required by the agency as a precursor to development. Any proposed mitigation measures must be proven in the real world before being accepted as meaningful and adequate.

4. A geographical area of interest may consist, depending on local and regional situations, of a large or a small area. A limited geographical area of interest may be a small

embayment, subject to tight space-use constraints, or a broader geographical area of interest may be defined by a wind resource assessment based on coastal topography or prevailing onshore wind regimes. The "Seaward Boundary Lines" promulgated by the Department of Interior subject to the Federal Register, Volume 71, No. 1, dated Tuesday, January 3, 2006 and entitled "Federal Outer Continental Shelf (OCS) Administrative Boundaries Extending from the Submerged Lands Act Boundary seaward to the Limit of the United States Outer Continental Shelf" should not be applied to determine or define geographic areas of interest for alternate energy uses of the OCS.

5. Assessments prior to competition should be conducted to determine engineering limitations of the type of technology being proposed, its record in other regions with respect to avian and wildlife conflicts, towers, and blade or turbine failure rate in extreme weather conditions. A large number of offshore oil and gas installations in the Gulf of Mexico were damaged by Hurricanes Katrina and Rita due to what the petroleum industry itself refers to as "under-engineering" of their infrastructure. Public trust resources should not be used as an experimental testing location for unproven technologies that present hazards to the environment.

6. MMS should, at the outset, experiment to determine whether auction of access rights or direct negotiation with prospective developers will best protect the public trust resource and ensure fair market value to the taxpayer, then adopt the most successful regime as demonstrated by comparative analysis of the two approaches.

7. Program development should be targeted to specific regions, based on relative sensitivity of the local living marine resources balanced against potential for renewable energy production.

8. MMS should conduct an economic impact analysis which considers all existing uses of the sea and seabed as a part of identifying areas for access. This economic analysis should be completed prior to project approval or granting of any lease or easement.

9. Existing uses of the sea and seabed are generally renewable in nature and provide recurring economic benefits to the public, some of which are difficult to quantify. Recent progress in economic quantification of intrinsic values has been made, and should be incorporated in pending decisions by MMS about which areas to open to what industrial activities. Public safety should be taken into account in this process.

10. Permits should be required when prospectors are gathering data from vessels, and data should be considered proprietary.

11. MMS should consider fisheries, non-consumptive uses, and intrinsic public values in evaluating the competing uses for a given area and in deciding whether or not to approve a particular project. Energy facilities should not be given priority over other uses of the site, but rather weighed and balanced against existing and future productive uses of other kinds. Competing projects for the same site (i.e.; wind vs. wave) should be evaluated in

terms of which technology will have the least environmental impact and which technology will produce the largest amount of reliable renewable energy resource.

Program Area:
Reponses to Questions Related to Environmental Information, Management, and Compliance

Proposed mitigation measures must be proven effective and not hypothetical. Avoidance-of-conflict agreements with existing beneficiaries of an offshore area must be enforceable and proven to incorporate effective measures. Area-wide leasing or easements, area-wide NEPA processes, and any use of categorical exemptions for classes of projects should be avoided by the agency. Monitoring programs must be funded in advance by endowments by the project owner, and no exemption from required abandonment procedures and restoration of the sea and seabed to as near original conditions as feasible should be granted at the end of the project's useful life. Adaptive management systems, as proposed in the ANPR, should require compliance with all pertinent laws and regulations, including Coastal Zone Management and local zoning ordinances affecting shoreline components of each project.

K. Information requirements needed for environmental management systems for any project: A baseline framework of required information that must be submitted by the prospective developer prior to consideration of the application should be developed in advance by the agency and each applicant strictly held to the terms and conditions of this framework.

L. A risk-assessment scenario for offshore alternate energy projects should be developed in advance by the agency for each category of project. Risk-assessment for LNG-related facilities, for example, will be much different from risk-assessment for offshore aquaculture facilities to be built on disused offshore oil platforms. Each category of project, even alternate energy projects, does present its own range of risks, and different types of risks occur during construction, during maintenance, and during normal operations. Each should be analyzed and evaluated in advance of project approval.

M. Best available and safest practices have been developed and implemented throughout the world for offshore alternate energy facilities, and if a technology is available anywhere in the world that is safer, it should be required pro forma in US waters. This would include mitigation factors such as appropriate wind turbine tip-speed ratios conducive to avoidance of bird collisions, for example.

N. Balancing environmental considerations with national energy needs - The fact that a truly renewable "alternate energy" facility may displace some of the oil spill risks posed by tanker importation of oil, or from offshore oil and gas development, and may eliminate a portion of the carbon loading or mercury or NOx emissions to the atmosphere contributed by conventional power generating facilities, should not supercede the need to protect existing environmental assets from potential adverse

impacts associated with alternate energy infrastructure. The "critical balancing" envisioned by the drafters of the underlying OCS Lands Act should be applied in an evenhanded and responsible manner by the agency, and this should be carried out on a site-specific basis for each proposed facility.

12. What types and levels of environmental consideration should MMS require for a project? A full site-specific Environmental Impact Statement prepared pursuant to NEPA should be prepared for each project and subjected to full public review. State authority under the CZMA should be respected. Local zoning ordinances should be respected where project elements are to be located on nearby shorelines.

13. Site specific studies, including ocean current patterns, wave-train regimes, the role of wave action in beach sand transport and littoral drift, and relevant windspeed and prevailing wind directional information should be part of any of these analyses, and each should be provided by the project sponsor in advance of consideration of the project by MMS. Environmental Assessments should not be considered in place of a full EIS process, and categorical exemptions for classes of "similar" projects should not be granted.

14. The goals of monitoring, mitigation, and enforcement should be to ensure that the pre-existing public trust values of each project site are protected during the lifetime of the installation, and that abandonment and a comprehensive site restoration proceeds in a timely fashion according to parameters established as a part of the contractual agreement entered into by the lease or easement holder at the outset of the project.

15. Types of impacts of concern from the full range of prospective types of projects under consideration in this program include, but are not limited to: seabird and migratory bird mortality resulting from collisions with rotating wind turbine blades and tower components, marine life entrainment in seawater intakes for LNG installations, fishery damage from subsea "saltwater hydro" turbine blades, altered localized ocean current regimes resulting from dense concentrations of seabed support pylons within limited embayments, viewshed visual impacts, use of constructed infrastructure by increased concentrations of birds of prey, alteration of wave regimes resulting from energy extraction from installation of surface buoys or floating "ducks" over relatively large marine areas, displacement of historic fishing grounds, hazards to navigation, oil spill risks during construction and maintenance procedures, escapement of non-native or genetically-engineered aquaculture species causing contamination of native fish stocks, introduction of sea lice and other parasites from aquaculture operations to native fish stocks, and contributions of damaging nutrient loading into nearshore waters from aquaculture operation discharges.

16. Regulatory program elements that can lead to effective enforcement of environmental requirements will include requirements for a full site-specific EIS for each project, no allowance for categorical exemptions for a similar class of projects, no use of Environmental Assessments, no area-wide leasing or easements, qualified and experienced firms preparing environmental documents, mitigation measures tested and

proven effective by National Laboratories and independent analysis, and cumulative impact analysis for each region.

17. Environmental management systems should be monitored by MMS, with no self-monitoring permitted. The oversight and governance responsibility should rest solely with the federal government.

Program Area:
Reponses to Questions Related to Operational Activities

O. Permitting of pilot projects should be conducted according to the precautionary principle. New and unproven technologies should only be permitted on a contingent basis, with careful and independent monitoring conducted during early phases of operations, before additional permits are granted.

P. Ensuring human health and safety on and adjacent to the project site will differ between, for example, renewable energy projects and LNG-related projects which have a very large potential for widespread damage in the event of a catastrophic breach of containment leading to an LNG "pool fire". All applicable precautionary measures to protect safety and health of workers and the general public should be applied, with agency monitoring for compliance with OSHA and other relevant health and public and employee safety laws.

Q. Protection of environmental resources during construction will entail monitoring of siltation and other pollution sources during piling installation, avoidance of undue damage to benthic resources on live-bottom sites, zero-discharge of fluids and oils, care in selecting appropriate sites for any necessary "jetted in" cable landfalls, and mitigation of seismic impacts if pile-drivers or site-specific airgun exploration for engineering purposes is required. Protection of environmental resources during operations will entail compliance with lease or easement stipulations provided by the agency, onsite inspections and monitoring by MMS, and posting of a performance bond by the operator. No onsite offshore storage of any significant quantity of lubricating oil or other toxics should be permitted. Protection of environmental resources during facility removal will include precluding use of explosives, prevention of in situ abandonment or "windmills to reefs" schemes, and agency inspection for post-abandonment compliance with restoration of the site and surrounding area.

R. Modification of existing installations will require full engineering analysis to ensure that modifications meet worst-case wind and wave impacts on the structural integrity of the facility.

S. Production requirements as a condition of diligence should include a reliability factor that justifies the balancing decision made by the agency – finding a true balance between energy generation and protection of existing public trust

resources. Chronically inoperative or out-of-service turbines should not be allowed to result from this program.

T. End of life and facility removal should be clearly established by contractual agreement with the lessee or easement holder prior to construction of any project. After the fact schemes such as rigs-to-reefs as an excuse for in situ abandonment should be precluded before a permit is issued by the agency.

U. All oversight responsibilities (e.g., inspection, monitoring, enforcement) must be the sole responsibility of the federal government. No self-monitoring should be permitted to occur.

V. Identification of technology assessment and research needs should be facilitated via the provision of adequate funding for federal laboratories.

W. Preventing waste should be accomplished through the use of energy transmission components which are state-of-the-art as to energy efficiency, materials science, and low transmission losses.

X. Conservation of resources should be accomplished by applying a reasonable standard of recycling and reuse of refurbished components wherever applicable.

18. Facility removal should be established prior to permitting of the initial phase of the project, and project owners required to post a performance bond certifying that removal of all components will be completed at the end of the project life. The site should not be permitted to become a subsea junkyard.

19. Engineering challenges such as corrosive atmospheres, saltwater, cavitation of wind and wave turbines, and seafloor erosion caused by wave scour surrounding support pilings and caissons should be considered by the agency. Adequate safety markings, electronic devices and radars, and lighting to mitigate potential navigational hazards should be required by the agency.

20. Safety issues on the OCS include navigational conflicts, oil spill risks, worker safety, component failure due to materials fatigue, and electrical hazards from components and transmission cables.

21. Operational activities should be monitored with regular, scheduled, periodic inspections by the agency, supplemented by periodic unscheduled inspections.

22. Each inspection protocol should be tailored by the agency to fit the parameters of the particular type of facility being considered.

Program Area:
Reponses to Questions Related to Payments and Revenues

23. Cost recovery for monitoring and processing of permits should be part of any payments and revenues scheme. Reasonable rents and royalties should be established as experience with the new types of technologies is gained by the agency. Fair market value for use of the public trust resource, including surface occupancy of the sea and seabed, should be achieved by the agency.

24. Some fiscal encouragements, carefully designed to phase out as the technology gains fiscal viability through the economics of mass production, may be justified initially by the fledgling nature of renewal energy installations. But the agency is still responsible for ensuring full fair market value to the public trust throughout each project's useful life.

25. Wind energy site assessments are likely more accurate, and based on a wider industry base of experience, than, for example, ocean current or wave energy site assessments.

26. Profitability of alternate (renewable) energy installations should be competitive with non-renewable energy resources such as conventional oil and gas resources as market prices for non-renewable resources continue to increase.

27. No comment on this issue at this time.

28. Reduced carbon loading to the atmosphere, reduced risk of marine oil spills, lack of radioactive plumes, and increased energy security due to decentralized facilities are among the potential public benefits of renewable energy installations if, and only if, such facilities are properly permitted and carefully managed to protect living resources.

29. No indemnification from liability for damage to public trust resources should be granted to lesees or easement holders. A surety bond should equal the anticipated maximum liability that could be incurred by the operator if a "worst case" accident occurred. Exxon-Mobil continues to appeal their damage award for the 1989 Exxon Valdez tanker spill, providing ample and compelling evidence that industrial operators often will not willingly accept liability for their own negligence.

Program Area:
Reponses to Questions Related to Coordination and Consultation

30. Additional steps for coordination and consultation by MMS should include invitations by the agency to Coastal Zone Management agencies and state governors and resource agencies to participate in each step of the rulemaking. Public meetings should be held in local areas on planned program elements in that region.

31. A focus on specific regions would enable MMS to develop more localized permitting, monitoring, and management scenarios that respect existing local coastal economic

interests, existing uses of the sea and seabed, and accommodate state priorities of the nearby coastal states.

32. Comments should be solicited on which areas of the OCS should be included or excluded from the program. Once an area is deemed too sensitive for inclusion, it should be permanently excluded. Carefully crafted national standards for ocean zoning should be adopted with full participation by all affected stakeholders and coastal states, and, once established, respected by the agency in all future planning decisions.

33. Consultation with affected parties, including local governments and coastal states, should begin with the initial rulemaking, and continue throughout the application processing, permit process, NEPA review, and monitoring and abandonment proceedings.

34. Processes for consultation should be codified in the regulations, and the regulations themselves developed via consultation with all interested parties.

35. Time and burden on the project and on the agency need not present undue constraints, if the initial process is carefully designed by the agency.

36. No comment on this item at this time.

On behalf of our organizations, we appreciate this opportunity to provide these comments on the ANPR.

Sincerely,

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