

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80001
Date: Tuesday, March 20, 2007 5:05:44 AM

Thank you for your comment, Thom Nelson.

The comment tracking number that has been assigned to your comment is 80001. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: March 20, 2007 04:05:43AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80001

First Name: Thom
 Last Name: Nelson
 Organization: The NelSun Company
 Address: 558 NE 3rd street suite B
 City: Newport
 State: OR
 Zip: 97365
 Country: USA
 Email: tnelsonseafoods@hotmail.com
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

I'm an inventor who just completed getting the first hydrofoil-buoy on the market. I'm very interested in the production of energy via currents and swells. However I dont plan to concentrate solely on the OCS, to whom would I contact about placing a prototype within a mile from shore?

80001-001

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80003
Date: Monday, March 26, 2007 4:15:38 PM

Thank you for your comment, Faye Haring.

The comment tracking number that has been assigned to your comment is 80003. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: March 26, 2007 03:15:51PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80003

First Name: Faye
 Middle Initial: G
 Last Name: Haring
 Address:
 City:
 State: NJ
 Zip:
 Country: USA
 Email: fayeharing@yahoo.com
 Privacy Preference: Withhold address only from public record

Comment Submitted:

I am retired and now live at the Jersey shore. If there is one thing we have here, it is wind. I have read all the articles both for and against the offshore wind turbines. I wish to state my opinion that wind turbines should be allowed. We need to find alternatives both to fossil fuels and to the dependence on mideastern oil countries. It is true that New Jersey is on the migratory flight route of many bird species but how many of them are far out to sea? As to the impact on commercial fishing, if you can't see a wind turbine ahead of you, you shouldn't be piloting a boat. It will not have an adverse effect on tourism. Atlantic City has a wind turbine farm and it has become a tourist attraction. We need to enter the 21st century and look forward and not continue with a depleting energy supply. What energy sources we have are going to end before we know it and we need to be willing to make changes. Thank you.

80003-001

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80004
Date: Monday, March 26, 2007 5:32:57 PM

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is 80004. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: March 26, 2007 04:33:07PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
 Draft Comment: 80004

First Name:
 Last Name:
 Address:
 City:
 State: AZ
 Zip:
 Country: USA
 Email:
 Privacy Preference: Withhold name and address from public record

Comment Submitted:

I understand that three alternatives were considered in the draft Programmatic EIS: (1) development of a program and issuance of regulations governing activities related to production of alternative energy on the OCS, etc.; (2) a case-by-case alternative (without a program); and (3) a no action alternative. The initial results of the report propose implementation of the first alternative: developing regulations to promote consistency, reduce confusion, improve efficiency, etc.

I would suggest, in addition to an over-arching regulatory program, that a case-by-case component be incorporated into decisions regarding the grant of leases, easements, etc. Each project will be unique in terms of location, local ecosystem and environment, and potential impacts. A semi-custom (hybrid) approach may offer the best process for guaranteeing that potential impacts unforeseen by the broad regulatory scheme may be addressed on a case-by-case basis at the project level, after information and potential impacts unique to a specific project can be gathered. I would also suggest that inquiries into

80004-001

80004-002

potential impacts be "open-ended" rather than limited to those that are initially foreseen. Since alternative energy projects are relatively new, unfamiliar, and are still under development, the impacts are not well known. Any regulatory scheme should be flexible enough to incorporate the new data and knowledge garnered from initial projects.

Finally, given the large scale of many such projects, and the potentially risky nature of success for such unproven ventures, it would be wise to require proof (through surety) of financial sufficiency to decommission failed projects. Bankrupt ventures don't clean up their messes.

80004-002
(cont.)

80004-003

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80005
Date: Monday, March 26, 2007 8:02:58 PM

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is 80005. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: March 26, 2007 07:03:08PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80005

First Name:
Middle Initial:
Last Name:
Address:
City:
State: NJ
Zip:
Country: USA
Email:
Privacy Preference: Withhold name and address from public record

Comment Submitted:

Please, Stop the madness. The proposed installation of wind turbines off our shoreline, is just that. Thanks to over-development, the natural habitat of the native wildlife is rapidly disappearing. Now, we are to allow the same to happen to our ocean? The state of New Jersey is a major corridor for migrating birds. As a concerned citizen and human being, I am opposed to any destruction of wildlife, or marine life. I am troubled that the issue of this offshore wind turbine system to our shoreline and its inhabitants is even still in debate, after the long list of environmental impacts. Exactly, how many marine mammals dying in the moorings equate to minor impact? How many birds migrating into the blades of metal turbines equate to moderate impact? I hope your answer will be: Even (1) is too many, We won't allow it. No to Wind Turbines!

80005-001

Questions about submitting comments over the Web? Contact us at:

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80006
Date: Tuesday, March 27, 2007 8:11:45 AM

Thank you for your comment, Robyn Paugh.

The comment tracking number that has been assigned to your comment is 80006. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: March 27, 2007 07:11:52AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80006

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Last Name: Paugh
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Comment Submitted:

This country needs to support offshore wind energy efforts. It is one of the few renewable sources of energy that can be used to alleviate stress on the power grid without using anything non-renewable. In addition, it is one of the few sources of energy that doesn't create some side issue of other pollution, or use of other non-renewable sources to provide its own energy (e.g., gas turbine generators or cleaner coal-based fuel). It is irresponsible to continue to use non-renewable resources to provide power when the technology is available for us to use completely renewable sources such as wind and solar.

80006-001

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80011
Date: Wednesday, March 28, 2007 4:44:36 PM

Thank you for your comment, Jean Heidorn.

The comment tracking number that has been assigned to your comment is 80011. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: March 28, 2007 03:44:44PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
 Draft Comment: 80011

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 Last Name: Heidorn
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 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

I strongly suggest that we move forward quickly with the development of wind turbines in NJ. Many countries overseas are having great success with them. I have personally been underneath one in Somerset, PA and they are not loud by any means. I think they are quite beautiful. Please, let's get moving on this very necessary alternative energy source!!!

80011-001

80011-002

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80012
Date: Wednesday, April 04, 2007 7:26:06 PM

Thank you for your comment, John Barker.

The comment tracking number that has been assigned to your comment is 80012. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: April 4, 2007 07:26:21PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
 Draft Comment: 80012

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 Address 3: 1674 N Bissell St.
 City: Chicago
 State: IL
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 Country: USA
 Email: johndavidbarker@hotmail.com
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

The development of offshore wind farms are very important and necessary in order to provide the United States with energy that will reduce pollution, provide for energy independence, and create jobs. It will be in the interest of the United States to expeditiously develop a program and issuance of regulations governing activities relating to offshore renewable energy development on the OCS. (Comment directed to MMS from www.radialwind.org)

80012-001

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives](#);
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80013
Date: Monday, April 16, 2007 6:43:49 PM
Attachments: MMS_EIS_comments_final_80013.doc

EcoRigs.org
Non-Profit Organization
6765 Corporate Blvd. Suite 1207
Baton Rouge, Louisiana 70809

Thank you for your comment, Steve Kolian.

The comment tracking number that has been assigned to your comment is 80013. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: April 16, 2007 06:44:17PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80013

First Name: Steve
Last Name: Kolian
Organization: EcoRigs
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City: Baton Rouge
State: LA
Zip: 70809
Country: USA
Email: stevekolian@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Aquaculture Act\MMS_EIS_comments_final.doc

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

To: US Department of the Interior
Minerals Management Service
Attn: Rules Processing Team (RPT)
381 Elden St., MS-4024
Herndon, VA 20170-4817

From: Steve Kolian
Director

Re: COMMENTS ON PEIS AEAU PROGRAM

Date: April 16, 2007

I am pleased to offer comments on the Programmatic Environmental Impact Statement (PEIS) for the Alternative Energy Alternative Use (AEAU) program. I found the document to be comprehensive and well prepared.

The future success of utilizing retired offshore platforms for alternative energy sources and mariculture will be dependent on a stable legal framework to transfer the platform liability from oil and gas operator to the alternative energy or mariculture user. In addition, the cost of permitting, monitoring, reporting, and platform removal responsibilities will have to be economical if the new industry is to succeed.

Comments have been submitted in response to a few items in Chapter 6. Please review comments below.

6.3.2: Par.1, s.3

Potential drawbacks [of aquaculture] could include“negative socioeconomic impacts on fishing communities”.

Comment:

In Louisiana and Texas, market competition between commercial fishermen and aquaculture would be extremely low. The majority of species identified for culture on platforms such as coral, sponge, mollusks, ornamental fish, and algae are not harvested by commercial fisherman in Louisiana and Texas. Those finfish that are suitable for both raising in net-pens and harvest by commercial fishermen, represent 2% of the annual commercial harvest in Texas and Louisiana.

Investigations into candidate culture species in net-pen operations has led to consideration of a short list of 8 species, including but not limited to: red snapper, grouper(s), cobia, red porgy, red drum, pompano, greater amberjack, and mutton snapper. These species represent \$5,177,825 and 2% of the total value of the annual fish landings in Louisiana. The shrimp, crab, oyster and menhaden fisheries produce \$251,094,161/yr and 90% of the total value of landings. All marine finfish landings in Louisiana combined constitute 7% of value of the total landings (NOAA Fisheries 2007).

In Texas, the shrimp, crab, and oyster fisheries produce \$ 161,436,618/yr and 92% of the total value of landings on the docks of fish packers in Texas. The list of 8 species, including but not limited to: red snapper, grouper(s), cobia, red porgy, red drum, pompano, greater amberjack, and mutton snapper represent \$4,507,613 and 2% of the total value of the annual fish landings in Texas. All marine finfish in Texas combined constitute 7% of value of the total landings (NOAA Fisheries 2007).¹

Aquaculture ventures will employ commercial fishermen to operate and manage aquaculture operations. Aquaculture will promote the cultivation of new species. The proposed activities are more likely to result in a positive socio-economic impact on coastal fishing communities rather than negative impacts.

6.3.1.2 par.3, s.3

Even with the selection of native species, there are concerns with the escape of cultured organisms into open waters and their interaction with wildlife. Escapees may compete for food and habitat, reproduce and cause a change in population outside natural distribution range, cause a shift in the wild gene pool, or spread disease.

Comment:

Please provide references of publications that document the escapement of cultured native species from aquaculture facilities have had a negative affect on local wild populations. Please provide references that show escaped fish have competed for food and habitat, reproduced and caused a change in population outside natural distribution range, caused a shift in the wild gene pool, or spread disease to wild populations of fish.

¹ Data was gathered from NOAA Fisheries Economic Division online results from annual fisheries landings in Texas and Louisiana. Medians were calculated for years 2000-2005. See <http://www.st.nmfs.gov/st1/>

80013-001

80013-002

Please note that there has been a case where Atlantic salmon cultured in the Pacific transmitted sea lice to the wild Pacific salmon population. Atlantic salmon are not native to the Pacific Ocean. Also, NRC 2002 found that escaped farm raised salmon raised in Maine did not alter the gene pool of the local indigenous species.

6.3.2.2, par. 6, s.1

Siting of an aquaculture facility should avoid areas essential to the commercial fishing industry so as not to reduce natural fisheries production.

Comment:

Investigations into mariculture have identified offshore locations in waters greater than 20 m are suitable for the aquaculture. In Louisiana, the majority of Louisiana commercial fishermen are inshore fishermen. Approximately 1,000 commercial vessels are licensed to fish in federal waters and 2,300 commercial vessels licensed exclusively for state waters. The majority of vessels permitted for federal waters are in the pursuit of white shrimp, crab, menhaden, and oysters and trawling in depths less than 20 m.

It should be noted that commercial and recreational fishermen may want to encourage inshore aquaculture and alternate uses. These groups may find that aquaculture and alternative uses of OCS facilities are beneficial to their harvest and may want them closer to shore near their traditional fishing grounds.

80013-002
(cont.)

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80014
Date: Wednesday, April 25, 2007 12:05:42 PM
Attachments: SuffolkLifeMMSLIOW_80014.doc

Thank you for your comment, Charles Hersh.

The comment tracking number that has been assigned to your comment is 80014. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: April 25, 2007 12:06:21PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80014

First Name: Charles
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Last Name: Hersh
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State: NY
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Country: USA
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Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\Owner\My Documents\Chuck'sIdeas
\LIPA\WindEnergy\SuffolkLifeMMSLIOW.doc

Questions about submitting comments over the Web? Contact us at:
ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate
Use Programmatic EIS Webmaster at (630)252-6182.

Charles A. Hersh
291 Sioux Ave.
Amityville, NY 11701-2233
Phone (631) 789-3611
E-Mail chuck101@optonline.net

Mr. David J. Wilmott, Sr., Editor and Publisher
Suffolk Life
P.O. Box 9167
Riverhead, NY 11901-9167

Dear Mr. Wilmott

Please reconsider this article, "Letters to the Editor" for consideration and publishing.

Regards

Charles A. Hersh, Retired Electrical Engineer
E-mail chuck101@optonline.net
4/16/06

Should the Long Island Offshore Wind Project, LIOWP be "Unplugged"?

The LIOWP should not be built. It will be an eyesore that will last at least 40 years with 40 wind turbines each over 400 feet high that will be seen from both Jones Beach and Fire Island. The average power will be a paltry 35 Megawatts which will fluxuate radically with the wind so you will have token amounts of power being produced sporadically. Furthermore, it can't be adjusted for varying power needs.

This project will only delay Repowering efforts by LIPA and Keyspan by diverting needed funds and effort away. The LIOWP will cost at least \$600 million which is the same amount of money repowering half of the Northport power plant will cost. Repowering Keyspan's generating equipment is far more important and beneficial to the environment than the LIOWP. It is also far more suitable for meeting LI's needs. Repowering Northport, Port Jefferson, and Barret Island will nearly double the efficiency, while providing an additional 4 million kilowatts of additional power. This can drastically cut both fuel and CO2 emissions while easily meeting our growing need for clean electric power. This is the thing to do.

The LIOWP is merely filling a need by some environmentalists for renewable energy. Unfortunately they should have been asking "How best to reduce fossil fuel use as well as CO2 emissions?" instead of "How can I include renewable energy regardless of how much it costs or how well it works?" As a power source, it is very poor since it's undependable and changes drastically with wind speed. This prevents "wind energy" from ever being able to replace more than 20% of fossil fuel use. It's just not worth doing.

Steve Bellone, Babylon Township supervisor prefers repowering over the LIOWP saying "It's a no-brainer". However, if both are done, then part of the additional 4 million kilowatts from repowering can be used to power up the LIOWP as giant electric fans to cool off the fishermen. In short it's a "Piece of Junk".

Charles A. Hersh, Retired Electrical Engineer
E-mail chuck101@optonline.net

80014-001

80014-002

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80015
Date: Wednesday, April 25, 2007 3:43:36 PM

Thank you for your comment, Ethan Hoag.

The comment tracking number that has been assigned to your comment is 80015. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: April 25, 2007 03:44:19PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80015

First Name: Ethan
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Comment Submitted:
This initiative has been studied for years.
It is time to build it now.

80015-001

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80016
Date: Thursday, April 26, 2007 7:15:22 AM

Thank you for your comment, Paul Graham.

The comment tracking number that has been assigned to your comment is 80016. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: April 26, 2007 07:16:11AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80016

First Name: Paul
Last Name: Graham
Address: P.O. Box 3566
City: Waquoit
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Zip: 02536-3566
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Comment Submitted:
Build it.
Lease the area.
Sell stock in the company.
Just don't turn around and sell it to Haliburton or Foreigners who already sell us oil.
Don't make that entire section of the sea off limits to fishing.

80016-001

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80017
Date: Thursday, April 26, 2007 11:41:14 AM
Attachments: [Comments_on_MMS_AEP_EIS_80017.doc](#)

Thank you for your comment, Nicholas Rigas.

The comment tracking number that has been assigned to your comment is 80017. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: April 26, 2007 11:42:03AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80017

First Name: Nicholas
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Last Name: Rigas
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City: Clemson
State: SC
Zip: 29671
Country: USA
Email: nrigas@clemson.edu
Privacy Preference: Don't withhold name or address from public record
Attachment: D:\profile.cu\My Documents\Comments on MMS AEP EIS.doc

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

Comments on Alternative Energy Programmatic EIS

I would like to make several comments and suggestions related to the AEP EIS being developed by the US Department of Interior, Minerals Management Service. The work underway by the MMS is important to South Carolina as we begin to look at the potential of developing our offshore wind resources. South Carolina does not possess any fossil fuel reserves and therefore imports all its primary energy resources sending over \$8Bn out of the state every year. Our coastal communities are continuing to see rapid growth and the demand for energy increasing. The excellent offshore wind power resources of the state which lie in shallow waters provide one of the few indigenous clean primary energy resources that can be developed.

1. I believe Option 1 which puts regulations in place for granting leases, easements or rights-of-way for any alternative energy activities in the OCS is the best option for the MMS to pursue. By standardizing the process it allows developers and investors to know ahead of time what the requirement will be as well as help expedite the process. I do not believe that the case-by-case alternative and the no-action alternative are viable. The rapidly developing offshore wind power, wave and tidal energy industries in Europe are supported by favorable legislation that emphasizes environmental stewardship while at the same time not bogging down these projects in government bureaucracy. To expedite the development of these technologies here in the United States, we should look at the European experience for lessons learned and best practices.
2. Generating energy from the ocean's winds or currents does not constitute an extraction of mineral wealth as does oil and natural gas. As such, this emerging new technology should not be burdened by high lease fees or any type of mineral royalties. These regulations should only provide guidelines that ensure due diligence in the area of environmental stewardship. Burdening these emerging new technologies with additional costs will only stymie their development and result in slow commercial adoption. As a result, diversifying our nation's energy resources and promoting clean energy resources will proceed much slower.
3. The report references that most demonstration and feasibility projects have already been done in Europe and developers would skip small scale projects and go directly to large commercial projects. Although this is correct from a technology point of view, it is not correct when you consider experience and public acceptance. The experience base with offshore wind power in the United States is limited as is public acceptance. Small scale projects less than 50 MW are going to be needed to allow local companies, utilities and communities to work through all the issues associated with integrating offshore wind power into the regional infrastructure. These small scale projects were very important in Europe

80017-001

80017-002

80017-003

an allowed fabrication, installation, interconnection and public education and acceptance experience to be gained. The MMS should consider exempting or a fast track EIS for small scale projects below a pre-defined capacity.

4. Offshore wind power will serve as a local source of energy and not be a distributed nation wide as is oil and natural gas. The impact of these facilities and public acceptance will be confined to the local communities. The MMS should consider turning over the promulgation of the regulations for offshore wind power facilities to the states. Another option the MMS should consider is to give the states jurisdiction out to 20 nautical miles for offshore wind power facilities. This would allow the states to rapidly push forward and have buy-in on projects that would serve their coastal communities but also allows these facilities to be built at a distance that minimizes the public's view shed issue.

The emergence of offshore wind power is important to coastal states like South Carolina who have no indigenous fossil fuel reserves to develop. Offshore wind power can help the local communities diversify their energy resources, utilize a clean energy resource and provide a new industry for economic development as in Europe. We should not burden this new technology with undue regulations, fees or bureaucracy. We should ensure it is developed in a viable and sustainable manner with environmental due diligence, consideration to other industries that use the oceans and the local communities. I strongly urge the MMS to seriously consider working with the state governments to make this a local issue. Offshore wind power is a local source of energy that will most likely only impact the local communities and local energy supply infrastructure. This would help expedite the development and acceptance of this technology.

Regards,
Dr. Nicholas C. Rigas
Director
South Carolina Institute for Energy Studies
Clemson University

80017-003
(cont.)

80017-004

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80018
Date: Thursday, April 26, 2007 5:51:10 PM

Thank you for your comment, Carl Cassarino.

The comment tracking number that has been assigned to your comment is 80018. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: April 26, 2007 05:51:49PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80018

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 Last Name: Cassarino
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Comment Submitted:

Re: Wind generated power:

Please consider the development of wind powered generators that could be fitted atop existing power transmission line poles and/towers.
 The power generated would be fed directly into the existing distribution lines. Perhaps a wind powered generator could be designed to have the blades housed within a cone like housing similar to the fans in a jet engine. If the generators could be made small enough they could be placed intermittently all along the distribution lines. Thanks for allowing me to make these comments.
 Carl Cassarino

80018-001

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80019
Date: Friday, April 27, 2007 8:16:11 AM

Thank you for your comment, Eileen Hughes.

The comment tracking number that has been assigned to your comment is 80019. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: April 27, 2007 08:16:49AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80019

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 Country: USA
 Email: Irishhomestead1@aol.com
 Privacy Preference: Withhold address only from public record

Comment Submitted:

I am appalled at the lack of thoroughness as to questioning problems Holland is now having with wind turbines. Also, this will not alleviate our energy problems to any worthwhile degree. We have had this problem for many years, but is still not being addressed as supposedly Nantucket Sound is the only chosen viable lase. That is, according to the money making Cape Wind Eeneegy's benefit and detrimental to the quality of life on Cape Cod. Mr. Bowles, who was handpicked by Governor Patrick Deval to grant for the benefit of one company, and only one site. Why? Let us not forget the amount of oil which will be needed in the pipelines. This project solves nothing. If this move goes forward, who will take the blame when something major happens in the near future? Where is the concrete evidence showing such a necessity and no other choice alternatives? Why must we destroy in order to protect one company?

80019-001

From: ocseenergywebmaster@anl.gov
To: [ocseenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80020
Date: Wednesday, May 02, 2007 9:58:15 AM

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is 80020. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 2, 2007 09:59:08AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80020

First Name:
Middle Initial:
Last Name:
Address:
City:
State: SC
Zip:
Country: USA
Email:
Privacy Preference: Withhold name and address from public record

Comment Submitted:

Using the action of ocean waves for our energy seems a no brainer, go for it!

| 80020-001

Questions about submitting comments over the Web? Contact us at: ocseenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocseenergywebmaster@anl.gov
To: [ocseenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80021
Date: Wednesday, May 02, 2007 12:09:12 PM

Thank you for your comment, Marianne burgeson.

The comment tracking number that has been assigned to your comment is 80021. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 2, 2007 12:10:08PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80021

First Name: Marianne
Last Name: burgeson
Address:
City:
State: SC
Zip:
Country: USA
Email: lex@hargray.com
Privacy Preference: Withhold address only from public record

Comment Submitted:

Yes, I want you to explore and use any method of obtaining power that does not harm our environment or contribute to global warming. Using the wind or tides make such sense here on the coast. Thanks for asking my opinion.

| 80021-001

Questions about submitting comments over the Web? Contact us at: ocseenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80022
Date: Wednesday, May 02, 2007 5:26:46 PM

Thank you for your comment, David Crespan.

The comment tracking number that has been assigned to your comment is 80022. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 2, 2007 05:27:38PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80022

First Name: David
 Last Name: Crespan
 Address: 5 Isabella Ct
 City: Hilton Head Island
 State: SC
 Zip: 29926
 Country: USA
 Email: crespan@hargray.com
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

We have not done anything to become engery independent since the problem was first identified in the early 70's. I think we should go full bore with wind and tide engery. We live on Hilton Head and would welcome windmills 3 miles off the shoreline.

80022-001

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80024
Date: Thursday, May 03, 2007 6:19:04 AM

Thank you for your comment, Susan Andre.

The comment tracking number that has been assigned to your comment is 80024. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 3, 2007 06:19:58AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80024

First Name: Susan
 Last Name: Andre
 Address:
 City:
 State: SC
 Zip:
 Country: USA
 Email: aredtailhawk@hargray.com
 Privacy Preference: Withhold address only from public record

Comment Submitted:

The USA must intently pursue alternative energies by utilizing and/or improving on the best technologies already developed by other countries and by developing new technologies for ourselves and the world. We should also be on the forefront of developing and implementing only those technologies that have minimal or no deleterious effects on the environment. We don't want to solve a problem with shortsight; we need to consider the long range impacts on the environment. I also think this shouldn't be an opportunity for a few individuals or companies to amass great wealth... but should empower all of our citizens.

80024-001

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocseenergywebmaster@anl.gov
To: ocseenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80025
Date: Thursday, May 03, 2007 10:22:29 AM

Thank you for your comment, Elizabeth Shirk.

The comment tracking number that has been assigned to your comment is 80025. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 3, 2007 10:23:12AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80025

First Name: Elizabeth
 Middle Initial: C
 Last Name: Shirk
 Organization: Historic Preservation Division
 Address: 34 Peachtree St, NW
 Address 2: Suite 1600
 City: Atlanta
 State: GA
 Zip: 30303
 Country: USA
 Email: elizabeth_shirk@dnr.state.ga.us
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Historic Preservation Division, Georgia Department of Natural Resources has reviewed the Alternative Energy Draft Programmatic EIS. Our comments are offered to assist federal agencies in complying with Section 106 of the National Historic Preservation Act of 1966, as amended. Based on our review, it is our opinion that the measures proposed are adequate to address potential impacts to cultural resources associated with this undertaking.

Questions about submitting comments over the Web? Contact us at: ocseenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80025-001

From: ocseenergywebmaster@anl.gov
To: ocseenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80027
Date: Thursday, May 03, 2007 7:26:06 PM

Thank you for your comment, ann west.

The comment tracking number that has been assigned to your comment is 80027. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 3, 2007 07:26:56PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80027

First Name: ann
 Last Name: west
 Address:
 City:
 State: SC
 Zip:
 Country: USA
 Privacy Preference: Withhold address only from public record

Comment Submitted:

I am strongly supportive of the development of energy from wind, currents and waves off of the S.C. coast. I have seen the turbines and they are not at all offensive. We need to be aggressive in finding more sources of energy.

80027-001

Questions about submitting comments over the Web? Contact us at: ocseenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80029
Date: Friday, May 04, 2007 5:55:54 AM

Thank you for your comment, kathryn reilly.

The comment tracking number that has been assigned to your comment is 80029. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 4, 2007 05:56:41AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
 Draft Comment: 80029

First Name: kathryn
 Last Name: reilly
 Address: 1917 Woodduck Lane
 City: Surfside Beach
 State: SC
 Zip: 29575
 Country: USA
 Email: redcounter@hotmail.com
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

So excited that you are pursuing off shore Alternative Wind Energy Generation program! It is long past time for us to thoroughly utilize these type of resources, rather than our continued reliance on fossil fuels and coal. Also, strongly prefer this type of energy generation, along with hydro power and solar power versus the extremely expensive and potentially hazardous nuclear power alternatives. Would strongly support all funding to go towards the renewable alternatives, including bioenergy, rather than ANY further incentives or funding for nuclear power!

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80029-001

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80030
Date: Friday, May 04, 2007 10:46:05 AM
Attachments: Word_Wind_Farm_EIS_80030.doc

Thank you for your comment, John Beckerle.

The comment tracking number that has been assigned to your comment is 80030. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 4, 2007 10:46:54AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
 Draft Comment: 80030

First Name: John
 Middle Initial: C
 Last Name: Beckerle
 Organization: Scientific Applications Research Associates
 Address: P.O.Box 649
 City: Falmouth
 State: MA
 Zip: 02541-0649
 Country: USA
 Email: sara.jcb@verizon.net
 Privacy Preference: Don't withhold name or address from public record
 Attachment: /Users/johnbeckerle/Desktop/iBook Data folder/SARA FOLDER/Word Wind Farm EIS.doc

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

Scientific Consulting
& Research

John C. Beckerle, Ph.D.
Senior Consultant

SARA
Scientific Applications Research Associates

508 548 5545
sara.jcb@verizon.net
john.beckerle@verizon.net

P.O. Box 649
Falmouth, MA
02541-0649

MMS Alternative Energy and Alternate Use Programmatic EIS
Argonne National Laboratory
9700 S. Cass Avenue, EVS/900
Argonne, IL 60439

Gentlemen,

The off shore wind turbine project in the Sound near Nantucket Island should be held up until the results of the effects on draining power from the those winds has gone through an extensive computer modeling study. My reasons for this request are in part as follows:

It is the likely hypothesis about why Cape Cod is especially unique as described below in having very few hurricanes. The data supporting this is that damage from hurricanes is really a rare event on Cape Cod. Most hurricanes pass to west of Woods Hole, MA, or pass far to the east of Chatham. There was the 1938 hurricane that struck Providence, R.I., and wind damage and tidal effects were felt on western Cape Cod. That may have been a Cat.4. Since then in 1952 there were two hurricanes of Cat. 3 that occurred which affected Cape Cod. No other hurricane of Cat 3 has occurred since that time. Hurricane Bob in 1991 was at most a Cat. 2 storm, and it did some damage but no deaths were reported. It is also well known that the conservation of potential vorticity requires that hurricane intensities decrease as they move northward. Additionally, global warming may also be a factor to consider concerning hurricane strengths.

The hypothesis of what makes Cape Cod unique is it's geophysical environment in summer hurricane season. There are very cold waters in Cape Cod Bay on the northern side because of the southward moving Labrador currents from the north and very warm waters on the southern side caused by the Gulf Stream. This environment provides a local baroclinic zone across Cape Cod that generates in accordance with the well known thermal wind equation a strong wind to the east all along the eastward length of Cape Cod that increases in strength with height. The hypothesis claims that this wind pushes hurricanes

eastward so that most pass far out to sea much beyond the town of Chatham. Funding is being sought to study this hypothesis with computer modeling. It is my contention that an extensive off shore turbine wind farm in Nantucket Sound may substantially reduce the protective effect of the winds that result from the local baroclinic zone that exists across Cape Cod and the Islands during hurricane season.

Unbeknownst to me, a study of this hypothesis may already have been completed and considered in the review process of the Nantucket Sound Wind Farm. If not, then I would be pleased to cooperate with government agencies in assisting in further exploration of this likely hypothesis. The urgency of this study should not be underestimated as the effects of hurricane damage can be disastrous.

I expect a prompt response from your agency regarding my concerns and if not received in two weeks from the date of this letter, I will initiate contact with you. In view of the urgency of this computer modeling study, I am currently in the process of seeking funds to support the research required to produce a report for consideration. This is the reason why I have appealed to you in this letter to hold in abeyance any approval for the Nantucket Sound Turbine Wind Farm until a final report of this investigation is completed. If enough funding is obtained it should be possible to have a preliminary report within this year.

Thank you for your prompt attention of this matter.

Sincerely yours,

John C. Beckerle, Ph.D., President
Scientific Applications Research Associates
P.O. Box 649
Falmouth MA 02541-0649

80030-001

80030-001
(cont.)

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives](#);
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80032
Date: Sunday, May 06, 2007 8:16:30 AM
Attachments: OCSProgrammaticEISComments_2_80032.doc

Thank you for your comment, Michael Arendt.

The comment tracking number that has been assigned to your comment is 80032. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 6, 2007 08:17:19AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80032

First Name: Michael
Middle Initial: D
Last Name: Arendt
Address: 1453 Battery Brown Ct
City: Charleston
State: SC
Zip: 29412
Country: USA
Email: surfbio1@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\Michael D. Arendt\My Documents
\Surfrider\Speaking\OCSProgrammaticEISComments_2.doc

Comment Submitted:
Hello,

I submitted a lengthy comment yesterday (#80031), but later realized there was a typo in my closing paragraph (I mistakenly stated "non-renewable" when I meant to state "renewable").

Can you please replace that posting with this one, which has the corrected text?

Thanks!

Questions about submitting comments over the Web? Contact us at:

Hello,

My name is Michael Arendt and I went on record (as a private citizen) at the public hearing in Charleston, SC, on May 3, 2007; however, I wish to add a few additional comments.

Conceptually, I endorse implementation of renewable energy projects on the OCS, particularly given your insistence that any use of the land for purposes other than stated in the lease agreement would be highly illegal and would be prosecuted extensively.

In accordance with the consensus of the audience at the public hearing I attended, I agree that placement of equipment and mitigation to avoid environmental and social mishaps should be the two most important considerations for specific project proposals. We have much to learn from our brothers and sisters overseas, and it would be unwise not to learn from international experience. Similarly, we already have a vast array of towers and cables strewn across our own continental shelf, thus, there are many domestic examples of co-existence of technology and marine life from which we can learn as well.

With regards to monitoring the effectiveness of post-construction mitigation measures, I also wish to add that because the burden for such monitoring/research will be borne by the lease purchaser, that the MMS should also require that the actual data (as well as a summary report) be made public. In my experience as a grant-supported researcher, although peer-reviewed publication is encouraged, the only true grant deliverable is submission of a final report to the granting agency. Thus, if the granting agency is a private (rather than a tax-supported) entity, it is conceivable that the summary report would either (1) only reveal findings satisfactory to the funding entity or (2) not be distributed externally if the findings are contrary to the continued operation of energy harvesting on the leased land.

Economically, these projects will be difficult to initiate, particularly when they are competing against subsidized energy sources such as coal and natural gas. According to the Department of Energy, nearly three-fourths of our domestic energy consumption is attributed to electricity and manufacturing needs; thus, reduction in the use of non-renewable energy sources to support such needs will have a considerably greater impact in reducing the production of greenhouse gases than efforts to improve transportation fuel-efficiency (although such improvements should still be adamantly encouraged). Given the significance of coal and natural gas as greenhouse gas producers, I respectfully request that your office also take action to progressively shift federal subsidies from coal and natural gas production to renewable energy sources, especially as programs on the OCS become established, to ensure their economic viability and competitiveness with the "China price" of energy.

Lastly, I would also like to know if it would be possible to be placed on a mailing list of potential project reviewers, should a proposal off the SC Coast. Given that the purpose of the public hearing last week was generic in origin, I would appreciate the opportunity to be alerted to any projects which may affect the coast where I live, in order to properly evaluate the merits and potential concerns.

I applaud your office for pursuing this line of action, as we all have a role to play in reducing our energy demand and increased use of renewable resources. Although renewable energy projects on the OCS will not solve energy issues on a national level, they will nonetheless contribute greatly (particularly regionally) towards a permanent solution. If for no other reason, such efforts should be encouraged.

Sincerely,

Michael D. Arendt

80032-001

80032-002

80032-003

80032-004

80032-005

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80033
Date: Wednesday, May 09, 2007 7:18:54 AM

Thank you for your comment, Dave andTami Ballard.

The comment tracking number that has been assigned to your comment is 80033. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 9, 2007 07:19:50AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
 Draft Comment: 80033

First Name: Dave andTami
 Last Name: Ballard
 Address: 2607 Camp Phillips Rd
 City: Wausau
 State: WI
 Zip: 54403
 Country: USA
 Email: RoyalFlight@yahoo.com
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
 Please do safe fish farms, without the danger of oil spills, and economic and health hazzard.

80033-001

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80034
Date: Wednesday, May 09, 2007 8:04:44 AM

Thank you for your comment, Sascha Bollag.

The comment tracking number that has been assigned to your comment is 80034. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 9, 2007 08:05:49AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
 Draft Comment: 80034

First Name: Sascha
 Last Name: Bollag
 Address: 217 5th St SE
 City: Washington
 State: DC
 Zip: 20003
 Country: USA
 Email: sbollag@gmail.com
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
 Dear Mr. Chris Oynes:

Thank you for the opportunity to comment on your draft Programmatic Environmental Impact Statement.

I am concerned that MMS plans to allow energy companies to abandon unused oil platforms instead of requiring companies to remove them as mandated by federal law. MMS should not allow energy companies to avoid paying the costs of removing their rigs, estimated to be \$9.9 billion from 1985-2020, when nothing in the 2005 Energy Act gives MMS such new authority.

80034-001

I also am concerned that MMS plans to establish a program to permit industrial fish farming in federal waters even though Congress has not specifically authorized this activity. This would exceed MMS's mandate and capacity, which is clear given that the draft PEIS does not adequately address the ecological, human health, and economic impacts of fish farming. Specifically, fish farms

80034-002

anchored off oil rigs may:

- Cause long-term contamination of the marine environment due to the abandoned oil rigs.
- Threaten the environment and consumers because of the connection between oil and gas rigs and elevated mercury levels in surrounding sediments and fish.
- Harm consumers by using chemicals, antibiotics, and hormones to raise fish in crowded conditions.
- Harm the marine environment through transmission of disease and parasites to wild fish populations.
- Deplete wild fish populations because farmed finfish require wild fish for feed.
- Harm marine ecosystems when non-native or genetically distinct farmed fish escape and interact with wild fish populations.

I respectfully request that you consider these factors and do not exceed the authority granted to you under the Energy Act of 2005.

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80034-002
(cont.)

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80035
Date: Wednesday, May 09, 2007 8:26:44 AM

Thank you for your comment, Sarah Davidson.

The comment tracking number that has been assigned to your comment is 80035. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 9, 2007 08:27:44AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80035

First Name: Sarah
 Last Name: Davidson
 City: Washington
 State: DC
 Country: USA
 Email: sgd8@cornell.edu
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Dear Mr. Chris Oynes:

Thank you for the opportunity to comment on your draft Programmatic Environmental Impact Statement.

I am concerned that MMS plans to allow energy companies to abandon unused oil platforms instead of requiring companies to remove them as mandated by federal law. MMS should not allow energy companies to avoid paying the costs of removing their rigs, estimated to be \$9.9 billion from 1985-2020, when nothing in the 2005 Energy Act gives MMS such new authority.

80035-001

I also am concerned that MMS plans to establish a program to permit industrial fish farming in federal waters even though Congress has not specifically authorized this activity. This would exceed MMS's mandate and capacity, which is clear given that the draft PEIS does not adequately address the ecological, human health, and economic impacts of fish farming. Specifically, fish farms anchored off oil rigs may:

80035-002

- Cause long-term contamination of the marine environment due to the abandoned oil rigs.
- Threaten the environment and consumers because of the connection between oil and gas rigs and elevated mercury levels in surrounding sediments and fish.
- Harm consumers by using chemicals, antibiotics, and hormones to raise fish in crowded conditions.
- Harm the marine environment through transmission of disease and parasites to wild fish populations.
- Deplete wild fish populations because farmed finfish require wild fish for feed.
- Harm marine ecosystems when non-native or genetically distinct farmed fish escape and interact with wild fish populations.

I respectfully request that you consider these factors and do not exceed the authority granted to you under the Energy Act of 2005.

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80035-002
(cont.)

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80036
Date: Wednesday, May 09, 2007 10:07:56 AM

Thank you for your comment, chris white.

The comment tracking number that has been assigned to your comment is 80036. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 9, 2007 10:08:52AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
 Draft Comment: 80036

First Name: chris
 Last Name: white
 State: ID
 Zip:
 Country: USA
 Email: cwhite@coldreams.com
 Privacy Preference: Withhold address only from public record

Comment Submitted:
 fish farming has not been done without harm to the environment yet, and I see no plans to improve on that record.

80036-001

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives](#);
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80037
Date: Wednesday, May 09, 2007 12:24:40 PM

Thank you for your comment, briana gauger.

The comment tracking number that has been assigned to your comment is 80037. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 9, 2007 12:25:41PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80037

First Name: briana
Last Name: gauger
Address: 648 s. 12th st. #d1
City: lincoln
State: NE
Zip: 68508
Country: USA
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Dear Mr. Chris Oynes:

Thank you for the opportunity to comment on your draft Programmatic Environmental Impact Statement.

I am concerned that MMS plans to allow energy companies to abandon unused oil platforms instead of requiring companies to remove them as mandated by federal law. MMS should not allow energy companies to avoid paying the costs of removing their rigs, estimated to be \$9.9 billion from 1985-2020, when nothing in the 2005 Energy Act gives MMS such new authority.

80037-001

I also am concerned that MMS plans to establish a program to permit industrial fish farming in federal waters even though Congress has not specifically authorized this activity. This would exceed MMS's mandate and capacity, which is clear given that the draft PEIS does not adequately address the ecological, human health, and economic impacts of fish farming. Specifically, fish farms anchored off oil rigs may:

80037-002

- * Cause long-term contamination of the marine environment due to the abandoned oil rigs.
- * Threaten the environment and consumers because of the connection between oil and gas rigs and elevated mercury levels in surrounding sediments and fish.
- * Harm consumers by using chemicals, antibiotics, and hormones to raise fish in crowded conditions.
- * Harm the marine environment through transmission of disease and parasites to wild fish populations.
- * Deplete wild fish populations because farmed finfish require wild fish for feed.
- * Harm marine ecosystems when non-native or genetically distinct farmed fish escape and interact with wild fish populations.

I respectfully request that you consider these factors and do not exceed the authority granted to you under the Energy Act of 2005.

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80037-002
(cont.)

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80038
Date: Wednesday, May 09, 2007 1:03:18 PM

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is 80038. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 9, 2007 01:04:22PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80038

First Name:
Middle Initial:
Last Name:
Address:
City:
State: MI
Zip:
Country: USA
Email:
Privacy Preference: Withhold name and address from public record

Comment Submitted:
Dear Mr. Chris Oynes:

Thank you for the opportunity to comment on your draft Programmatic Environmental Impact Statement.

I am concerned that MMS plans to allow energy companies to abandon unused oil platforms instead of requiring companies to remove them as mandated by federal law. MMS should not allow energy companies to avoid paying the costs of removing their rigs, estimated to be \$9.9 billion from 1985-2020, when nothing in the 2005 Energy Act gives MMS such new authority.

80038-001

I also am concerned that MMS plans to establish a program to permit industrial fish farming in federal waters even though Congress has not specifically authorized this activity. This would exceed MMS's mandate and capacity, which is clear given that the draft PEIS does not adequately address the ecological,

80038-002

human health, and economic impacts of fish farming. Specifically, fish farms anchored off oil rigs may:

- Cause long-term contamination of the marine environment due to the abandoned oil rigs.
- Threaten the environment and consumers because of the connection between oil and gas rigs and elevated mercury levels in surrounding sediments and fish.
- Harm consumers by using chemicals, antibiotics, and hormones to raise fish in crowded conditions.
- Harm the marine environment through transmission of disease and parasites to wild fish populations.
- Deplete wild fish populations because farmed finfish require wild fish for feed.
- Harm marine ecosystems when non-native or genetically distinct farmed fish escape and interact with wild fish populations.

I respectfully request that you consider these factors and do not exceed the authority granted to you under the Energy Act of 2005.

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80038-002
(cont.)

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives@anl.gov
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80039
Date: Wednesday, May 09, 2007 3:05:32 PM

Thank you for your comment, Mary Lebert.

The comment tracking number that has been assigned to your comment is 80039. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 9, 2007 03:06:25PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80039

First Name: Mary
Last Name: Lebert
Country: USA
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Dear Mr. Chris Oynes:

Thank you for the opportunity to comment on your draft Programmatic Environmental Impact Statement.

I am concerned that MMS plans to allow energy companies to abandon unused oil platforms instead of requiring companies to remove them as mandated by federal law. MMS should not allow energy companies to avoid paying the costs of removing their rigs, estimated to be \$9.9 billion from 1985-2020, when nothing in the 2005 Energy Act gives MMS such new authority.

80039-001

I also am concerned that MMS plans to establish a program to permit industrial fish farming in federal waters even though Congress has not specifically authorized this activity. This would exceed MMS's mandate and capacity, which is clear given that the draft PEIS does not adequately address the ecological, human health, and economic impacts of fish farming. Specifically, fish farms anchored off oil rigs may:

80039-002

- Cause long-term contamination of the marine environment due to the abandoned oil rigs.
- Threaten the environment and consumers because of the connection between

- oil and gas rigs and elevated mercury levels in surrounding sediments and fish.
- Harm consumers by using chemicals, antibiotics, and hormones to raise fish in crowded conditions.
- Harm the marine environment through transmission of disease and parasites to wild fish populations.
- Deplete wild fish populations because farmed finfish require wild fish for feed.
- Harm marine ecosystems when non-native or genetically distinct farmed fish escape and interact with wild fish populations.

I respectfully request that you consider these factors and do not exceed the authority granted to you under the Energy Act of 2005.

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80039-002
(cont.)

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80040
Date: Wednesday, May 09, 2007 4:00:41 PM

Thank you for your comment, Lee Frank.

The comment tracking number that has been assigned to your comment is 80040. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 9, 2007 04:01:41PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80040

First Name: Lee
Last Name: Frank
State: CA
Zip: 91403-4103
Country: USA
Email: bg214@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

I am concerned that MMS plans to allow energy companies to abandon unused oil platforms instead of requiring companies to remove them as mandated by federal law. MMS SHOULD NOT ALLOW energy companies to avoid paying the costs of removing their rigs, estimated to be \$9.9 billion from 1985-2020, when nothing in the 2005 Energy Act gives MMS such new authority.

I also am concerned that MMS plans to establish a program to permit industrial fish farming in federal waters even though CONGRESS HAS NOT SPECIFICALLY ENDORSED THIS ACTIVITY. This would exceed MMS's mandate and capacity, which is clear given that the draft PEIS does not adequately address the ecological, human health, and economic impacts of fish farming. Specifically, fish farms anchored off oil rigs may:

- Cause long-term contamination of the marine environment due to the abandoned oil rigs.
- Threaten the environment and consumers because of the connection between oil and gas rigs and elevated mercury levels in surrounding sediments and fish.

- Harm consumers by using chemicals, antibiotics, and hormones to raise fish in crowded conditions.
- Harm the marine environment through transmission of disease and parasites to wild fish populations.
- Deplete wild fish populations because farmed finfish require wild fish for feed.
- Harm marine ecosystems when non-native or genetically distinct farmed fish escape and interact with wild fish populations.

I respectfully request that you consider these factors and do not exceed the authority granted to you under the Energy Act of 2005.

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80040-002
(cont.)

80040-001

80040-002

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80041
Date: Wednesday, May 09, 2007 10:13:45 PM

Thank you for your comment, Brady Nash.

The comment tracking number that has been assigned to your comment is 80041. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 9, 2007 10:14:42PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80041

First Name: Brady
Middle Initial: A
Last Name: Nash
Country: USA
Email: nashlabs@gmail.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Dear Mr. Chris Oynes:

Thank you for the opportunity to comment on your draft Programmatic Environmental Impact Statement.

I am concerned that MMS plans to allow energy companies to abandon unused oil platforms instead of requiring companies to remove them as mandated by federal law. MMS should not allow energy companies to avoid paying the costs of removing their rigs, estimated to be \$9.9 billion from 1985-2020, when nothing in the 2005 Energy Act gives MMS such new authority.

80041-001

I also am concerned that MMS plans to establish a program to permit industrial fish farming in federal waters even though Congress has not specifically authorized this activity. This would exceed MMS's mandate and capacity, which is clear given that the draft PEIS does not adequately address the ecological, human health, and economic impacts of fish farming. Specifically, fish farms anchored off oil rigs may:

80041-002

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- Threaten the environment and consumers because of the connection between oil and gas rigs and elevated mercury levels in surrounding sediments and fish.
- Harm consumers by using chemicals, antibiotics, and hormones to raise fish in crowded conditions.
- Harm the marine environment through transmission of disease and parasites to wild fish populations.
- Deplete wild fish populations because farmed finfish require wild fish for feed.
- Harm marine ecosystems when non-native or genetically distinct farmed fish escape and interact with wild fish populations.

80041-002
(cont.)

I respectfully request that you consider these factors and do not exceed the authority granted to you under the Energy Act of 2005.

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80042

The comment tracking number that has been assigned to your comment is 80042. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 10, 2007 03:25:32AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80042

First Name:
Last Name:
City:
State: CA
Zip:
Country: USA
Email:
Privacy Preference: Withhold name and address from public record

Comment Submitted:

Dear Mr. Chris Oynes:

Thank you for the opportunity to comment on your draft Programmatic Environmental Impact Statement.

I am concerned that MMS plans to allow energy companies to abandon unused oil platforms instead of requiring companies to remove them as mandated by federal law. MMS should not allow energy companies to avoid paying the costs of removing their rigs, estimated to be \$9.9 billion from 1985-2020, when nothing in the 2005 Energy Act gives MMS such new authority.

80042-001

I also am concerned that MMS plans to establish a program to permit industrial fish farming in federal waters even though Congress has not specifically authorized this activity. This would exceed MMS's mandate and capacity, which is clear given that the draft PEIS does not adequately address the ecological, human health, and economic impacts of fish farming. Specifically, fish farms anchored off oil rigs may:

- Cause long-term contamination of the marine environment due to the abandoned oil rigs.
- Threaten the environment and consumers because of the connection between oil and gas rigs and elevated mercury levels in surrounding sediments and fish.
- Harm consumers by using chemicals, antibiotics, and hormones to raise fish in crowded conditions.
- Harm the marine environment through transmission of disease and parasites to wild fish populations.
- Deplete wild fish populations because farmed finfish require wild fish for feed.
- Harm marine ecosystems when non-native or genetically distinct farmed fish escape and interact with wild fish populations.

80042-002

I respectfully request that you consider these factors and do not exceed the authority granted to you under the Energy Act of 2005.

Sincerely;

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80043
Date: Thursday, May 10, 2007 10:33:41 AM

Thank you for your comment, Reid Ten Kley.

The comment tracking number that has been assigned to your comment is 80043. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 10, 2007 10:34:45AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80043

First Name: Reid
Last Name: Ten Kley
Organization: Iliamna Fish Company LLC
Address: 3803 SE Lincoln St
City: Portland
State: OR
Zip: 97214
Country: USA
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Dear Mr. Chris Oynes:

Thank you for the opportunity to comment on your draft Programmatic Environmental Impact Statement.

I am concerned that MMS plans to allow energy companies to abandon unused oil platforms instead of requiring companies to remove them as mandated by federal law.

80043-001

Also, I hear that MMS is planning to push for industrial fish farming to be permitted on those old oil rigs. Fish farming has been attempted with DISASTROUS effects in the UK and Norway. Please please consult some of the residents of former fishing communities in these countries before making your final opinion on industrial fish farming.

80043-002

Fish farming is fine with me on land, in tanks, where the companies have to deal

with their own messes, but I am categorically opposed to the pollution from these operations just being allowed to dissipate in our oceans.

I respectfully request that you consider these factors and enforce the Energy Act of 2005 as it was written, and please talk with some other countries about fish farming before you decide to promote it here in the US.

thank you so much~!

Reid

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80043-002
(cont.)

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80044
Date: Thursday, May 10, 2007 8:11:53 PM

Thank you for your comment, Kim White-Claflin.

The comment tracking number that has been assigned to your comment is 80044. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 10, 2007 08:12:59PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80044

First Name: Kim
Last Name: White-Claflin
Address: 7250 Stephens
City: Center Line
State: MI
Zip: 48015
Country: USA
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Dear Mr. Chris Oynes:

Thank you for the opportunity to comment on your draft Programmatic Environmental Impact Statement.

I am concerned that MMS plans to allow energy companies to abandon unused oil platforms instead of requiring companies to remove them as mandated by federal law. MMS should not allow energy companies to avoid paying the costs of removing their rigs, estimated to be \$9.9 billion from 1985-2020, when nothing in the 2005 Energy Act gives MMS such new authority.

80044-001

I also am concerned that MMS plans to establish a program to permit industrial fish farming in federal waters even though Congress has not specifically authorized this activity. This would exceed MMS's mandate and capacity, which is clear given that the draft PEIS does not adequately address the ecological, human health, and economic impacts of fish farming. Specifically, fish farms anchored off oil rigs may:

80044-002

- Cause long-term contamination of the marine environment due to the abandoned oil rigs.
- Threaten the environment and consumers because of the connection between oil and gas rigs and elevated mercury levels in surrounding sediments and fish.
- Harm consumers by using chemicals, antibiotics, and hormones to raise fish in crowded conditions.
- Harm the marine environment through transmission of disease and parasites to wild fish populations.
- Deplete wild fish populations because farmed finfish require wild fish for feed.
- Harm marine ecosystems when non-native or genetically distinct farmed fish escape and interact with wild fish populations.

I respectfully request that you consider these factors and do not exceed the authority granted to you under the Energy Act of 2005.

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80044-002
(cont.)

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80045
Date: Friday, May 11, 2007 6:29:49 PM

Thank you for your comment, Bob McClure.

The comment tracking number that has been assigned to your comment is 80045. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 11, 2007 06:30:49PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
 Draft Comment: 80045

First Name: Bob
 Last Name: McClure
 Organization: BioSonics, Inc.
 Address: 4027 Leary Way NW
 City: Seattle
 State: WA
 Zip: 98107
 Country: USA
 Email: bmclure@biosonicsinc.com
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
 Recent developments in tidal and wave energy have been viewed by regulators as potentially impacting marine mammals, sea turtles, diving birds, and fish (among other things). New technology and capabilities for 24/7 monitoring has been required in some instances (RITE, NY East River, Verdant Power). The potential impacts of these OCS projects should not be overlooked nor dismissed because the ability to monitor them DOES exist and should be carefully examined to ensure that resource impacts are monitored and analyzed. SEE: http://www.devinetarbell.com/alternative_energy/ren_profiles/tidal_1.htm and <http://www.waterpowermagazine.com/story.asp?storyCode=2042494>

for summary details.

Questions about submitting comments over the Web? Contact us at:

80045-001

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80046
Date: Monday, May 14, 2007 1:35:11 PM

Thank you for your comment, Michael Johnson.

The comment tracking number that has been assigned to your comment is 80046. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 14, 2007 01:36:13PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80046

First Name: Michael
Middle Initial: D
Last Name: Johnson
Organization: Maine Historic Preservation Commission
Address: 55 Capitol Street
Address 2: 65 State House Station
City: Augusta
State: ME
Zip: 04333
Country: USA
Email: mike.d.johnson@maine.gov
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Our office is concerned about the grouping of all historic properties, including historic structures, districts, etc. under the heading of "archaeological resources". We feel this heading should be changed to "historic properties" as defined under Section 106 of the National Historic Preservation Act, which is inclusive of all cultural resources evaluated under the Act. Additionally, under the heading of "historic properties", archaeological resources should be addressed under a separate subheading from above ground resources, as identification efforts and potential effects for the respective resources can differ significantly.

Questions about submitting comments over the Web? Contact us at:

80046-001

From: ocsenergywebmaster@anl.gov
To: ocsenergyarchives;
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80047
Date: Monday, May 14, 2007 6:24:16 PM
Attachments: OCS_energy_and_aquaculture_DEIS_comments_80047.doc

Thank you for your comment, Doug Heiken.

The comment tracking number that has been assigned to your comment is 80047. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 14, 2007 06:25:26PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80047

First Name: Doug
Last Name: Heiken
Organization: Oregon Wild, formerly Oregon Natural Resources Council
Address: PO Box 11648
City: Eugene
State: OR
Zip: 97440
Country: USA
Email: dh@oregonwild.org
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\netcops\My Documents\InShynch\Comments\Misc. comments\OCS energy and aquaculture DEIS comments.doc

Questions about submitting comments over the Web? Contact us at:
ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.



OREGON WILD

Formerly Oregon Natural Resources Council (ONRC)

PO Box 11648 | Eugene OR 97440 | 541-344-0675 | fax 541-343-0996
oh@oregonwild.org | <http://www.oregonwild.org/>

14 May 2007

Submitted via:
<http://ocsenergy.anl.gov/involve/comments/index.cfm>

Subject: Oregon Wild comments on the OCS Renewable Energy and Alternate Use Programmatic EIS.

Dear DOE:

Please accept the following comments from Oregon Wild (formerly Oregon Natural Resources Council) concerning the OCS Renewable Energy and Alternate Use Programmatic Draft EIS noticed here: <http://ocsenergy.anl.gov/>

1. Oregon Wild supports the careful balancing of the important interests in renewable energy development and ecological conservation. The benefits and impacts are often hard to compare because they are so different (like apples and oranges) but the EIS must present the costs and benefits in terms that lend themselves of balancing and comparison.
2. We are concerned that aquaculture development is not an appropriate use of our ocean resources. Aquaculture can decimate passing schools of small fish, and aquaculture can spread disease. It is much better to manage our natural ocean ecosystems sustainably. The impacts of not only non-native cultured species, but even native species that are cultured become genetically simplified and can harm native species when they inevitably escape. Salmon hatcheries are an example of a failed attempt to culture native species which ultimately resulted in harm to the native populations.
3. Climate change is a huge concern. Climate change is already having a significant impact on our oceans with new and expanding "dead zones," changing currents, and upwelling phenomena, changing patters of migration and community composition of marine ecosystems. Climate change demands actions that may be directly conflicting such as the need for alternative (non-carbon) energy and the need for intact marine ecosystems that can capture and store carbon, we should develop a comprehensive plan for addressing climate change before embarking on new development of the continental shelf.

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4. It is important to establish a network of marine reserves before developing off-shore energy and other uses. Marine reserves are especially important to maintain healthy populations structures for marine species such as rock fish, cod, and many others.
5. We recently learned that buoys deployed to recover wave energy may have serious adverse impacts on whales, because each buoy is anchored by three horizontal cables that can entangle whales.
6. Ecological impacts must be much more carefully described and analyzed. Qualitative descriptors like negligible, minor, moderate, and major don't really capture the full effects of the proposed OCS developments.
7. The DEIS needs to better address the cumulative impacts of all the different OCS developments, climate change and other human-induced stressors on all the different resource values. The DEIS breaks out the impacts by the type of development but does not add up all the impacts on the individual ocean resource values.
8. The DEIS should contain more maps showing key ocean resources like areas of high use by marine mammals, turtles, fish, and sea birds, etc. and the location of possible OCS developments. Geographic overlap is a good way to capture an overview of cumulative impacts.
9. Before allowing large scale development of ocean resources, the federal government should ensure that ecological resources are adequately protected. The alternatives should consider establishment of large ocean reserves where these technologies are not allowed and where ecosystem processes can play out without substantial human interference. Conserving ecological processes and biodiversity are integral to this task. As described by Noss and Cooperrider (1994), four fundamental principles consistent with biodiversity conservation are to:
 - Represent, in a system of protected areas, all native ecosystem types and seral stages across their natural range of variation.
 - Maintain viable populations of all native species in natural patterns of abundance and distribution.
 - Maintain ecological and evolutionary processes such as disturbance regimes, hydrological processes, nutrient cycles, and biotic interactions.
 - Manage landscapes and communities that are responsive to short-term and long-term environmental change and that maintain the evolutionary potential of the biota.
10. Ocean resources, especially stocks of valuable fish, have been severely depleted and need to be restored lest we continue to keep "fishing down the food chain." We have an ethical obligation to not only maintain options for future generations, but even try to restore options that may already have been eliminated. Please ensure that off-shore energy development does not inhibit restoration and recovery of ocean species and ecosystems.
11. Principles of intergenerational equity require that we hold the earth and its resources in trust. To do otherwise is morally unacceptable. We have both rights

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80047-010

and responsibilities that flow from the fact that we hold the Earth in trust for future generations. At the same time, we are beneficiaries entitled to some use and benefit from the earth's resources, but those uses must be appropriate and limited.

Three principles form the basis of intergenerational equity. First, each generation should be required to conserve the diversity of the natural and cultural resource base, so that it does not unduly restrict the options available to future generations in solving their problems and satisfying their own values, and should also be entitled to diversity comparable to that enjoyed by previous generations. This principle is called "conservation of options." Second, each generation should be required to maintain the quality of the planet so that it is passed on in no worse condition than that in which it was received, and should also be entitled to planetary quality comparable to that enjoyed by previous generations. This is the principle of "conservation of quality." Third, each generation should provide its members with equitable rights of access to the legacy of past generations and should conserve this access for future generations. This is the principle of "conservation of access."

Edith Brown Weiss, Intergenerational equity: a legal framework for global environmental change. Chapter 12 in Edith Brown Weiss, editor. 1992. Environmental change and international law: New challenges and dimensions. United Nations University Press.
<http://www.unu.edu/unupress/unupbooks/uu25ee/uu25ee0y.htm>

We must reject formulations of intergeneration equity that fail to recognize the existence of scarcity, technological limits, irreversible environmental change, and the second law of thermodynamics. Examples of these unethical approaches include the "opulence model"

... in which the present generation consumes all that it wants today and generates as much wealth as it can, either because there is no certainty that future generations will exist or because maximizing consumption today is the best way to maximize wealth for future generations. This model overlooks the long-term degradations of the planet that may be generated, such as irreversible losses of species diversity ... A variant of the opulence model is the technology model, in which we do not need to be concerned about the environment for future generations, because technological innovation will enable us to introduce infinite resource substitution. While technology will undoubtedly enable us to develop some substitutes for certain resources and to use resources more efficiently, it is by no means assured that it will suffice or will make the robustness of the planet irrelevant.

Id. The technology model might provide a plausible explanation for how some energy might be replaced in the marketplace, because as prices rise, alternative technologies take part of the market share, but for "ecosystem services" that are not traded in the marketplace, the technology model cannot explain how we will replace the ecological services of keystone species.

80047-010
(cont.)

12. Consider the life-cycle energy costs of these energy technologies. Will more energy be invested in the program than can be extracted? For instance, the energy used to compress hydrogen is almost as much as the hydrogen releases upon combustion. Hydrogen losses during transmission and transfer are also quite large. Consider onshore support facilities, maintenance, replacement, and other lifecycle impacts.
13. Consider the life-cycle economic costs of the technologies. Will we spend more money on these projects than they earn? The EIS should consider consequences of ending all the direct and indirect subsidies for fossil fuels.
14. Consider the life-cycle social costs of these technologies. Will the impacts to fishermen, bird watchers, and whale watchers outweigh the social benefits?
15. Consider the fish & wildlife impacts. Currents of wind and water are used by a wide variety of fish and wildlife. Exploiting those current to extract energy could interfere with the use of those currents by fish & wildlife. The EIS must consider the unique impacts associated with the conflicting uses of currents for energy production and wildlife.
16. Please take a "systems view" and an individual species view. The systems view recognizes that small changes in initial conditions can unfold to cause significant wide-spread impacts, a famous example is known as the "butterfly catastrophe." The ocean is dynamic. Currents change, the ocean floor changes, winds change all these changes occur on many time scales and spatial scales. Consider nested, multiple scales of ecological organization in your NEPA analysis.
17. Complexity theory tells us that the interaction of simple ecological processes can have very complex consequences. Ecosystems are complex adaptive systems with dynamic self-organizing qualities that can shift (sometimes abruptly) or cycle (somewhat predictably) between multiple pseudo-stable "attractor states." In complex systems, neither positive-feedback (amplifiers) or negative-feedback (suppressors) dominate, but both operate within the system to bring about tendencies toward both equilibrium and disequilibrium, creating emergent properties in non-linear, far-from-equilibrium systems. The resource pools, rates of ecological processes, and time lags between events must also be carefully considered. See Ecological Complexity: An International Journal on Biocomplexity <http://www.environmental-expert.es/magazine/elsevier/ecocom/> Richard Solé and Brian Goodwin. 2000. Signs of Life: How Complexity Pervades Biology. Basic Books. New York.
18. Please include rigorous scientific review of the impacts and alternatives. Is the EIS to be subject to review by an independent panel of experts?
19. Consider issues of scale, cumulative impacts, climate variability (both the impacts of climate variability ON these technologies (i.e. will the currents and waves still be there in the future?), and the impacts of these technologies on climate variability). As the climate warms, the temperature gradient between the equator and the poles is expected to diminish and with it some of the dynamics of the

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ocean/atmospheric system. Will this mean it will be harder to extract energy from the ocean?

20. Consider the impacts of tsunamis, especially in seismically active areas such as the West Coast or near the mouths of large rivers where large amounts of sediment are deposited and poised for mass movement. Building hard structures in this area is not wise, nor would it be wise to store hydrogen in this area.
21. Please consider that wave action is needed to move littoral material. Technologies that dampen wave energy may limit the natural littoral processes such as the replenishment of beach sand and the opening and closing of the mouths of rivers and streams.

Thank you for considering these comments.

Sincerely,



Doug Heiken

80047-018
(cont.)

80047-019

80047-020

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80048
Date: Tuesday, May 15, 2007 1:23:11 PM

Thank you for your comment, Barbara Hill.

The comment tracking number that has been assigned to your comment is 80048. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 15, 2007 01:24:17PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80048

First Name: Barbara
Middle Initial: J
Last Name: Hill
Organization: Clean Power Now
Address: 297 North Street
Address 2: Suite 322A
City: Hyannis
State: MA
Country: USA
Email: bhill@cleanpowernow.org
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

I write on behalf of Clean Power Now, a 501 (c) (3) nonprofit, grassroots organization, with over 7000 members, whose mission is to inform, educate and empower citizens to support viable renewable energy projects and policies. A primary focus of Clean Power Now is to support the Cape Wind project, America's first proposed off shore utility scale wind project. Kindly visit our website, www.cleanpowernow.org, for information on Clean Power Now's activities.

Thank you for providing me this opportunity to comment on the draft Programmatic Environmental Impact Statement for Alternative Energy Development and Production & Alternate Use of Facilities on the Outer Continental Shelf.

80048-001

We urge the MMS to expedite, without further delay, the regulations and policies to advance siting of alternative energy projects on the Outer Continental Shelf. The priority is on siting particular projects as expeditiously as is reasonable and as soon as developers are ready to move forward.

The U.S. Department of Energy has estimated that over 900,000 megawatts of potential wind energy off the coasts of the United States, in many cases, relatively near major population centers. This amount approaches the total current installed U.S. electrical capacity. Developing these untapped resources is a critical step towards mitigating the harmful effects of air pollution from the burning of fossil fuels.

In January of this year an interdisciplinary team of researchers from the University of Delaware and Stanford University published a peer reviewed wind power study finding the wind resource off the Mid-Atlantic coast could supply the energy needs of nine states from Massachusetts to North Carolina, plus the District of Columbia--with enough left over to support a 50 percent increase in future energy demand.

A recent report from the Intergovernmental Panel on Climate Change, whose final version was issued in Bangkok on May 4, says emissions can be cut below current levels if the world shifts away from carbon-heavy fuels, embraces energy efficiency and moves aggressively towards use of renewable energy. "The opportunities, the technology are there, and now it's a case of encouraging the increased use of these technologies."

Former Assistant Secretary for Energy Efficiency and Renewable Energy, David K. Garman, in a letter to the Army Corp of Engineers, dated March 31, 2005 stated ..."utility-scale projects like Cape Wind are important to our national interest and a critical first step to building a domestic, globally competitive wind industry. Success in this project could also lay the foundation for a focused national investment to develop offshore wind technology in the coming years."

ISO New England the not-for-profit corporation responsible for the day to day reliable operation of New England's bulk energy generation and transmission systems has stated that we have a critical need to diversify our energy portfolio and they have warned us that they don't know how we are going to meet peak demand as early as 2008.

If we are to be part of solving the urgent problems of climate change and energy independence we need to act NOW!

We have an indigenous supply of inexhaustible renewable energy right off our coast and for our children we have a profound responsibility to tap that resource. We have already occurring global warming and climate change with the

attendant devastating effects.

We have the potential economic opportunities around being world leaders in a competitive global industry. And we have a critical need to diversify our energy portfolio in New England due to a dangerously high dependence on natural gas

I implore you not to delay any further the authority given to you by the Energy Policy Act of 2005 to develop and put in place the regulations for Alternative Energy activities on the Outer Continental Shelf in order to facilitate faster development of this critical energy industry.

There is a growing urgency. Your work is critical.

Clean Power Now remains committed to continuing to work with Minerals Management Service specifically as it relates to stakeholder concerns, coordination and participation.

Sincerely,

Barbara J. Hill
Executive Director
Clean Power Now

Questions about submitting comments over the Web? Contact us at: ocsenerywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80048-001
(cont.)

80048-001
(cont.)

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives;](#)
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80049
Date: Tuesday, May 15, 2007 1:49:35 PM

Thank you for your comment, Elizabeth Kress.

The comment tracking number that has been assigned to your comment is 80049. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 15, 2007 01:50:48PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80049

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Middle Initial: A
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Comment Submitted:
Santee Cooper (South Carolina Public Service Authority) is considering offshore wind as a renewable alternative source of energy for electricity.

Based on some internal discussions about the MMS and its current activities to establish regulations and procedures for the development of wind, I offer these few general comments:

MMS states that 5-7 years forward is its timeframe of consideration for rulemaking. Looking from today forward, the MMS should consider ways to encourage offshore wind and not to raise barriers of entry. Lease costs and the threat of competitive bidding of prospective sites which have been put forward for permitting (resulting in lost time and money) are both dis-incentives to a utility. Alongside of the barriers to entry just named, the uncertainty of the

future rules adds a risk that would push a cautious investor to require a higher return than otherwise might be needed. Offshore wind is currently a higher cost, higher risk option to conventional power production. Santee Cooper will be seeking guidance from MMS in order to realistically evaluate the feasibility of developing this resource. The designation and availability of a contact person within MMS for our inquiries would be most appreciated.

80049-001
(cont.)

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80049-001

From: ocsenergywebmaster@anl.gov
To: [ocsenergyarchives](#);
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80050
Date: Wednesday, May 16, 2007 6:25:06 AM

Thank you for your comment, Suzanne Valencia.

The comment tracking number that has been assigned to your comment is 80050. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 16, 2007 06:26:17AM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80050

First Name: Suzanne
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Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Dear Mr. Chris Oynes:

Thank you for the opportunity to comment on your draft Programmatic Environmental Impact Statement.

I am concerned that MMS plans to allow energy companies to abandon unused oil platforms instead of requiring companies to remove them as mandated by federal law. MMS should not allow energy companies to avoid paying the costs of removing their rigs, estimated to be \$9.9 billion from 1985-2020, when nothing in the 2005 Energy Act gives MMS such new authority.

I also am concerned that MMS plans to establish a program to permit industrial fish farming in federal waters even though Congress has not specifically authorized this activity. This would exceed MMS's mandate and capacity, which is clear given that the draft PEIS does not adequately address the ecological,

human health, and economic impacts of fish farming. Specifically, fish farms anchored off oil rigs may:

- Cause long-term contamination of the marine environment due to the abandoned oil rigs.
- Threaten the environment and consumers because of the connection between oil and gas rigs and elevated mercury levels in surrounding sediments and fish.
- Harm consumers by using chemicals, antibiotics, and hormones to raise fish in crowded conditions.
- Harm the marine environment through transmission of disease and parasites to wild fish populations.
- Deplete wild fish populations because farmed finfish require wild fish for feed.
- Harm marine ecosystems when non-native or genetically distinct farmed fish escape and interact with wild fish populations.

I respectfully request that you consider these factors and do not exceed the authority granted to you under the Energy Act of 2005.

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

80050-002
(cont.)

80050-001

80050-002

From: ocsenergywebmaster@anl.gov
To: mail_ocsenergyarchives
Subject: OCS Alternative Energy and Alternate Use Programmatic EIS Comment 80051
Date: Thursday, May 17, 2007 12:57:41 PM
Attachments: fish-oil_80051.doc

Thank you for your comment, Mary Luketich.

The comment tracking number that has been assigned to your comment is 80051. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: May 17, 2007 12:58:54PM CDT

OCS Alternative Energy and Alternate Use Programmatic EIS
Draft Comment: 80051

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Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\mluketich\Desktop\fish-oil.doc

Questions about submitting comments over the Web? Contact us at: ocsenergywebmaster@anl.gov or call the OCS Alternative Energy and Alternate Use Programmatic EIS Webmaster at (630)252-6182.

June 6, 2007

Dear Mr. Chris Oynes:

Thank you for the opportunity to comment on your draft Programmatic Environmental Impact Statement.

I am concerned that MMS plans to allow energy companies to abandon unused oil platforms instead of requiring companies to remove them as mandated by federal law. MMS should not allow energy companies to avoid paying the costs of removing their rigs, estimated to be \$9.9 billion from 1985-2020, when nothing in the 2005 Energy Act gives MMS such new authority.

I also am concerned that MMS plans to establish a program to permit industrial fish farming in federal waters even though Congress has not specifically authorized this activity. This would exceed MMS's mandate and capacity, which is clear given that the draft PEIS does not adequately address the ecological, human health, and economic impacts of fish farming. Specifically, fish farms anchored off oil rigs may:

- Cause long-term contamination of the marine environment due to the abandoned oil rigs.
- Threaten the environment and consumers because of the connection between oil and gas rigs and elevated mercury levels in surrounding sediments and fish.
- Harm consumers by using chemicals, antibiotics, and hormones to raise fish in crowded conditions.
- Harm the marine environment through transmission of disease and parasites to wild fish populations.
- Deplete wild fish populations because farmed finfish require wild fish for feed.
- Harm marine ecosystems when non-native or genetically distinct farmed fish escape and interact with wild fish populations.

I respectfully request that you consider these factors and do not exceed the authority granted to you under the Energy Act of 2005.

Please do not allow energy companies to abandon unused oil platforms.

Please do not allow industrial fish farming in federal waters.

This harms all of us and future generations.

80051-001

80051-002