



March 15, 2010

Diana Pietri
Ocean Science Trust
1330 Broadway, Suite 1135
Oakland, CA 94612

Re: Oil and Gas Platform Decommissioning Alternatives Report

Dear Diana Pietri:

On behalf of the Environmental Defense Center (EDC), we write to submit a formal request regarding completion and release of the Oil and Gas Platform Decommissioning Alternatives Report (OGPDAR) and Model. It is our hope that by highlighting our recommendations and concerns before the draft report and model is released to the public, the Ocean Science Trust (OST) will have a chance to address these concerns.

EDC is a non-profit, public interest law firm that has worked to protect and restore California's environment and natural resources for more than 30 years. EDC's work focuses primarily within San Luis Obispo, Santa Barbara, and Ventura Counties, including the northern Channel Islands and the ocean waters seaward of this region's shores. Our mission is to protect and enhance the local environment through education, advocacy, and legal action. Program areas include protecting coast and ocean resources, open spaces and wildlife, and human and environmental health.

The EDC has a long history of working on the issue of oil and gas platform decommissioning. Our service area contains a substantial proportion of the existing oil and platforms, as Ventura and Santa Barbara Counties host 20 of the 27 existing oil platforms. In 1996 we were directly involved with platform removal when Chevron decommissioned four platforms offshore Summerland, in Southern Santa Barbara County. We continue to seek cleanup of the sites where the platforms were removed.

Since 1996, we have also responded to three separate proposed bills that would change state law to establish a “rigs-to-reefs” program.

Our requests are discussed in detail below and include the following:

- **A Draft OGP DAR should be released for public review, and a public meeting should be convened where agencies, the public, and other non-profit organizations can comment on the report.**
- **Comments from the Oil and Platform Decommissioning Expert Advisory Committee should accompany the Draft OGP DAR, along with an explanation of how these comments were incorporated into the report.**
- **All model inputs and assumptions should be explicitly expressed in the report.**

Draft Oil and Platform Decommissioning Report

We request that the OST release the draft OGP DAR and hold a public meeting in Santa Barbara. As the OGP DAR document will be used to inform the California Natural Resource Agency, a public agency, on the important issue of platform decommissioning, we feel it is imperative that all stakeholders including agencies, the public, and other non-profit organizations have an opportunity to comment on the draft report. In addition, as discussed above, the counties of Ventura and Santa Barbara host 20 of the 27 existing oil platforms, with most of the platforms occurring offshore Santa Barbara County. Therefore, any decisions made regarding oil platform decommissioning will have a local and immediate impact within these communities. To ensure community concerns are addressed we recommend releasing a draft report, holding a public meeting, and providing an opportunity for a broader range of stakeholders to comment on the OGP DAR report.

Expert Advisory Committee Comments

To provide for greater transparency and communication between all stakeholders we recommend that the Expert Advisory Committee comments be released publically, including an explanation of how comments were incorporated into the draft OGP DAR. Releasing the Advisory Committee comments is essential for relaying information on how expert opinion on scientific, political, and legal issues have been incorporated into the report. These comments will both inform the public and enhance the understanding of managers and decision makers. In addition, this should allow for a more transparent process that will further OST’s mission to “encourage coordinated, multi-agency, multi-institution approaches to translating and applying ocean science to management and policy.”¹

¹ California Ocean Science Trust Annual Report October 2, 2008 through September 30, 2009.
http://www.calost.org/OST_Annual_Report_08-09.pdf (Accessed March 5, 2010)

Explicitly Express All Model Inputs

EDC participated in the October 22, 2009, webinar public briefing. While not all information was easy to follow due to lack of visual aids, it was made very clear that certain model inputs would be manipulated by a “user.” During the webinar it was unclear as to whom the “user” would be. It was also evident that the model will be an important tool used to evaluate decommissioning options. Because it is unclear to us who will manipulate the model, we recommend that all model inputs and assumptions be explicitly expressed in the draft OGP DAR. This will facilitate a better understanding of what information and inputs were entered into the model, how model inputs were weighted, and what assumptions model inputs and outputs are based on.

Conclusion

In conclusion, we would like to see the integration of science and public participation to inform California coastal ocean policy and decision-making on the issue of oil and gas platform decommissioning. A public meeting should be held where all stakeholders can review and comment on the draft OGP DAR, comments and suggestions by the Expert Advisory Committee and how they were incorporated into the draft, as well as model inputs and outputs. As the discussion surrounding oil and platform decommissioning moves forward, we would like to work in coordination with the OST, the Expert Advisory Committee, the consultant, and other stakeholders to ensure that the best available science is used and the public has an opportunity to participate in this important policy issue.

Thank you for your consideration of these comments.

Sincerely,



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