



*Protecting and Restoring the Santa Barbara Channel and Its Watersheds*

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July 23, 2010

Ocean Protection Council  
1330 Broadway, 13<sup>th</sup> Floor  
Oakland, CA 94612-2530

Re: “Evaluating Alternatives for Decommissioning California’s Offshore Oil and Gas Platforms” Report

Dear Council members:

Please accept the following comments on the “Evaluating Alternatives for Decommissioning California’s Offshore Oil and Gas Platforms” Report, which are hereby submitted by Santa Barbara Channelkeeper. Santa Barbara Channelkeeper is a non-profit environmental organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds, and we are concerned about the environmental impacts associated with offshore oil rigs in the Santa Barbara Channel as well as with the various options for decommissioning them once production at the rigs ceases.

As we and many others stated at your June 25, 2010 meeting on this report, Channelkeeper is concerned about the report’s numerous data gaps, as well as the failure of your council to solicit public comment before declaring it a “final” report. The timing of this report’s release is such that it is being looked to as a definitive source of information by decision-makers as they consider pending legislation to establish a rigs to reefs program in California. Unfortunately, the report is far from definitive and in fact leaves many important questions regarding the relative costs and benefits, environmental impacts, safety and liability of the various decommissioning options unanswered.

One of the most significant data gaps is, in our opinion, the shortage of scientific evidence that rigs serve as habitat and actually produce fish rather than simply attracting them away from natural reefs. This is one of many gaps in information that should be addressed before the report can be declared final and relied upon by decision-makers as a key tool to inform important policy decisions.

Santa Barbara Channelkeeper therefore recommends that the OPC solicit public comment on the report before declaring it a final report, and direct the Ocean Science Trust to address the many data gaps related to relative costs and benefits, environmental impacts and safety, liability and management questions. Thank you for your consideration of these comments.

Sincerely,

*//ss// Kira Redmond*

Kira Redmond  
Executive Director