

After review of the OPC Decommissioning Report, we have concerns regarding the exclusion of recent research on San Pedro Shelf and Santa Barbara Channel oil platforms. We believe that the report severely underestimates the ecological significance of oil platforms from the surface to the seafloor. The report fails to consider available movement data of platform-associated species, which would indicate that levels of biomass and productivity may actually be significantly higher than those reported. The report heavily focuses on mid-water and bottom species, but data for assemblages occurring in the upper water column (<85') are largely ignored in the analysis. Exclusion of said data fully excludes the alternative of complete retention of platforms. In addition, it is reported and well documented in the scientific literature that natural hard bottom substratum is a limited habitat in the Southern CA Bight. However, recent movement data has demonstrated that depth-specific horizontal levels function as seafloor habitat for many nearshore reef species occurring in the upper 85'. Furthermore, there are available data indicating that mussel-based invertebrate communities reside in the upper 85'. A forthcoming peer-reviewed study has demonstrated that this mussel community is essential for residential platform-associated fishes. Thank you for the opportunity to provide comments.