

July 23, 2010

The Honorable Lester A. Snow
Secretary for Natural Resources
State of California
1330 Broadway, 13th floor
Oakland, CA 94612

RE: Comments on Oil Platform Decommissioning Study

Dear Secretary Snow:

We commend the tremendous effort that went into producing the oil and gas decommissioning study, *Evaluating Alternatives for Decommissioning California's Offshore Oil and Gas Platforms*. This report will undoubtedly provide a useful synthesis of information for decision makers and the public; however, it does not fully explore the use of several federal platforms for wind generation. In addition, while oil platforms may appear to benefit certain species and recreational stakeholders, decisions on decommissioning must also take into account the fact that there is no evidence that platforms provide net ecological benefits to the marine ecosystem as a whole relative to areas left in their natural state.

The report, and future decisions regarding decommissioning options, would have benefited from examining in greater detail using the four federal platforms (Harvest, Hermosa, Hidalgo, and Irene) for wind generation units. These units are in areas of high relative wind speed, and placement of one 5 MW wind generator on each of these platforms would provide 20 MW generating capacity. Even though platforms are not necessary for offshore wind generators, the use of existing platforms could offer significant cost savings compared to placing wind generators in new locations. Rather than a myopic focus on whether the four platforms provide sufficient energy to justify the infrastructural costs of connecting to the terrestrial power grid, the report should have considered whether these generators and associated infrastructure might act as a nucleus reducing the cost threshold for placement of additional offshore wind generators. This could act as a pilot project encouraging the development of an offshore grid, which would then reduce the cost of expansion. Unfortunately, the report did not consider using the platforms for wind generation in the context of its potential to open the door for expansion of wind energy as part of California's renewable energy portfolio.

Furthermore, we realize the scope of the report was only to evaluate decommissioning options for existing platforms, not an evaluation of whether platforms are more ecologically beneficial than habitats left in their natural state. To this end, the report does not consider the impacts of installing oil platforms, the risk of oil spills throughout the life of a platform, the toxic substances and pollutants released by the platforms, or the modifications in natural habitat functions as a result of the platforms. Due to the limited scope of the report, it is important to recognize that any conclusion that partial removal is preferable to complete removal does not imply that the placement of oil rigs in the ocean offers net ecological benefits.

Again, the report is a useful synthesis of information, and we look forward to working together on this important issue.

Sincerely,

A handwritten signature in blue ink, reading "Geoffrey Shester", is displayed on a light blue rectangular background.

Geoffrey G. Shester, Ph.D.
California Program Director