



October 21, 2022

Kevin M. Sligh, Sr., Director
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Washington, D.C. 20240

Amanda Lefton, Director
Richard Yarde, Regional Supervisor
Bureau of Ocean Energy Management
Pacific OCS Region
760 Paseo Camarillo Suite 102
Camarillo, CA 93010-6002
Submitted via email: Richard.yarde@boem.gov

Re: Draft Programmatic Environmental Impact Statement for Oil and Gas Decommissioning Activities on the Pacific Outer Continental Shelf – Request for 90-Day Public Comment Period

Dear Mr. Yarde:

The undersigned organizations respectfully request that the deadline to comment on the Draft Programmatic Environmental Impact Statement for Oil and Gas Decommissioning Activities on the Pacific Outer Continental Shelf (“DPEIS”) be extended to January 12, 2023, in order to provide a 90-day public review and comment period.¹

¹ The website for the DPEIS states that the deadline to comment is November 30, 2022, which is inconsistent with the deadline set forth in the Federal Register Notice, which is November 28, 2022. We calculated 90 days from November 28, 2022.

The DPEIS is a critically important report that will affect the future decommissioning of all twenty-three platforms in federal waters offshore California. The report presents the culmination of years of work in response to the public’s request for a comprehensive, cumulative analysis of the potential decommissioning options, impacts, and mitigation strategies. The DPEIS, including appendices, contains 664 pages of technical and scientific information.² We appreciate the time the agency has devoted to this effort, and we believe the public deserves adequate time to review and comment on the report.

As you may know, there is tremendous public interest in this matter. The platforms in question stretch from Orange County through Santa Barbara County. Platform decommissioning has been a State-wide issue of interest ever since 1998, when the first “rigs-to-reefs” bill was proposed. That State Legislature eventually passed legislation in 2010, noting the importance of platform decommissioning offshore California, and requiring an extensive, objective scientific analysis of decommissioning options, impacts, and benefits. This DPEIS will likely help inform that analysis. Accordingly, the public must be afforded adequate time to review and comment on this environmental review.

We appreciate your attention to this request and look forward to providing constructive comment on the DPEIS. Thank you for your consideration.

Sincerely,

Linda Krop, Chief Counsel
Environmental Defense Center

Irene Gutierrez, Senior Attorney
Natural Resources Defense Council

Pete Stauffer, Ocean Protection Manager
Surfrider Foundation

Michael Lyons, President
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Michael Stocker, Director
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Aaron McCall, Federal Advocacy Coordinator
California Environmental Voters

Garry Brown, Executive Director, Founder
Orange County Coastkeeper
Inland Empire Waterkeeper

² Please note that the webpage link to Appendix B is not functional.