December 23, 2013

California Coastal Commission
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San Francisco, CA 94105-2219

U.S. Department of the Interior
Bureau of Ocean Energy Mgmt.
Pacific Region
770 Paseo Camarillo, Second Floor
Camarillo, CA 93010

U.S. Department of the Interior
Bureau of Safety and Environmental Enforcement
Pacific Region
770 Paseo Camarillo, Second Floor
Camarillo, CA 93010

U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: Offshore Hydraulic Fracturing and Other Well Stimulation

Dear California Coastal Commission, U.S. Department of the Interior, and U.S. Environmental Protection Agency:

On behalf of the Environmental Defense Center (EDC), Carpinteria Valley Association, Citizens for Responsible Gas, Get Oil Out!, Los Padres Sierra Club, Santa Barbara County Action Network, and Surfrider Foundation we write to respectfully urge that your agencies take immediate action to address the use of hydraulic fracturing, acidization, and other well stimulation techniques in oil and gas operations offshore California. Among other actions, we recommend that your agencies cooperate to institute a moratorium on the offshore use of these techniques, unless and until such use can be proven safe. While each of your agencies can and should take individual actions to meet its respective specific legal obligations, we believe that a collective and coordinated effort will best ensure the strong protection of our irreplaceable coastal resources.

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Founded in response to the 1969 Santa Barbara oil spill, EDC provides legal services to other non-profit environmental organizations within Ventura, Santa Barbara, and San Luis Counties. Protecting our coastal environment and communities from the risks and impacts of offshore drilling has been integral to EDC's work since our founding. Continuing this legacy, EDC was the first organization to uncover the use of fracking offshore California in 2011, and earlier this year we issued the first comprehensive report and series of policy recommendations addressing the issue, DIRTY WATER: FRACKING OFFSHORE CALIFORNIA.[1]

The following letter builds upon the extensive research and analysis conducted in the course of preparing the DIRTY WATER report, and provides further detail regarding the policy recommendations contained within that report, particularly as they relate to legal compliance with the Coastal Zone Management Act (CZMA) and Clean Water Act (CWA).[2]

BACKGROUND

A. COASTAL ZONE MANAGEMENT ACT: FEDERAL CONSISTENCY AND THE CALIFORNIA OUTER CONTINENTAL SHELF

The CZMA was enacted in 1972 in order to provide comprehensive, coordinated planning for the protection and beneficial uses of the "coastal zone," defined to include land near the shorelines of coastal states, as well as coastal waters extending seaward to the limits of the United States territorial sea.[3] The territorial sea for coastal states bordering the Atlantic and Pacific Oceans extends three geographical miles seaward from the coastline, while submerged federal lands that lie beyond this 3-mile limit constitute the "outer continental shelf" (OCS).[4] The CZMA closely interacts with the Outer Continental Shelf Lands Act

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[1] The DIRTY WATER report is available at:
www.edcnet.org/learn/current_cases/fracking/offshore_fracking_report_2013.pdf

[2] All of the offshore oil platforms within EDC's tri-county service area (Ventura, Santa Barbara, and San Luis Obispo Counties) are within federal OCS waters, with the exception of Platform Holly, located in state waters near the U.C. Santa Barbara campus. This letter accordingly focuses on the federal consistency process under the CZMA as well as compliance with the federal CWA. EDC urges the Coastal Commission to require a coastal development permit, pursuant to the Coastal Act, Pub. Res. Code § 30106, for any fracking, acidization, or other well stimulation proposed at Platform Holly.

[3] 16 U.S.C. §§ 1451, 1452, 1453(1)

[4] 42 U.S.C. §§ 1302, 1311

(OCSLA), which among things establishes detailed processes and requirements for federal oil and gas leasing and permitting activities in the OCS.[5]

In passing the CZMA, Congress found that the "increasing and competing demands upon the lands and waters of our coastal zone" had "resulted in the loss of living marine resources, wildlife, nutrient-rich areas, permanent and adverse changes to ecological systems, decreasing open space for public use, and shoreline erosion."[6] Accordingly, it placed particular emphasis on the objective of preserving coastal natural resources "for this and succeeding generations."[7]

One of the CZMA's fundamental mechanisms to achieve this overarching objective was to provide coastal states with oversight over activities in federal waters where those states have adopted a Coastal Management Program (CMP) to manage coastal land and water uses. The CMP's purpose is to encourage coastal states to manage their coastal resources in accordance with specific national priorities, including protection of natural resources and water quality.[8] In coastal states with federally approved CMPs, federal government actions (including permitting or licensing) proposed in federal waters are subject to state oversight prior to approval.

This oversight process, known as "consistency review," is a "unique federal-state coordinated regulatory process . . ., which grants coastal states which elect to participate in the CZMA program the ability to regulate federal activities that affect their coastal zone."[9] The "federal consistency program is a cornerstone of the CZMA program and a primary incentive for State's participation."[10] The National Oceanic and Atmospheric Administration (NOAA) certified the California CMP in 1978.

1. Consistency Review of OCS License and Permit Activities

Congress specifically extended the consistency requirement to OCS exploration plans (EPs) and development and production plans (DPPs) (collectively, OCS Plans), stating that such plans "shall be consistent with the federally approved CMP in order for those plans to be approved."[11] Accordingly,

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[5] 43 U.S.C. §§ 1331-1356
[6] 16 U.S.C. § 1451(c)
[7] 16 U.S.C. § 1452(1)
[8] 16 U.S.C. § 1452
[9] *CZMA Federal Consistency Regulations Final Rule*, 71 Fed. Reg. 75,864
[10] *Id.*; *California v. Norton*, 150 F. Supp. 2d 1046 (N.D. Cal. 2001), *aff'd* 311 F.3d 1162 (9th Cir. 2002)
[11] 16 U.S.C. § 1456(c)(3)(B)

federal consistency regulations include a subpart specific to OCS "exploration, development and production activities."[12]

OCS plans are of critical importance to fulfilling the CZMA consistency mandate in relation to OCS oil and gas activities, as they represent the final stages of OCSLA's four-stage leasing process. In addition to OCS plans, OCS Federal license or permit activities—including applications for permits to drill (APDs) and application for permits to modify (APMs)—will be subject to further consistency review when they represent a "major amendment" to the previously reviewed OCS plan.[13]

The regulatory definition of "major amendment" varies, depending on whether or not the license or permit activity has been previously reviewed in an OCS plan consistency review.

In circumstances where the amendment pertains to a federal license or permit activity that **has not been previously reviewed** by the Coastal Commission, federal regulations define "major amendment" simply as any subsequent federal approval that will cause **any effect** on any coastal use or resource.[14]

In circumstances where the amendment pertains to a federal license or permit activity that **has been previously reviewed** by the Commission, federal regulations define "major amendment" as a subsequent federal approval that will cause an effect on any coastal use or resource **substantially different** from those originally reviewed by the state agency.[15] The determination of "substantially different" coastal effects must be "made on a case-by-case basis" by the federal agency after consulting with the state agency and applicant. In making its determination, the federal agency "shall give considerable weight to the opinion of the state agency."[16]

In sum, where an APD or APM would authorize activity that has not been previously reviewed by the Coastal Commission, such activity will be considered a "major amendment" if it has **any** coastal effect. In circumstances where the

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[12] 15 C.F.R. Part 930, Subpart E, §§ 930.70-930.85
[13] 15 C.F.R. § 930.51(a)-(b); *CZMA Federal Consistency Regulations Final Rule*, 65 Fed. Reg. 77,124, at 77,144 (Dec. 8, 2000) ("OCS related federal license or permits not described in detail in OCS plans are subject to [the overriding consistency regulations] at subpart D.")
[14] 15 C.F.R. § 930.51(b)(1) (emphasis added)
[15] 15 C.F.R. §§ 930.51(b)(3), (c)
[16] 15 C.F.R. § 930.51(e)

Coastal Commission has previously reviewed the activity, it must also meet the "substantially different" coastal effect standard to be considered a "major amendment." The Department of the Interior (DOI), however, can only make this determination after consulting with the Coastal Commission.

Accordingly, **any DOI federal license or permitting decision requiring any modification of a previous OCS plan requires coordination with the Coastal Commission to determine whether that modification constitutes a "major amendment" to the OCS plan. The regulations do not allow DOI to make this determination unilaterally.** This close coordination best serves the overall objective of the CZMA to foster cooperative federalism by providing states with the right of consistency review, as well as specific CZMA regulatory direction that "the terms 'major amendment,' 'renewals' and 'substantially different' **shall be construed broadly to ensure that the state agency has the opportunity to review activities and coastal effects not previously reviewed.**"[17]

2. APDs or APMs for Hydraulic Fracturing, Acidization, and Other Well Stimulation Techniques Are "Major Amendments" to Existing OCS Plans, Thus Triggering Consistency Review

As EDC detailed in the DIRTY WATER report, records we received through the federal Freedom of Information Act reflect that at least 15 instances of fracking have been conducted off California's shores. Most recent offshore fracking documented in these records has been conducted from Platforms Gilda and Gail, located in the Santa Clara Unit off the Ventura County coast. In addition, it appears that acidizing is commonly utilized from offshore OCS platforms located in the Santa Barbara Channel.

As discussed at the Coastal Commission's August 2013 monthly meeting, held in Santa Cruz, the Commission and its staff were until recently unaware of this practice. This significant gap in knowledge is rooted in what appears to be a routine practice by DOI to characterize APDs and APMs approving fracking and other well stimulation techniques as "minor amendments" to existing OCS plans.

The term "minor amendment" is not contained in the CZMA or its implementing regulations. As discussed in detail above, in **all** OCS licensing and permitting decisions involving amendments to existing OCS plans, the regulations at a bare minimum require notification and coordination with the Coastal Commission to determine whether a modification constitutes a "major amendment," but do not provide DOI with the right to unilaterally declare the

[17] 15 C.F.R. § 930.51(e); *California v. Norton*, 311 F.3d at 1178 fn. 8

modification to be a "minor amendment." DOI's reliance on a nonexistent "minor amendment" standard is directly at odds with the regulatory plain language, is undermining the overall integrity of the OCS consistency process offshore California, and should immediately be suspended.

EDC's review of OCS plans currently governing oil and gas production offshore California further underscores the breakdown of the consistency process. To the best of EDC's knowledge, **no** California OCS plans provide **any** discussion or analysis of fracking or acidization. These include the OCS plans for Platforms Gilda and Gail, where most currently known offshore fracs have been conducted.

For example, drilling from Platform Gilda (currently owned by Dos Cuadras Offshore Resources (DCOR)), to access Lease OCS P-0216, is conducted pursuant to an amended plan of development approved on December 6, 1979.[18] The plan was prepared prior to Platform Gilda's installation, and anticipated capacity of 90 wells, including 50 designated for development of the Repotto reservoirs, 30 designated for development of the Monterey reservoir, and 10 designated for development of an adjacent lease, OCS P-0215.[19]

Recently, DOI approved four APDs or APMs involving fracking from Platform Gilda as "minor amendments" to this OCS plan.[20] The OCS plan for Lease OCS P-0216, however, provides no mention, let alone discussion and analysis, of hydraulic fracturing, acidization, or well stimulation techniques.

The Platform Gilda OCS Plan, in fact, appears to be wholly inadequate under current regulations.[21] Under these regulations, DPPs must include detailed categories of information prior to their approval including:

> * Drilling fluid information, including the projected amount, discharge rate, and chemical constituents for each type of drilling fluid;

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[18] A "plan of development" is no longer a recognized form of OCS plan under OCSLA regulations, which are instead limited to EPs and DPPs (as well as development operations coordination documents, which are only utilized in the Gulf of Mexico). 30 C.F.R. § 550.202

[19] Amended Plan of Development. Lease OCS P-0216, Santa Clara Unit. Union Oil Company (Nov. 30, 1979)

[20] Categorical Exclusion Reviews (CERs) for Platform Gilda, Wells S-005, S-075, S-071, and S-033.

[21] *See* 30 CFR §§ 550.200 et al (EP, DPP criteria); §550.280 *et al.* (post-approval requirements for the EP, DPP)

> * Chemical products information including names and description, quantities to be stored, and rates of usage;
>
> * New or unusual technology information, defined to include equipment or procedures that have not been used previously or extensively in a BOEM OCS Region.[22]

The Platform Gilda OCS Plan contains none of these basic categories of information.

While these deficiencies are significant, Platform Gilda is one of only 13 California OCS platforms that have undergone **any** consistency review by the Coastal Commission.[23] The remaining 10 offshore platforms (constituting approximately 43% of existing platforms located in federal waters offshore California) are operating under OCS plans that were developed prior to promulgation of federal CZMA regulations implementing consistency requirements (and are at least 35 years old), and thus have never been reviewed by the Coastal Commission.[24] It is unknown whether DOI has also been approving fracking and other well stimulation techniques as "minor amendments" to these unreviewed OCS plans. Since these platforms were never subject to consistency review, any activity involving fracking, acidization or other well stimulation techniques must be considered a "major amendment."

B. Clean Water Act: OCS Platform NPDES Permit

Congress enacted the Federal Water Pollution Control Act, more commonly referred to as the CWA, in order to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters."[25] The CWA prohibits the discharge of any pollutant into U.S. waters without a National Pollution Discharge Elimination System (NPDES) permit.[26] NPDES permits must include, at a minimum, three primary provisions: 1) technology-based effluent limitations; 2) any more stringent limitations necessary to meet water quality standards; and 3) monitoring and reporting requirements.[27]

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[22] 30 C.F.R. §§ 550.241-.262; 550.243; 550.213(d)
[23] Platforms with OCS plans that have undergone consistency review: Edith, Eureka, Gail, Gilda, Gina, Grace, Habitat, Harmony, Harvest, Heritage, Hermosa, Hidalgo, Irene
[24] Platforms with OCS plans that have not undergone consistency review: A, B, C, Hillhouse, Houchin, Henry, Hondo
[25] 33 U.S.C. § 1251(a)(2)
[26] 33 U.S.C. § 1311(a)
[27] 33 U.S.C. §§ 1342, 1311, 1318

Since 1984, discharges from the California OCS offshore platforms have been regulated under a "general" NPDES permit. Approximately half the offshore platforms in the California OCS discharge their wastewater directly to the ocean, while the other half inject the pollution underneath the seabed.[28]

The permit addresses 22 categories of discharges from the OCS platforms, including drilling fluids, drill cuttings, produced water, and well treatment fluids.[29] For each of these categories, the permit places limits on the concentration of various pollutants that may be present in said discharges, and establishes monitoring and reporting requirements.[30]

In spring 2013, the California Coastal Commission unanimously found EPA's most recent proposed revision of the OCS General Permit consistent with the state's CMP pursuant to the CZMA.[31] At that time, however, DOI and EPA staff were largely unaware that offshore fracking was being conducted.

The failure to consider fracking and other well stimulation techniques leaves a significant gap in the CWA permit coverage and CZMA consistency process. According to one recent study, more than 2,500 "hydraulic fracturing products" have been identified in frac fluids,[32] 650 of which contain chemicals that are known human carcinogens, hazardous air pollutants, or have been otherwise identified as risks to human health, including benzene, toluene, and methanol.[33] EPA has apparently never considered the potential presence of these chemical pollutants in relation to the OCS NPDES permit; nor were these chemical discharges disclosed to or reasonably anticipated by EPA during the permitting process.[34] In light of the significant risks fracking wastewater poses to the environment, the EPA and Coastal Commission should ensure that further consistency review is conducted prior to finalization of the permit revision.

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[28] California Coastal Commission Staff Report: CONSISTENCY DETERMINATION FOR U.S. EPA ISSUANCE OF CLEAN WATER ACT GENERAL NATIONAL POLLUTION DISCHARGE ELIMINATION SYSTEM PERMIT CAG280000 FOR DISCHARGES FROM OFFSHORE OIL AND GAS PLATFORMS LOCATED IN FEDERAL WATERS OFF THE COAST OF SOUTHERN CALIFORNIA, at p. 2, 6 (June 12, 2013) (*Available at* http://documents.coastal.ca.gov/reports/2013/6/W13a-6-2013.pdf).
[29] *Id.* at p. 2, 6
[30] *Id.*
[31] *Id.* at 1
[32] U.S. HOUSE OF REPRESENTATIVES COMMITTEE ON ENERGY AND COMMERCE MINORITY STAFF, CHEMICALS USED IN HYDRAULIC FRACTURING 1 (2011)
[33] *Id.* at Exhibit 2, at 19–20
[34] *See Piney Run Preservation Ass'n v. County Commissioners of Carroll County*, 268 F.3d 255 (4th Cir. 2001)

RECOMMENDATIONS FOR AGENCY ACTION

A. RECOMMENDATIONS FOR COLLECTIVE AGENCY ACTION

Based on the foregoing discussion, EDC respectfully requests that the Coastal Commission, DOI, and EPA collectively take the following actions.

1. Broadly Investigate the Use of All Forms of Well Stimulation

The Coastal Commission, DOI, and EPA should broadly investigate the use of all well stimulation techniques offshore California, not just hydraulic fracturing. As EDC detailed in our DIRTY WATER report, acidization has been commonly utilized in the OCS, as well as fracking techniques that differ in some respects from those utilized on land. According to industry estimates, approximately 30 emerging technologies and techniques are now enabling production of more oil and gas from shale and other "tight" sources.[35] It is thus imperative that your agencies conduct a comprehensive of **all** well stimulation techniques currently being utilized in order to be able to accurately assess the impacts and potential risk of those techniques.

2. Institute a Collective Moratorium on Offshore Well Stimulation

The two primary federal laws addressed in this letter—the CZMA and CWA—are built upon principles of cooperative federalism. These principles have not been met in relation to offshore fracking. None of your agencies was aware that fracking was being utilized until recently, and the impacts and potential risks from its use offshore have never been adequately studied and analyzed. Fracking, acidization, and other forms of well stimulation offshore should be prohibited unless and until their use can be proven safe. Until that time, your agencies should collectively place a moratorium on the current use or future approval of new proposals.

B. RECOMMENDATIONS FOR CALIFORNIA COASTAL COMMISSION ACTION

Based on the foregoing discussion, EDC respectfully requests that the Coastal Commission take the following actions.

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[35] Collin Eaton, *Shale well depletion raises questions over U.S. oil boom.* FUEL FIX (December 17, 2013)

1. Conduct a Comprehensive Consistency Review of OCS Plans for all Platforms

The recent disclosures that DOI has approved APDs and/or APMs involving fracking as "minor amendments" to existing OCS plans have revealed the need for a comprehensive review of DOI's management and oversight of OCS activity offshore California. The fact that the Commission and its staff were completely unaware of the use of fracking for nearly two decades demonstrates a fundamental breakdown in CZMA consistency review in relation to OCS activities.

This significant gap undermines the broader goals of the CZMA to ensure coastal states with a right of review and uphold coastal management program policies. Accordingly, EDC recommends that the Commission direct its staff, in cooperation with DOI, EPA, and other appropriate agencies, to conduct a comprehensive, case-by-case review of OCS plans for all offshore oil platforms. Given the outdated nature of OCS plans EDC has reviewed thus far, it is likely that many OCS plans will need to be revised to reflect current operations, and that such revisions will require updated consistency analyses. For the platforms that have never undergone consistency analysis, the Commission should demand that such analysis be conducted.[36] All use of such techniques should be suspended until the CCC consistency review is conducted.

2. Notify DOI that APDs and/or APMs involving fracking, acidization, or other forms of well stimulation are not consistent with OCS Plans or the California CMP (15 C.F.R. §§ 930.65, 930.85)

Federal consistency regulations provide at least two potential avenues of pursuit for the Coastal Commission in relation to DOI's approval of well stimulation pursuant to APMs and APDs.

Under 15 C.F.R. § 930.85, the Commission can submit a claim to DOI that its approvals of APDs and/or APMs involving fracking, acidization, or other forms of well stimulation fail to substantially comply with approved OCS plans, as well as a request for appropriate remedial action. As described above, DOI appears to

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[36] Prior actions of the Commission provide precedent for this recommended action. See May 25, 1999 CALIFORNIA OIL AND GAS LEASING AND DEVELOPMENT STATUS REPORT, at p. 28 (recommending "case-by-case review of past Coastal Commission consistency actions and compare that action with the lessees' proposed activities . . . to determine if a new consistency review will be required.")

routinely approve APDs and/or APMs without consistency determinations by ostensibly characterizing them as "minor amendments" to OCS plans, despite the fact that these OCS plans are outdated and provide no mention of fracking. In other instances, such approvals are being made despite the fact that the underlying OCS plan has never undergone consistency review. EDC thus recommends that the Commission submit a §930.85 claim, and request that DOI remedy the inconsistency by requiring consistency review of all pending and future APDs and/or APM's involving offshore well stimulation.

In addition to this regulatory direction specific to OCS plans, federal consistency regulations at 15 C.F.R. § 930.65 also contain a general provision providing the Commission with the right to notify DOI that it has determined that DOI is approving federal license or permit activity that is having effects "substantially different" than described in previous consistency determinations for OCS plans.[37] EDC thus recommends that, in the alternative, the Commission submit a §930.65 claim.

3. Request that EPA Resubmit the Proposed Revised CWA NPDES Permit for Supplemental Consistency Analysis

As discussed in detail previously, the Coastal Commission issued its consistency determination for the EPA's revised NPDES General Permit governing water pollutant discharges from OCS Platforms in April 2013. At this time, the Coastal Commission, its staff, and EPA appear to have been largely if not completely unaware that hydraulic fracturing and other forms of well stimulation were being utilized offshore California. The Commission should request that EPA resubmit this consistency determination to address pollutants that may be contained within frac flowback and other well stimulation fluids. CZMA implementing regulations provide express authority for supplemental consistency determinations where, such as here, there are "significant new circumstances or information relevant to the proposed activity and the proposed activity's effect on any coastal use or resource."[38]

4. Hold a Coastal Commission Workshop in Winter or Spring 2014

In light of the high public interest in offshore fracking and other well stimulation methods, as well as the marked lack of transparency, EDC recommends that the Commission schedule a public workshop to discuss Coastal Act/CZMA issues that such practices raise. The discussion of such issues in a

[37] 15 C.F.R. § 930.65
[38] 15 C.F.R. § 930.46

public forum could also help to inform any individual consistency certifications on OCS plans that may be necessary.

C. RECOMMENDATIONS FOR DOI ACTION

As discussed in detail above, the CZMA is built upon a structure of cooperative federalism that places responsibility on both federal and state agencies. Accordingly, the affirmative actions taken by the California Coastal Commission should be complemented by affirmative actions to be taken by DOI. Based on the foregoing discussion, EDC respectfully requests DOI take the following actions.[39]

1. Cooperate with California Coastal Commission to Ensure Compliance with CZMA Consistency Requirements

As discussed in detail above, federal consistency regulations provide at least two potential avenues (15 C.F.R. §§ 930.65 and 930.85) for the Coastal Commission to pursue in relation to DOI's approval of offshore fracking and other forms of well stimulation. Both of these regulatory provisions also provide for independent, proactive action by DOI.

Specifically, both § 930.65 and § 930.85 direct that DOI and state agencies "shall cooperate in their efforts to monitor federally licensed or permitted activities . . . to make certain that such activities continue to conform to both federal and state requirements." These provisions in turn help ensure that the overall objectives of the CZMA and its implementing regulations are met. As stated by the regulations, one of those key objectives is to "provide flexible procedures which foster intergovernmental cooperation and minimize duplicative effort and unnecessary delay, while making certain that the objectives of the federal consistency requirements of the Act are satisfied."[40] To best meet its regulatory responsibilities, DOI should:

* Cooperate in partnership with the Coastal Commission in a comprehensive review of all OCS plans governing platforms offshore California

[39] This letter is limited to addressing issues under the cooperative federalism structure of the CZMA and CWA. We will be corresponding separately with DOI regarding issues under other laws including the National Environmental Policy Act, Endangered Species Act, and Marine Mammal Protection Act.
[40] 15 C.F.R. § 930.1(c)

* Initiate consistency review for all OCS plans governing the 10 platforms that have not undergone consistency review

* In accordance with OCSLA regulations, cease the utilization of "minor amendments" to OCS plans

* Ensure consistency review is conducted for all APDs and/or APM's involving fracking, acidization, or other form of well stimulation, regardless of whether OCS plans governing the platform have undergone consistency review

CONCLUSION

Thank you for your consideration of our letter and recommendations. We look forward to working with all of your agencies to protect our precious and irreplaceable coastal resources. Please do not hesitate to contact me should you have any questions or wish to discuss any aspect of this letter in more detail.

Sincerely,

Brian Segee
Staff Attorney
Environmental Defense Center

also on behalf of:

Vera Bensen
Board President
Carpinteria Valley Association

John Brooks
President
Citizens for Responsible Oil and Gas

Carla Frisk
Board Member

Get Oil Out!

Gerry Ching
Chair
Los Padres Sierra Club

Kenneth Hough
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