



## OREGON SALMON COMMISSION

September 8, 2008

Minerals Management Service  
U.S. Department of the Interior

RIN: 1010-AD30

Docket ID: MMS-2008-OMM-0012

Alternative Energy and Alternate Uses of Existing Facilities on the Outer Continental Shelf;  
Proposed Rule

The following comments of the Oregon Salmon Commission, a state commodity commission under the Oregon Department of Agriculture representing approximately 1,175 Oregon ocean salmon troll fishermen, are in response to the notice of proposed rulemaking published by the Minerals Management Service in the Federal Register on July 9, 2008.

**Stakeholder Involvement:** Early engagement of stakeholders, especially existing users, is critical. Since the development of ocean wave energy has the potential to seriously damage the environment and fisheries, consultation with local resources can help facilitate siting in areas that maximize efficiencies and minimize damage to the environment and to the fisheries.

Oregon projects have been initiated and have shown the importance of stakeholder involvement to achieve collaboration between stakeholders and developers. This strong working relationship and collaboration is an important component and needs to be specifically provided for in the MMS rule. This consultation should occur before a site is identified in a request for a commercial lease or a request for interest in a site.

We recommend that MMS develop language requiring coordination between developers and stakeholders. This should be a precursor to development of a site assessment plan (SAP).

We also recommend that MMS adopt the use of a settlement agreement type process, like that used by FERC, to ensure an opportunity for early stakeholder involvement, compatibility with state Territorial Sea Plans, and other regulatory programs.

**Consistency with Territorial Sea Plans:** MMS should consider the spatial allocation of ocean uses prescribed in state Territorial Sea Plans in the selection of areas to be considered for lease sale. This will allow developers to efficiently focus resources on areas that are appropriate for development and assure existing users that certain areas are protected.

Thank you for the opportunity to provide comments.

A handwritten signature in black ink that reads "Nancy Fitzpatrick". The signature is written in a cursive, flowing style.

Nancy Fitzpatrick, Administrator  
Oregon Salmon Commission