

August 25, 2003

The Honorable Donald L. Evans
Secretary of Commerce
1401 Constitution Ave., N.W.
Washington, DC 20230

Re: Federal Consistency Review Comments
(Docket no. 030604145-3145-01)

Dear Secretary Evans:

The League of Women Voters of California and the LWV of Santa Barbara, California, have been active in offshore oil and gas issues for many years. Our experience has shown us the importance of state review of federal proposals for consistency with a certified coastal management plan. Review is the prime means of ensuring that state and local interests are appropriately considered in a federal action.

Consequently, we would like to express our opposition to the above referenced proposal which would amend regulations that have already been updated relatively recently to be consistent with the Coastal Zone Act Amendments of 1990. Specific objections include:

- Lease extensions, such as were involved in the recent *California vs. Norton* court case, should not be categorically excluded from consistency review.
- Timelines should not be shortened so as to hinder the ability of state and local agencies as well as the public to give informed input into the decision making process.
- Whether a review is needed when a change to a project is proposed should not be primarily a federal decision; states have the better local knowledge with which to judge whether substantially different coastal effects may be expected.

The League of Women Voters supports the wise management of our nation's natural resources in the public interest. We believe state consistency review is

extremely important for achieving the proper balance between protection of those resources and the production of offshore oil and gas. We urge the National Oceanic and Atmospheric Administration (NOAA) to retract rules changes which would impede a state's ability to conduct such review.

Sincerely,

Jacqueline Jacobberger
President, League of Women Voters
of California

Jean Holmes
Copresident, League of Women Voters
of Santa Barbara