

Subject: CZMA Comments
Date: Thu, 10 Jul 2003 21:10:42 -0500
From: "Robert Rutkowski" <rutkowski@terraworld.net>
Reply-To: "Robert Rutkowski" <rutkowski@terraworld.net>
To: <Elaine.Vaudreuil@noaa.gov>
CC: "Nancy Pelosi" <sf.nancy@mail.house.gov>,"George W. Bush" <president@whitehouse.gov>

David Kaiser
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Dear Mr. Kaiser:

By granting coastal states a say as to whether federal actions violate their own coastal management plans, the CZMA has provided a valuable tool for states and the feds to work through problems concerning competing uses of our nation's coastal Resources.

However, now the oil and gas industry, along with their pals at the Department of the Interior under the leadership of Secretary Norton, wish to change that 30-year tradition. While new consistency rules under the Coastal Zone Management Act were revised as recently as 2000, NOAA is in the process of changing the rules of the game to accommodate industry concerns. The 2000 rulemaking process reflected a cooperative effort between NOAA, other federal agencies, states and stakeholders with no record of problems. Yet at the request of the aforementioned petitioners, NOAA is opening up the consistency rule. In the preliminary round of comments (during the ANPRM), those two parties were the ONLY stakeholders requesting changes to the rule. I believe that as a result of the 2000 rulemaking, new changes are totally unwarranted.

In addition,I believe these changes:

- 1) Are potentially harmful and less protective of coastal resources
- 2) May prompt litigation and will not operate effectively
- 3) Will limit state review
- 4) Will limit public participation

I urge that the Administration save us all time and money by halting the newly proposed rules.

Alternatively, I encourage the Administration to allow the 2000 rulemaking (the result of five years of consultation) sufficient time to work. Thank you for the opportunity to bring these remarks to your attention.

Mindful of the responsibilities which stand before you, I am, Yours sincerely,
Robert E. Rutkowski

cc: Nancy Pelosi
Andrew H. Card, Jr.

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