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August 25, 2003

Via email to CZMAFC.Proposed Rule @noaa.gov

Mr. David Kaiser
Federal Consistency Coordinator, Coastal Programs Division
Office of Ocean and Coastal Resource Management
NOAA
1305 East-West Highway, 11th Floor
Silver Spring, MD 20910

Re: Coastal Zone Management Act Federal Consistency Regulations,
Notice of Proposed Rule, 68 Fed. Reg. 34851 (June 11, 2003)

Dear Mr. Kaiser,

Unocal Corporation ("Unocal") is one of the world's leading independent natural gas and crude oil exploration and production companies. Unocal is directly impacted by the proposed rule because of its extensive oil and gas operations in the Gulf of Mexico, including inland waters, state waters, and on both the Outer Continental Shelf and in deep water areas of the Gulf. Unocal also has a proposed deep water port project in the Gulf of Mexico designed for the receipt of crude oil and delivery to markets located on the Texas and Louisiana Gulf Coast.

Unocal appreciates the efforts of the NOAA to improve the consistency review process. Unocal supports the Congressional intent of the Coastal Zone Management Act of 1972 (the "Act") to create a national program to manage and balance competing uses of and impacts upon coastal resources. Unocal is also interested in the reduction of any uncertainties or ambiguities in how the Act is implemented in the review of energy-related operations, activities and projects in coastal areas. We support:

- Clarification of states' and interest group information needs at the beginning of the consistency review process; and,
- Establishment of clear and realistic deadlines for decision making and appeals (180 days is sufficient).

Given the ongoing need for energy in the nation, the need to enhance our energy security and the increased needs for energy that will result as our economy starts to recover, Unocal believes it is increasingly important that Congress' original intent, as expressed in the Outer Continental Shelf Lands Act, that review for the siting of major energy facilities be expedited. The Department of Commerce and the NOAA have taken some crucial steps in this direction in its proposed rule, but additional changes, as mentioned above, should be considered.

Very truly yours,

Carol J. Westmoreland
Assistant Counsel

cc: Bill Ichord
Steve Gregory
Mike Wilems
Nancy Sauer