

**CITIZENS
CAMPAIGN**
FOR THE ENVIRONMENT



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Protecting the environment and working for a healthy community.

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MMS Renewable Energy and
Alternate Use Programmatic Draft EIS
Argonne National Laboratory
9700 S. Cass Ave.
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To whom it may concern:

Citizens Campaign for the Environment (CCE) is an 80,000-member, non-profit, non-partisan, advocacy organization working to protect public health and the natural environment in New York State and Connecticut. CCE works to build widespread citizen understanding and advocacy for policies and actions designed to manage and protect land and water resources, wildlife and public health.

CCE is very active in promoting policies and actions at the local, state, and federal level that support the development and use of renewable energy, which is derived from sources that are not depleted when used at sustainable levels. Today we face dwindling supplies of traditional energy sources; substantial increases in oil and gas prices, and significant pollutants that have an adverse impact on human health and the environment. Our nation must look towards alternative energy sources to meet our rising energy demand.

CCE, since its inception in 1985, has also been extremely active in working to protect water quality across New York State, Connecticut and throughout the Nation. Currently, CCE actively works on protecting many of New York's largest and often most impacted waterways including the Hudson River, the Long Island South Shore Estuary Reserve, the Great Lakes, the Finger Lakes, the Peconic River, and Long Island Sound. Additionally, CCE is an active member of the Long Island Sound Study Citizens Advisory Committee and the South Shore Estuary Reserve Citizens Advisory Committee.

CCE believes the development of all offshore renewable energy, including but not limited to offshore wind technology, wave technology, and under water current technology, can be an important energy source for America. However, the development of these energies must undergo a site-specific rigorous environmental review process and they must not cause excessive harm to the waterway. The process must be comprehensive and include adequate public participation.

1-CCE generally supports the development of the programmatic EIS. CCE believes the development of an EIS can help to streamline the process of renewable energies off the outer continental shelf. However, ***CCE fully supports that each project undergo a site specific analysis***, which includes characterization of bottomlands, bird monitoring, wave characterization, threatened and endangered species analysis, and migration patterns of wildlife in the surrounding area.

2-CCE opposes a no action alternative. A no action alternative would mean the halt of all renewable energies off the outer continental shelf. Renewable energies represent a home-grown, pollution-free source of energy. CCE believes that steps should be taken to reduce America's dependence on foreign fossil fuels and to use clean, emission-free sources of energy that benefit the quality of our air and water sources.

3-CCE supports a demonstration project for deep-water wind technology. However, ***CCE does not believe that current wind technology should be halted until newer technology is developed.***

4- CCE opposes any "no-public access zone" or any "no fishing zone" surrounding above water or below water projects.

CCE understands both the importance of reducing our dependence on fossil fuels and the significance of protecting our marine environment. Fossil fuel production releases devastating carbon dioxide emissions, which are a major contributor to global climate change. **Global climate change is one of the greatest threats to our world's oceans.** Right now we are seeing sea level rise, the bleaching of coral reefs, greater intensity of hurricanes, high mercury levels in fish and a dramatic increase in the acidity level of our ocean waters. We must find a balance in which our marine environment is protected and our dependence on fossil fuels is reduced. Offshore Renewable Energies has the promise to accomplish both of these critical needs.

Each project should be evaluated on a site-specific basis, with site-specific studies. Each project should follow an open process and include public participation. Each project should undergo a rigorous environmental review process.

Thank you for this opportunity to comment.

Sincerely,

Maureen Dolan Murphy
Program Coordinator