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AD71 Renewable Energy Alternate Uses of Existing Facilities on the Outer Continental Shelf - Acquire a Lease Noncompetitively

Comment On: BOEM-2010-0045-0011

Renewable Energy Alternate Uses of Existing Facilities on Outer Continental Shelf: Acquire Lease Noncompetitively

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Comment from Ben Klein, Georgetown University Law Center

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General Comment

I fully support the proposed change to the rule. It makes sense, streamlines the process, and promotes the ability of people to propose alternative renewable energy projects, something our country sorely needs.

I think the regulation minus the redundancy would still provide far adequate protection and an appropriate level of notice. If someone requests a lease and is the sole requester, the public hears about it, and they may make their case then. Seems to be no need to force the government to do it twice. Look how many months have been needlessly wasted; First in the original rule, which asks for illogical repetition, and now also in the proposed rule change. Fellow commentators, the government is not trying to strip away process, but rather wish to increase speed and efficiency, decrease costs, and want to do it in an open, transparent and accountable way. We should support our government in efforts like this, ESPECIALLY when they are trying to promote good green ecological solutions.

While having an second notice does give an added layer of protection, this minor advantage is far outweighed by the loss in productivity. Also, the second notice isn't meant as added protection, but is a byproduct of an inconsistent rule.

Go forth and make changes, BOEMRE, you have the support of the people!
