

OSAMP Chapter: Introduction
Comment Period: Public
End Date: 10/31/2009

Name	Organization	Section	Comment	Response
C. Tompsett	NUWC DIVNPT	120	Suggest breaking into two sentences. 'Most research has been focused within this study area. When appropriate—such as for marine mammals and sea turtles, marine transportation, and fisheries—the acquisition and review of data has encompassed a wider area, at times even to include the Outer Continental Shelf.	Broke long sentence into two sentences.
C. Tompsett	NUWC DIVNPT	110	Second sentence, replace "including" with "includes"	Replaced "including" with "include".
C. Tompsett	NUWC DIVNPT	140	It would be more useful to the reader if cites to the CZMA were to the U.S. Code rather than sections of the Act; for example, 16 U.S.C. § 1456 rather than Section 307.	Spring 2010
C. Tompsett	NUWC DIVNPT	140	Recommend replacing the first two sentences with the following: "The CRMC is the state authority with oversight of federal consistency (16 U.S.C. § 1456). Federal consistency requires federal agencies to carry out projects that have the potential to affect a use or natural resource of the coastal zone in a manner which is consistent to the maximum extent practicable with the enforceable policies of approved state coastal management programs."	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.
C. Tompsett	NUWC DIVNPT	140	In the last sentence of paragraph 3, replace "statutory" with "regulatory".	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.

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Name	Organization	Section	Comment	Response
C. Tompsett	NUWC DIVNPT	140	This paragraph starts with "More recently, federal regulations have . . ." and then cites Federal Register volume 42; volume 42 would be 1977 which I wouldn't consider "recent", is this the correct cite? If so "subsequently" would seem to be more appropriate	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.
C. Tompsett	NUWC DIVNPT	140	I don't think the reference to Section 305(b)(8) is accurate (Section 305 is Management program development grants and there doesn't	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.
C. Tompsett	NUWC DIVNPT	140	In the first sentence replace "essential" with "essentially"	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.
Charlotte Taylor	RI HPHC	110	"and adaptation of global climate change..." [and adaptation to it]	Changed to "and adaptation to."
Charlotte Taylor	RI HPHC	110	"engaging a well-informed, well represented [do they mean representative?]"	For clarity we kept original sentence structure.
Charlotte Taylor	RI HPHC	110	Adopted - Does this mean the final SAMP? Does adopted have a specific meaning?	"Adoption" refers to both the RICRMC (State) and the NOAA adoption.
Charlotte Taylor	RI HPHC	140	enactment is perhaps a more clear and friendly word	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.
Charlotte Taylor	RI HPHC	140	applicant will [applicant would]	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.
Charlotte Taylor	RI HPHC	140	"SAMP's improve [and clarify?] existing government and community networks..."	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.

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Charlotte Taylor	RI HPHC	110	"the Ocean SAMP (based on the best available science) will serve as a coastal management and regulatory tool to promote..." [otherwise it's science that promotes]	Inserted "based on the best available science."
Don Pryor	Citizen	110	Section 110.3(a) (page 3 of draft) □ Standards should ensure that impacts from future activities are not only "minimal" but are first, avoided, and if unavoidable, minimized and mitigated. □	Inserted "avoided, and if unavoidable, minimized and mitigated so they"
Don Pryor	Citizen	110	Section 110.3(d) (pages 3-4 of draft) □ What is the meaning of "ensure that all (federal and state) regulatory requirements are integrated into the (Ocean SAMP) process"? The SAMP probably lacks the legal authority to incorporate all federal and state regulations. Would it not be more appropriate to specify some mechanisms to consult with other agencies that have relevant regulatory authorities? □	Inserted "appropriate"
Don Pryor	Citizen	110	Principles □ Section 110.4(c) (page 4 of draft) □ "Honor" is a curious word to use with respect to existing activities. Dictionary definitions include "high regard or great respect given" and "something done as a token or act of respect". To many, this word suggests that perhaps a monument be erected in memory of existing activities. Perhaps "preserve and protect" existing uses would be more appropriate, or "promote and enhance" as used in section 110.3(b). □	Changed "honor" to "highly regarded and respected."

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Name	Organization	Section	Comment	Response
Don Pryor	Citizen	110	Section 110.4(e) (page 4 of draft)□Please clarify whether the monitoring and evaluation that is envisioned will be expected of permittees as a condition or expected of CRMC or other state bodies and, if the later, with what resources. It might also be well to be explicit about what is meant by “transparent” in this context – hopefully it includes rigorous quality assurance/quality control, prompt public availability and peer review of interpretations.□	It is the responsibility of the regulatory agencies to develop appropriate monitoring and evaluation programs. More information on monitoring and evaluation, including the transparent process which will govern this program, will be presented in the Ocean SAMP chapter "New Policies, Procedures, Zoning and Regulations."
Don Pryor		120	Study Area□Section 120.1 (page 5 of draft)□Please clarify whether the Ocean SAMP includes the shoreline and nearshore areas, including jetties, erosion, hardening, beach nourishment, sand mining, etc. □	These coastal features will be regulated using CRMC's existing regulatory program.
Don Pryor		130	Origins□Section 130.1 (page 6 of draft)□Characterizing the MRDP as collaborative in nature is incorrect. The MRDP legislation and development was pointedly done in reaction to legislation and development of state Coordination Team plans. □	The MRDP engaged numerous stakeholders and went through the required rulemaking public process. These public comments were formally responded to and appropriately integrated into the MRDP.
Don Pryor		130	Section 130.3 (page 6 of draft)□Governor Carcieri set the goal of obtaining 15% of the state's electrical power (not “energy”) from wind in 2006 not 2007 as might be implied (see http://www.ri.gov/press/view.php?id=3970). His goal was to reach 15% by 2011. □	Changed text to state "electrical power by 2011."

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Name	Organization	Section	Comment	Response
Don Pryor		140	Responsibilities□Section 140.4 (page 7 of draft)□Please clarify which federal regulations are being referred to. The CZMA (including amendments through 2000) does not have a section 305(b)(8) (see http://epw.senate.gov/czma72.pdf). Regulations under CZMA on energy facility planning processes, which appear to be what is being referred to, are codified as CFR 15-923.13 (http://edocket.access.gpo.gov/cfr_2003/pdf/15cfr923.13.pdf) and were promulgated in the Federal Register in 1996 – 61 FR 33806 of 28 June 1996 and 61 FR 36965 of 15 July 1996 – not volume 42.□	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.

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Name	Organization	Section	Comment	Response
Don Pryor	Citizen	140	<p>Section 140.5(a) (page 7 of draft) <input type="checkbox"/> Please clarify what is meant by “obtain a lease of the state’s submerged lands”. What authorities and regulations apply? Are these established (and, if so, can citations to applicable laws and regulations be provided) or is it envisioned that the SAMP will encompass review, analysis and recommendations for such laws and regulations? Focusing on energy facilities, what fees might be involved, how long would leases extend, what would be maintenance and removal requirements, etc.? Pechulis and Proctor (2009) focused primarily on aquaculture leases but point out several issues that might arise in energy facility leases. Pidot (2009) reported that “Rhode Island has determined that offshore wind power is so essential to its energy needs that little consideration is given to lease compensation beyond reimbursement of the state’s out-of-pocket expenses.” In a footnote to that statement, Pidot noted “These reimbursable expenses might be larger than one might expect. While reporting little interest in lease revenue as such, Rhode Island intends</p>	<p>Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.</p>

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Name	Organization	Section	Comment	Response
Don Pryor		140	<p>Section 140.5(a) (page 8 of draft) <input type="checkbox"/> Please clarify what is meant by “being identified as a preferred vendor by the Department of Administration.” Would this result from an RFP process such as RFP#7067847 of 3 April 2008? Has a preferred vendor for this request already been identified? Presumably execution of this proposal would fall under the rules and regulations of the Ocean SAMP. If so, this introduction chapter should include that information or clearly reference it. Also, are these requirements intended to rule out proposals that do not respond to state RFPs? Could a private enterprise or municipality, on their own, propose an energy facility without being declared a preferred vendor or connected to a state RFP? If such proposals were to be contemplated, how should strength of business plans be evaluated in the leasing process to ensure protection of public trust? <input type="checkbox"/></p>	<p>Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.</p>
Don Pryor		140	<p>Section 140.5(b) (page 8 of draft) <input type="checkbox"/> Presuming this is limited to offshore energy facilities, in addition to ACOE and MMS, FERC also asserted a licensing role if hydrokinetic energy is involved. Also the chapter would be strengthened by specific reference to the recently released MMS regulation mentioned (presumably 74 FR 19637-19871). <input type="checkbox"/></p>	<p>Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.</p>

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Name	Organization	Section	Comment	Response
Don Pryor	Citizen	100	<p>An initial section should be added describing the scope of the Ocean SAMP. The scope appears to be limited to considerations of energy facilities, at least for the iteration this draft is intended to develop. The draft language does not address aquaculture, shoreline management, sand mining/beach nourishment, dredge disposal, fisheries management, or other present and potential uses. Without an explicit statement of scope, some of the language could be applied to those issues in ways that are not intended. Management of energy facilities may, of necessity, impinge on these other uses regardless of whether they are existing or not. The SAMP should state intent not to alter management regimes except as directly related to energy facilities as well as stating a goal to avoid, minimize and mitigate negative impacts of these facilities.</p>	<p>Paragraph will be added in the Spring 2010 version of Introduction Chapter (Spring 2010) once all Chapters are in draft form and SAMP issues have gained clarity. The SAMP's ecological basis will be reflected in this section, as will specific aspects of the scope.</p>

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Don Pryor	Citizen	100	<p>Perceptions of the SAMP should also be clarified. For instance, the SAMP proposal to the RI Office of Energy Resources stated: "Implementing and using an Ocean SAMP is the fastest, most efficient and cost-effective way to approve and site offshore renewable energy projects. The alternative is the development of an Environmental Impact Statement (EIS). The ACOE has indicated that an EIS process for this project could optimistically take at least five to seven years. In just two years, the Ocean SAMP, will meet the requirements of the MMS, the ACOE, NOAA, CRMC, and the Rhode Island Department of Environmental Management (DEM) for scientific analysis and planning, including stakeholder involvement." This introduction chapter of the SAMP should make clear that, though it may assist, it will not replace requirements for energy facility proposals to develop and have approved an EIS.</p>	<p>This comment will be discussed in Section 140 in Spring 2010 Introduction version.</p>

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Name	Organization	Section	Comment	Response
Melville P. Coté, Jr.	U.S. Environmental Protection Agency, Region 1	110	<p>It appears that the overarching objective of the Ocean SAMP is to determine the baseline of environmental conditions and then enhance marine commerce in a way that will not impact that baseline. Recognizing that a significant data collection effort is underway to establish that baseline, some important resources are already depleted or degraded and the current status of the system may not be the most appropriate baseline. There is no discussion of enhancing or restoring these natural resources, and we believe this should be part of the plan. □□ There seems to be an implicit assumption in the first goal statement under the “Goals for the Ocean SAMP” section on p. 3 that the system is currently a “properly functioning ecosystem.” While we recognize that it’s difficult, if not impossible, to precisely define a properly functioning ecosystem, we are concerned that there is an assumption that the current situation is reasonable and acceptable. There are some very serious and well documented issues – winter flounder population declines, lobster shell disease, invas</p>	<p>Text has been added in Section 100 to reflect that the overarching goal of the Ocean SAMP is to uphold CRMC’s authority and responsibility to preserve, protect, develop, and where possible, restore the coastal resources of the state. In addition, text has been included that states that the preservation and restoration of ecological systems shall be the primary guiding principle upon which environmental alteration of coastal resources will be measured, judged, and regulated.</p>

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Name	Organization	Section	Comment	Response
Melville P. Côté, Jr.	U.S. Environmental Protection Agency, Region 1	110	3. Goals for the Ocean SAMP: <input type="checkbox"/> <input type="checkbox"/> [See electronic comments file for track changes edits] Foster a properly functioning ecosystem that can be both ecologically sound and economically beneficial. Restore and maintain the ecological capacity, integrity, and resilience of the Ocean SAMP's biophysical and socioeconomic systems. Conduct research to better understand the current status of the natural resources, ecosystem condition and the implications of various human activities. Set standards within the SAMP document to restore and enhance natural resources and ensure that impacts from future activities are minimal and acceptable to the scientific community and the people of Rhode Island. Establish monitoring protocols to evaluate the consequences of decisions and adapt management to the <input type="checkbox"/>	Goal changed to reflect comment.
Melville P. Côté, Jr.	U.S. Environmental Protection Agency, Region 1	110	Stepping back from the details, our broader concern is that there is potentially a lost opportunity. The Ocean SAMP could be an opportunity to better understand and manage (restore) the entire system (improving the state of various natural resources to the benefit of all), rather than simply being a vehicle for adding more commercial activities to an already impacted system. Rather than a goal that essentially calls for maintaining the status quo with regard to ecosystem health, the goal could be to protect and restore the system while developing new uses of the environment.	This concern is addressed by adding additional text in Section 100.

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Melville P. Côté, Jr.	U.S. Environmental Protection Agency, Region 1	140	<p>The brief reference in subsection 5.d. on p. 8 to federal statutory and regulatory requirements other than those that apply specifically to the licensing or permitting of a particular project does a disservice to readers of the Ocean SAMP who are not familiar with this complex network of requirements. While the SAMP only needs approval by NOAA under the CZMA, any project proposed under the auspices of the plan will need to undergo a rigorous environmental impact review under the National Environmental Policy Act, Endangered Species Act, and Magnuson-Stevens Fishery Conservation and Management Act. Project proponents will need to coordinate or consult with the U.S. Environmental Protection Agency, the U.S. Fish and Wildlife Service, and the National Marine Fisheries Service to ensure compliance with these laws. Depending on the nature of the project, it also may be subject to the National Historic Preservation Act, which requires an assessment of potential impacts to historic and cultural resources. Projects that proceed to construction and operation may need</p>	<p>Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.</p>

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Richard C. Hittinger	Alliance Environmental Group	110	you discuss the stakeholder process in the guiding principles, but it does not show up in the goals. From what I see, you have worked very hard to involve all stakeholders and it is a key goal of the project to have something that reflects input from a diverse group of stakeholders. I think the goals should include a statement that demonstrates your level of commitment to the stakeholder process. It would be a grand goal to establish a process that encourages continuing stakeholder involvement even after the completion of the SAMP. You may be able to do that by working a phrase such as the following into the goals: "...that is a result of a participatory process including all major stakeholders" and/or "... that encourages ongoing stakeholder participation"	Importance of stakeholder process is appropriately addressed in both the preface for goals (par #2) and is a guiding principles.
Richard C. Hittinger	Alliance Environmental Group	110	add the word "with" after consistent.	added "with."
Richard C. Hittinger	Alliance Environmental Group	140	first line - change essential to "essentially"	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.
Richard C. Hittinger	Alliance Environmental Group	140	does not add anything. It needs further explanation or it is so general that it is of no use.	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.

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Tricia K. Jedele	Conservation Law Foundation	100	<p>If the Introduction chapter is really to serve a critical purpose; a guiding framework for the remainder of SAMP chapters, then generally speaking, the goals and principles of the Introduction Draft chapter should be stated much more clearly to reflect the central theme of ensuring ecosystem protection while allowing for the sustainable development of our ocean resources. As it is currently written, the Introduction reflects an overall weighting in favor of ocean development and maintaining existing uses (whether those uses are proving to be sustainable or not) as opposed to focusing on ecosystem health and sustainability. A central goal of the SAMP must be restoration, protection, and maintenance of a healthy ocean ecosystem. This policy goal is not inconsistent with renewable energy development and is central also to President Obama's emerging national ocean policy.□</p>	<p>Text has been added in Section 100 to reflect this concern. In addition the first Goal has been rewritten.</p>

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Tricia K. Jedele	Conservation Law Foundation	100	<p>Page 2 ¶ 2 – “Although little is known about this ecosystem, the Ocean SAMP region continues to experience many of the issues common to growing coastal regions,” □□ This statement simply is not true. While it is certainly true that in the realm of science, we will always be learning and gathering more data, thanks to the work of the University of Rhode Island’s Graduate School of Oceanography, which has been studying these waters for decades, and to the SAMP process itself that has presumably been gathering data and conducting various scientific studies on the physical, biological, and oceanographic characteristics of Rhode Island’s water for the past year, we have a tremendous amount of information about our ocean waters. And, significantly, all of this information reflects the fact that Rhode Island’s ocean waters have been seriously impacted by various human activities – overfishing, pollution, climate change, etc.... For this reason, the Introduction should contain a statement that clearly provides that while we still have a lot to learn about our ocean waters, v</p>	<p>One of the outcomes from the 2008 Baird Symposium, which focused on our existing understanding of the Ocean SAMP study, was that there are significant data gaps as well as an understanding of how this data connects and the entire ecosystem works.</p>
Tricia K. Jedele	Conservation Law Foundation	100	<p>Page 2 ¶ 3 – This paragraph lists “issues common to coastal waters,” but fails to mention the variety of human activities that have been acting as key drivers of change to our ocean ecosystem over the last few decades. For example, point and no-point source pollution, overfishing, and coastal construction and development and offshore habitat alteration.</p>	<p>Inserted "coastal construction and developed." This list is meant to be representative of issues and not intended to be all inclusive.</p>

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Name	Organization	Section	Comment	Response
Tricia K. Jedele	Conservation Law Foundation	110	Page 3 ¶ 3a – Foster a properly functioning ecosystem that can be both ecologically effective and economically beneficial. □□ First, it is unclear what is meant by the phrase “maintaining the evolution of the SAMP’s biophysical and socioeconomic systems.” CLF respectfully suggests that the word “recognizing” the evolution of ... better captures this idea. □□□□	This goal has been rewritten for clarity.

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Tricia K. Jedele	Conservation Law Foundation	110	<p>Second, “fostering” a properly functioning ecosystem is a different concept than simply “maintaining” the current status of our ocean ecosystem. The stated goal, therefore, should go beyond “maintaining” the ecological capacity and integrity of Ocean SAMP biophysical and socioeconomic systems, and instead should be to “restore, protect and maintain” these systems to reflect the fact that our ocean waters have already been compromised and are in need of restoration and protection. In other words, to the extent that our ocean waters are presently in an unhealthy state, our goal should not be simply to maintain that current unhealthy state. This point is supported by President Obama’s call for a national ocean policy that: “ensures the protection, maintenance, restoration of the health of ocean, coastal, and Great Lakes ecosystems and resources.” This point is also consistent with CRMC’s obligations under the U.S. Coastal Zone Management Act of 1972 (“CZMA”) to provide for the “protections of natural resources within the coastal zone,” and to “manage coastal development to improve, sa</p>	This goal has been rewritten for clarity.

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Name	Organization	Section	Comment	Response
Tricia K. Jedele	Conservation Law Foundation <input type="checkbox"/> <input type="checkbox"/>	110	<p>Third, the SAMP should clearly state a desire to develop an ecosystem-based management approach to ocean management. The recently released report by the Interagency Ocean Policy Task Force supports: “adopting ecosystem-based management as a guiding principle, acknowledging regional differences, and practicing adaptive management.” In the spirit of enhancing the much needed coordination between federal and state processes, our goals and principles should at the very least look to the goals and principles articulated by the federal ocean policy task force as a floor for the principles we adopt. Goal 3a is an appropriate place in the Introduction to describe the CRMC’s commitment to ecosystem-based management. [footnote]</p> <p>http://www.whitehouse.gov/assets/documents/09_17_09_Interim_Report_of_Task_Force_FIN_AL2.pdf</p>	<p>Additional text in Sections 100 and 110 has been added to better reflect CRMC’s commitment to ecosystem-based management.</p>

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Tricia K. Jedele	Conservation Law Foundation <input type="checkbox"/> <input type="checkbox"/>	110	Fourth, with respect to the issue of standards, CRMC should work toward a standard of avoiding any significant alteration or impact to the ocean ecosystem, rather than to “minimize” the impact. It would be more protective to state: “Set standards within the SAMP document that seek to avoid significant impacts to the ocean ecosystem.” It is also unclear what the phrase “acceptable to the scientific community” means, and it is an unusual accommodation to see in the paragraph describing the goal of agency standard-setting. For example, Shouldn’t the standards be set based on what the best available science tells us is needed to avoid impacts? How would review by the scientific community be triggered? Which groups or individuals would be considered part of the scientific community? What level of review warrants the conclusion that the impacts found are “minimal” and “acceptable?”	Inserted "avoided, and if unavoidable, minimized and mitigated so they..."
Tricia K. Jedele	Conservation Law Foundation <input type="checkbox"/> <input type="checkbox"/>	110	Page 3 ¶ 3b – Promote and enhance existing uses. <input type="checkbox"/> <input type="checkbox"/> The last sentence of this paragraph should read “while avoiding significant impact on the natural environment” rather than “having minimal impact.” <input type="checkbox"/>	Inserted "ensuring that impacts from future activities are avoided and, if they are unavoidable, are minimize."

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Name	Organization	Section	Comment	Response
Tricia K. Jedele	Conservation Law Foundation □ □	110	Page 3 ¶ 3c – Encourage marine-based economic development that meets the aspirations of local communities and is consistent and complimentary to the state’s overall economic development needs and goals.□□CLF recommends adding the phrase “ecosystem needs” after the “state’s overall” and before “economic development needs and goals.” □	Inserted "social, and environmental" in third goal.
Tricia K. Jedele	Conservation Law Foundation □ □	110	Page 4 ¶ 4a-e – Principles Guiding SAMP Design and Development.□□CLF recommends adding a guiding principle to this section and that to the extent the order of the principles listed in sub a-e suggests prioritization, the principles be ordered differently. First, CLF would like to see the incorporation of a guiding principle that provides: “respect the ocean ecosystem and restoring and protecting the diversity of marine plants and animals and the habitats they depend upon.” As for prioritization, CLF recommends the following order: □□a. Develop in a transparent manner.□b. Involve all stakeholders.□c. Base all decisions on the best available science. □d. Respect the ocean ecosystem and restoring and protecting the diversity of marine plants and animals and the habitats they depend upon.□e. Honor existing activities.□f. Establish monitoring and evaluation that supports adaptive management.□□Finally, paragraph 4a “develop in a transparent manner,” should specifically reference the formal rulemaking plan adopted by the CRMC subcommittee and the role of formal rulemaking generally speaking	This issue is addressed in added text in section 100 and in Principle C. "Transparency" is appropriately addressed in 4a.

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Name	Organization	Section	Comment	Response
Tricia K. Jedele	Conservation Law Foundation	120	<p>Section 120. Ocean SAMP Study Area□□Page 5 ¶ 1 – If we are developing an Ocean SAMP that is truly based on the principles of ecosystem-based management, at least in part, then we should indicate that the Ocean SAMP area was selected not only because the natural and human activities that in place in these offshore waters impact the people of Rhode Island, but also that the marine environment and ocean ecosystem in the selected area has been and is currently impacted by human activities. It is also important to distinguish the reasons a particular boundary was drawn by the Army Corps of Engineers (“ACOE”) or a similar boundary drawn by the RIWINDS Phase I: Wind Energy Siting Study. Disposal sites for dredge material and potential wind energy infrastructure sites are but two of the many uses that might inform the boundary lines drawn by the CRMC for the Ocean SAMP. □</p>	<p>Inserted "and conversely human activities also impact the Ocean SAMP ecosystem."</p>
Tricia K. Jedele	Conservation Law Foundation	130	<p>Section 130. Origins of the Ocean SAMP□□Generally speaking, the paragraphs explaining the origins of the SAMP focus on “optimizing potential uses of marine resources,” and does not explain how the concept of ecosystem-based management has informed the development of the SAMP, if at all.□□</p>	<p>130.1 has been amended to explain how the concept of ecosystem-based management is part of the SAMP process.</p>

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Tricia K. Jedele	Conservation Law Foundation	130	Page 6 ¶ 1 – CRMC could explain the Marine Resources Development Plan in fuller detail. What exactly does the MRDP require of the CRMC in terms of ocean planning?	For more information on the MRDP, please refer to the CRMC web site.
Tricia K. Jedele	Conservation Law Foundation	130	Page 6 ¶ 3 – It would be remiss not to mention how the SAMP is being funded and the origins of that funding in terms of the Joint Development Agreement between Deepwater and the State of Rhode Island. This fact is as much a part of the SAMP's origins as the Marine Resources Development Plan.□	Additional text has been included in Section 130 that describes the financial commitment made by the state.
Tricia K. Jedele	Conservation Law Foundation	140	Section 140. The CRMC's state and federal responsibilities□□Page 7 ¶ 2 – CRMC should indicate whether and how it intends to incorporate the SAMP into the State's coastal zone management program.	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.

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Tricia K. Jedele	Conservation Law Foundation	140	Page 7 and 8 ¶ 5a – Presumably, the CRMC's permitting process will have to be amended and further developed to allow for the additional considerations that would come along with siting a large offshore wind energy project in SAMP jurisdictional waters. It would be helpful in the context of the Regulatory Framework paragraphs for CRMC to discuss the additional CRMC permitting requirements it envisions for permittees outside of the subsequent leasing process and beyond the current permitting regulations for dock extensions, marina expansions and on-land development. For example, will a permittee proposing an offshore wind farm within the SAMP area be required to supply data in application materials that address long-term maintenance, climate change impacts, environmental and natural resources concerns, etc...?	Section 140 will be revised in Spring 2010, pending additional legal research. This comment will be considered at that time.
Robert DeSista	US Army Corps of Engineers	100	"Transparency informs the development..I." what does this mean	Changed quote "informs" to "guides"
Robert DeSista	US Army Corps of Engineers	100	"Major activities and uses including..." not a complete sentence	Completed sentence
Robert DeSista	US Army Corps of Engineers	100	Does SAMP address: -Bonding, -Multiuse of structures, -Decommission and removal of facilities?	This will be address in Renewable Energy chapter
Robert DeSista	US Army Corps of Engineers	100	"vendor by Department of Administration" who and what is this?	Added "RI"