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Comment from Bellandi, Crissy

Posted by the **National Oceanic and Atmospheric Administration** on Sep 3, 2025

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Comment

September 03, 2025

Department of Commerce National Oceanic and Atmospheric Administration
Re: Comments on Deep Seabed Mining: Revisions to Regulations for Exploration License and Commercial Recovery Permit Applications
Attention: DSHMRA Proposed Rule Comments
Docket Number: 250630-0118
RIN: 0648-BN96

Dear Mr. Kerry Kehoe, Federal Consistency Specialist, Office for Coastal Management, NOAA,


I am opposed to the proposed rule by NOAA to revise Deep Seabed Hard Mineral Resources Act (DSHMRA) rules.

Specifically, I am opposed to any consolidation of licensing and permitting procedures. The American public is not served by insufficient diligence or careless permitting, which may occur under consolidated procedures. In all cases, an environmental impact statement (EIS) must be required at each of the licensing and permitting phases.

Additionally, the proposed fee for the consolidated application, \$350,000, is grossly insufficient to reflect the harm that deep sea mining activities cause to the oceans. As the costs of restoration and remediation activities along with the loss of ecosystems are borne by the public, the fee should reflect these costs to the American taxpayer. Accordingly, the fee for each of the licensing and permitting phases should be separate and use a fee schedule based on the size of the geographic area to be mined, the present value of the ecosystem, the value of each impacted species (with a complete accounting of all species in the geographic area by both variety and quantity of individuals within species), and the gross cost of restoring the area to a pre-mined state, with a minimum fee of \$10,000,000 for each of the licensing and permitting phases. The American taxpayer should be compensated for the tragedy of the commons that fundamentally underpins deep sea mining.

Thank you for your consideration.

Comment ID
NOAA-NOS-2025-0108-1488

 **Tracking Number**
mf4-07hf-fxgu

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Comment Details	Submitter Info
Submitter Name Crissy Bellandi	
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