



Advocacy Department

Six Beacon Street, Suite 1025 • Boston, Massachusetts 02108
tel 617.962.5187 • fax 617.523.4183 • email jclarke@massaudubon.org

February 17, 2012

US Department of the Interior
Bureau of Ocean Energy Management
Office of Renewable Energy Programs
381 Elden Street
HM 1328
Herndon, Virginia 20170

**Re: US Department of the Interior/Bureau of Ocean Energy Management;
[Docket No. BOEM–2011–0097]; *Commercial Leasing for Wind Power on the Outer
Continental Shelf Offshore Massachusetts — Call for Information and Nominations***

US Department of the Interior/Bureau of Ocean Energy Management:

Mass Audubon thanks the US Department of the Interior/(DOI) Bureau of Ocean Energy Management (BOEM) for providing this opportunity to comment on the proposed *Commercial Leasing for Wind Power on the Outer Continental Shelf (OCS) Offshore Massachusetts—Call for Information and Nominations (Call Area.)*

Summary

Mass Audubon supports DOI Secretary Salazar's *Smart from the Start* OCS renewable energy initiative as it advances America's offshore renewable energy policy to achieve 10 gigawatts of wind energy from the OCS and Great Lakes by 2020. We also support the intent of the *Call Area* subject to further environmental studies required to inform BOEM on necessary conditions for the siting of any commercial wind facilities on the Northwest Atlantic OCS. We simultaneously encourage BOEM to move forward with the lease sale process.

As an appointed member of the Massachusetts Executive Office of Energy and Environmental Affairs' (EEA) Habitat Working Group on Offshore Renewable Energy Development (see p. 11 of this *Notice*), Mass Audubon advised state and federal officials on shaping this *Call Area* and continues to consult with EEA and BOEM as the OCS commercial wind leasing process moves forward to the *Area Identification* stage. We appreciate the reduction in size of the *Request for Interest (RFI) Area* by almost fifty percent due to the presence of, among other things, winter sea ducks.

Context

Mass Audubon's review of, comment on, and conditional support for the *Call Area* is conducted within the context of the threat of rapid climate warming, oil spills, strip mining, air pollution, and the push for nuclear power as a clean energy source. There is scientific consensus that the burning of fossil fuels, such as natural gas and oil, releases heat-trapping gases like carbon

dioxide and methane that rapidly heat the earth. Burning of fossil fuels also results in the release of mercury that bioaccumulates in the environment, causing health problems for humans, especially pregnant women and children, and those living in urban communities. Rising sea levels and severe coastal storms related to the earth's warming flood low-lying barrier beaches and islands that serve as critical habitat for coastal birds including the federally endangered roseate tern and federally threatened piping plover.

To reduce the worst effects of climate change, Mass Audubon supports increased energy conservation and efficiency as a first priority. Production of electricity from clean energy sources also needs to grow quickly to reduce the worst effects of rapid climate change. However, the growth of renewable energy must be done responsibly to minimize adverse environmental impacts. Of the renewable energy technologies available today, over the long term, wind energy is the most cost-effective and reliable.

Over the last decade, Mass Audubon has been extensively involved in review, comment and direct research on America's first proposed wind energy proposal for the OCS - Cape Wind (http://www.massaudubon.org/wind/cape_wind.php.) Relevant data (http://www.massaudubon.org/wind/avian_research.php) has been provided to BOEM as shown in the *Cape Wind Energy Project Draft Environmental Impact Statement* (DEIS), January, 2008 (<http://www.boemre.gov/offshore/RenewableEnergy/DEIS/Volume%20I%20%20Cape%20Wind%20DEIS/Cape%20Wind%20DEIS.pdf>).

Since 2005, we have also reviewed, commented on and consulted with DOI on the *OCS Alternative Energy and Alternate Use Program* through which this *Call Area* is announced.

Avian research needs

The development of offshore alternative energy facilities has the potential to impact bird species. Additional data are therefore necessary to help define the presence or absence of bird species of conservation concern in, around, and adjacent to the *Call Area*. This information will be critical to BOEM as it decides where to license placement of offshore facilities. Bird species in close proximity to and within the *Call Area* that should remain as highest priority in BOEM's ongoing review include globally significant populations of long-tailed ducks and the federally listed endangered roseate tern. Information gaps also remain about shorebird foraging and migratory movements through the *Call Area*.

Mass Audubon continues to call your attention to DOI/Minerals Management Service funded and US Geological Service (USGS) cooperation on sea duck studies in and around the *Call Area* subject to the December 29, 2010 *Massachusetts RFI*. Our comments were provided to you in response to the *RFI* on March 9, 2011.

As BOEM implements and proceeds with the *Energy Policy Act* and *National Environmental Protection Act* for this *Call Area*, we urge you to employ the latest and best relevant data and information regarding area avian species. This includes studies you have completed, those that are ongoing, and those that will be started in 2012. We also encourage you to identify and fill data gaps that may occur at the conclusion of the commercial lease sale process but prior to construction and operation phases.

In particular, we call your attention to ongoing environmental studies, the results of which will be critical to BOEM decisions on any Northwest Atlantic OCS wind energy lease sale.

First, *Surveying for Marine Birds in the Northwest Atlantic*. The proper siting of OCS commercial wind energy facilities is critical in order to avoid, minimize, and mitigate impacts to bird species. Refined data is needed on the seasonal distribution, abundance, and congregation of present species of marine birds in, around and adjacent to the *Call Area*.

Second, *Potential for Interactions between Endangered and Candidate Bird Species with Wind Facility Operations on the Atlantic OCS*. Of key concern in the siting wind energy facilities is the potential impact to endangered, threatened, or candidate species of birds that migrate in, around, and adjacent to the *Call Area*. Piping plovers, roseate terns, and red knots can potentially be impacted by offshore wind facilities. If there is a potential for bird strikes, an evaluation of the impacts of mortality on the population should be assessed.

Third, *Determining Distributions and Movements of Long-tailed Ducks Using Satellite Telemetry*. BOEM and Mass Audubon have identified potential impacts to birds as a primary biological concern and have been seeking additional data to describe bird use of Nantucket Sound. These data build upon a previous effort, cited above, conducted during winters 2007-2010 by Mass Audubon in collaboration with USGS which captured, tagged, and tracked long-tailed ducks in and around the Nantucket Sound to determine movement patterns and areas where ducks congregate. We will shortly be providing you with more robust data to help determine roosting sites across the Nantucket Sound area, migration and breeding locations and night-time movements of long-tailed ducks in Nantucket Sound and adjacent waters. This additional information will help determine whether long-tailed duck roost sites are concentrated or widely scattered across Nantucket Sound, and whether there is genetic differentiation within the wintering duck populations in Nantucket Sound. The results of this study will also provide a baseline estimate of the relative abundance and movements of wintering sea ducks that will help BOEM detect and interpret changes in long-tailed duck abundance and distribution in and around the *Call Area*. This includes detection of changes in the numbers, movements and distribution of wintering sea ducks in response to the construction of a wind farm, or whether the ducks experience habitat loss or displacement.

In addition, the Massachusetts Clean Energy Center-funded avifauna studies in the *Call Area* conducted by Dr. Richard Veit of the City University of New York/College of Staten Island will further inform BOEM on the presence, abundance, and behavior of area bird species. Mass Audubon looks forward to the results of those studies.

Finally, as the Governor's appointed "environmental" representative to the 17-member Massachusetts Ocean Advisory Commission, we urge BOEM to share lease sale data with the National Ocean Council as it advances the President's executive order on Coastal and Marine Spatial Planning.

Thank you again for this opportunity to comment.

Sincerely,



John J. Clarke
Director of Public Policy and Government Relations

Mass Audubon works to protect the nature of Massachusetts for people and wildlife. Together with more than 100,000 members, we care for 34,000 acres of conservation land, provide educational programs for 225,000 children and adults annually, and advocate for sound environmental policies at local, state, and federal levels. Mass Audubon's mission and actions have expanded since our beginning in 1896 when our founders set out to stop the slaughter of birds for use on women's fashions. Today we are the largest conservation organization in New England. Our statewide network of wildlife sanctuaries, in 90 Massachusetts communities, welcomes visitors of all ages and serves as the base for our work. To support these important efforts, call 800-AUDUBON (283-8266) or visit www.massaudubon.org.