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March 9, 2011

US Department of the Interior
Bureau of Ocean Energy Management, Regulation and Enforcement
Office of Offshore Alternative Energy Programs
381 Elden Street
Mail Stop 4090
Herndon, Virginia 20170

Re: US Department of the Interior/Bureau of Ocean Energy Management, Regulation and Enforcement; [Docket No. BOEM–2010–0063]; *Commercial Leasing for Wind Power on the Outer Continental Shelf Offshore Massachusetts—Request for Interest*

US Department of the Interior/Bureau of Ocean Energy Management, Regulation and Enforcement:

Mass Audubon thanks the US Department of the Interior's (DOI) Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) for providing this extended opportunity to comment on the proposed *Commercial Leasing for Wind Power on the Outer Continental Shelf Offshore Massachusetts—Request for Interest*. Two avian species of concern in the proposed project area are Long-tailed Ducks (*Clangula hyemalis*) and Roseate Terns (*Sterna dougalli*).

Over the last ten years, Mass Audubon has been extensively involved in review, comment and direct research on the Cape Wind Energy Project (http://www.massaudubon.org/wind/cape_wind.php). We have also reviewed, commented and consulted with DOI on the *OCS Alternative Energy and Alternate Use Program*. We especially call your attention to DOI/Minerals Management Service funded and US Geological Service (USGS) cooperation on sea duck studies in and around the area subject to the *Request of Interest* (RFI). This information (http://www.massaudubon.org/wind/avian_research.php) is already at BOEMRE as it was included in the *Cape Wind Energy Project Draft Environmental Impact Statement* (DEIS), January 2008 (<http://www.boemre.gov/offshore/RenewableEnergy/DEIS/Volume%20I%20Cape%20Wind%20DEIS/Cape%20Wind%20DEIS.pdf>).

As a result of this work, we provide you with the following information to be considered as BOEMRE reviews responses to this *Request for Interest*.

The proposed project area is part of a globally significant habitat for Long-tailed Ducks (*Clangula hyemalis*). Data collected from 1997-2011 (BH White et al, 2008) show that no fewer

than 300,000-500,000 Long-tailed Ducks complete a daily commute from inside Nantucket Sound to forage in the waters immediately west of the Nantucket Shoals. These data indicate that there is considerable overlap of the proposed project area with high concentrations of this species and the area in the RFI. According to a paper published in *Waterbirds* by Dr. Richard Veit (City University of New York/College of Staten Island) and his graduate student, Tim White, (White et al. 2008), this concentration of Long-tailed Ducks represents at least 30% of the entire North American breeding population. Their research confirms the specialized foraging behavior of this species on pelagic amphipods, apparently concentrated in 'balls' that are the focus of Long-tailed Ducks foraging on the edge of Nantucket Shoals.

Mass Audubon's collaborative studies with USGS Patuxent Wildlife Research Center on Long-tailed Duck movements using satellite tracking have also confirmed extensive use of Nantucket Shoals by Long-tailed Ducks. Thus impacts on Long-tailed Ducks and their food resources should be a priority research and monitoring consideration in the RFI.

Mass Audubon's recent (2008-2010) tern counts and band re-sighting studies on nearby Muskeget Shoals confirms that large numbers of endangered Roseate Terns use Muskeget Shoals regularly throughout the post-breeding period (late July through September), resting and likely foraging nearby. Muskeget Shoals is approximately 10 miles from the 2,224 sq. mile RFI. Although we have not collected data on the foraging locations of Roseate Terns in this area, it is possible that they forage in the proposed project area, given what is known about foraging distances for this species and the fact that sand lance (a fish species that relies on sandy shoals) are known to be an important part of Roseate Tern diet. Multi-year studies on individual movements (using radio or satellite transmitters) and aerial and boat surveys will be important to identify risk to Roseate and state-listed Common Terns from any wind energy development in this area.

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.

Protecting the Nature of Massachusetts