



Advocacy Department

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July 15, 2014

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–2014–0034]; *Commercial Leasing for Wind Power on the Outer Continental Shelf Offshore Massachusetts — Proposed Sale Notice*
and
[Docket No. BOEM–2014-011]; *Commercial Wind Lease Issuance and Site Assessment Activities on the Atlantic Outer Continental Shelf (OCS) Offshore Massachusetts*

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 Offshore*; and the *Commercial Wind Lease Issuance and Site Assessment Activities on the Atlantic Outer Continental Shelf Offshore Massachusetts*.

Summary

Mass Audubon supports Department of the Interior (DOI) Secretary Sally Jewell's renewable energy initiative as it advances America's offshore renewable energy policy to achieve 10 gigawatts of wind energy from the Outer Continental Shelf (OCS) and Great Lakes by 2020. We also support the intent of the *Sale 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 expeditiously 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, Mass Audubon advised state and federal officials on shaping this *Sale Area* and continues to consult with EEA and BOEM as the OCS commercial wind leasing process moves forward.

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 *Sale 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.

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 also regarding large whale species and sea turtles.

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.

Protecting the Nature of Massachusetts