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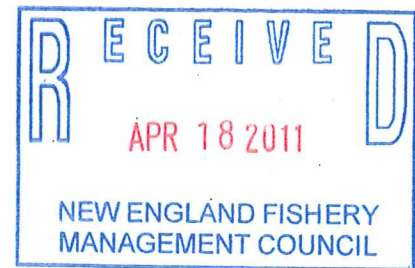
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April 15, 2011

Ms. Maureen Bornholdt
Bureau of Ocean Energy Management, Regulation and Enforcement
Office of Offshore Alternative Energy Programs
381 Elden Street
Mail Stop 4090
Herndon, Virginia 20170



RE: Commercial Leasing for Wind Power on the Outer Continental Shelf (OCS) Offshore Massachusetts – Request for Interest (RFI)

Dear Ms. Bornholdt:

We are writing to provide comments regarding the Bureau of Ocean Energy Management, Regulation and Enforcement's (BOEMRE) Request for Interest (RFI) – Commercial Leasing for Wind Power on the Outer Continental Shelf Offshore Massachusetts. The Nature Conservancy recently submitted comments in response to BOEMRE's Notice of Intent to Prepare an Environmental Assessment for Mid-Atlantic Wind Energy Areas. We appreciate the opportunity to provide further input on the Bureau's Smart from the Start initiative developed in conjunction with the Commonwealth of Massachusetts. Rather than reiterate comments made in our mid Atlantic letter, some of which are pertinent to the MA RFI, we have attached it as an addendum to this letter.

The Conservancy recognizes that there will be additional opportunities for public comment in the coming months, as the locations of potential wind energy development sites are refined, leases are proposed, and specific projects are developed south of Massachusetts. We expect to comment in greater detail as the Bureau hones in on the locations most likely to be made available for wind energy leases.

These comments focus on the results of our Northwest Atlantic Marine Ecoregional Assessment (NAM ERA) and several key analysis overlays from that assessment with the RFI area. We have included several maps for your consideration:

- Map 1 shows the Massachusetts RFI Area boundary along with shipping lanes, fairways and separation zones, many of which overlap the proposed area. This map also includes the Nantucket Lightship Closed Area, which has been closed to most groundfish activities since 1994. Additional protections in an overlapping habitat closed area were established in 2003, to protect significant habitat features for species managed by the New England Fishery Management Council. We have also included the Nantucket Lightship scallop access area in this map, which is a part of a highly successful rotational management program governing one of the nation's most lucrative fisheries. Access to rotational management areas significantly reduces the amount of time scallop dredges are deployed (i.e. —catch per unit of effort has increased significantly under the rotational management program). Due to the significant overlap of all these management features, we suggest BOEMRE and the Commonwealth may need to do

additional work to precisely define and consider the tradeoffs that may result from wind energy development in these areas.

- Maps 2-5 show several commercially important species (haddock, cod, yellowtail flounder, winter flounder and sea scallops) as they overlap with the MA RFI area. These maps use pounds landed as a proxy for importance to these species. While there is a notable lack of fishing effort in the center of the area, we ask that BOEMRE consider that commercial fishing has been restricted for nearly two decades in that area. Therefore, a lack of fishing effort (and pounds landed) does not translate into importance for these important species' biological productivity. Additional work may also be needed to evaluate potential impacts to habitat.
- Map 6 shows areas of very high importance for marine mammals. Not surprisingly, the data show the Great South Channel, within and adjacent to the eastern extent of the RFI area, serves as an important migratory pathway for a number of marine mammal species, including several endangered species. Several other blocks are also highlighted within the RFI area. While the number of highlighted blocks is relatively few, the data used for this map focuses on areas with a very high occurrence of marine mammal sightings (greater than two standard deviations above the mean). Spatial data on marine mammals is largely limited to observations of animals at the surface. Therefore, it is difficult to determine the full scope of areas important to these species. As a result, TNC recommends BOEMRE support additional research on migratory patterns of marine mammals in any area that may be developed for wind energy.
- Map 7 shows the Massachusetts RFI area overlaid with important seafloor areas. This map shows the important seafloor areas developed by TNC in relation to the proposed offshore wind area. These areas, identified through the second phase of the NAM ERA-, were identified based on the presence, abundance, and persistence of six characteristics: persistence of demersal fish species, diverse demersal fish communities, corals and canyons, hard bottoms, seagrass, and benthic habitats. Therefore, we suggest BOEMRE and the Commonwealth may wish to pay particularly close attention to avoiding impacts to sensitive features within these highlighted areas as specific locations for wind energy projects are determined. We recommend that high resolution mapping be completed in these areas, so that the wind energy infrastructure will avoid impacts on sensitive features in these areas.

It is important to emphasize that the NAM ERA data used to create these maps were intended for regional assessments such as the assessments of potential WEAs that BOEMRE is conducting. The NAM ERA is designed to understand and highlight regional scale patterns, and can be less appropriate for use smaller state scale siting and planning. Some data used in the assessment has gaps, uncertainty and is not uniform, and some portions are more robust than others because of varying availability and resolution of data (e.g. seabirds, marine sediments). Therefore, these data should not be used to draw conclusions or make decisions about the suitability of individual OCS blocks for offshore wind energy without further investigation and site specific data collection at the OCS block scale. However, the use of these data can inform siting decisions regarding offshore wind and flag conservation concerns to be further explored in the NEPA environmental review process.

Lastly, we ask BOEMRE to consider the new Essential Fish Habitat designations and Habitat Areas of Particular Concern that have been in development for several years through the New England Fishery Management Council. While these new designations have not yet been written into regulation, they represent a significant new body of work that characterizes the ecological value of the area for

commercially valuable fish species within and adjacent to the MA RFI area and should be considered in your decision making process.

As we articulated in the attached letter regarding Mid-Atlantic Wind Energy Areas, The Nature Conservancy recognizes wind as a valuable, emissions free source of renewable energy. We reiterate here the need for great care in determining the location of offshore industrial projects and considering both construction and operational impacts. We look forward to playing a helpful role in advancing the Smart from the Start Initiative with BOEMRE and the Commonwealth. Thank you for your attention to our comments.

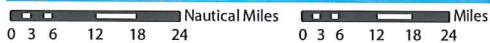
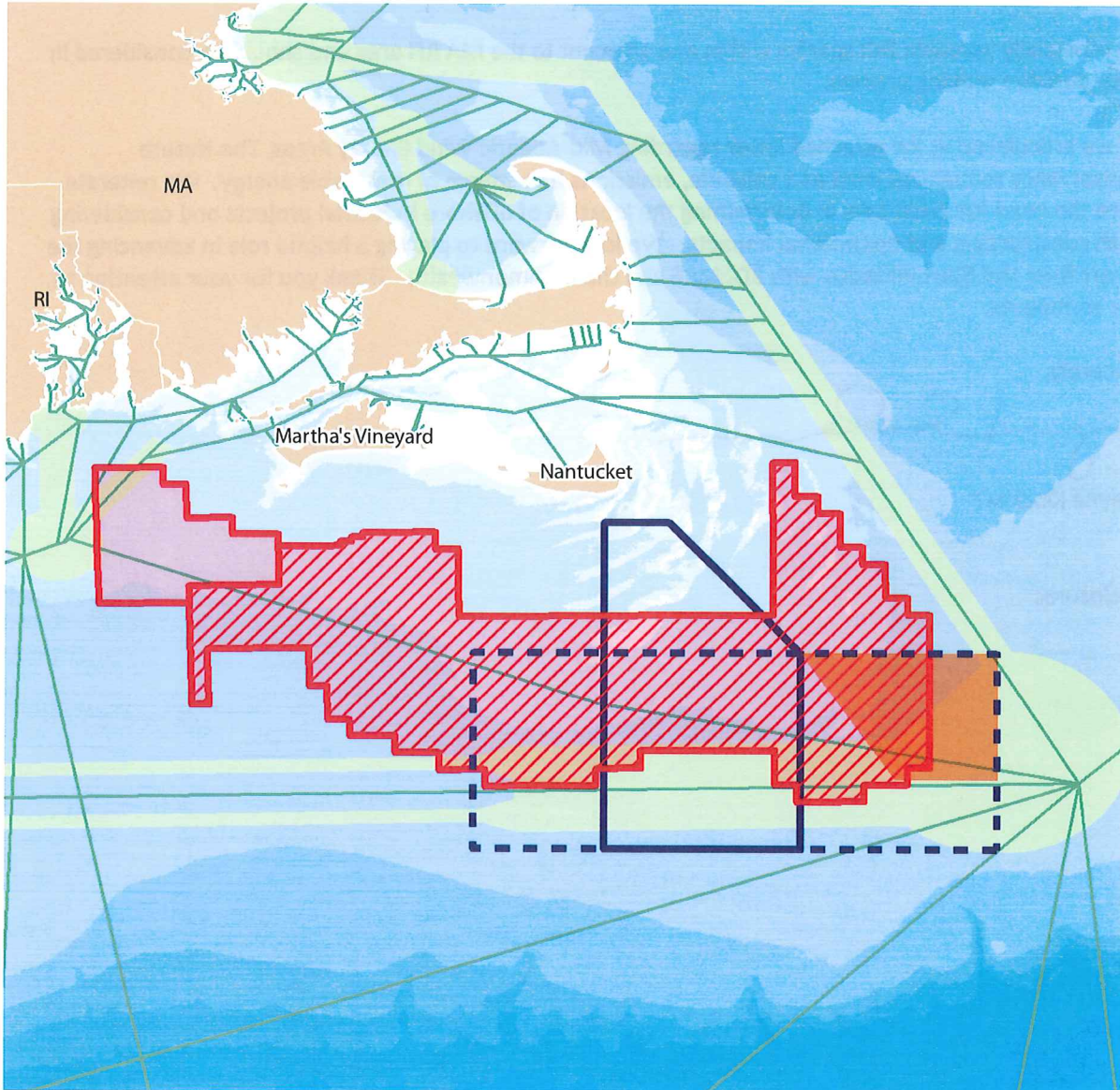
Sincerely,

A handwritten signature in black ink, appearing to read 'Wayne Klockner', with a long horizontal flourish extending to the right.

Wayne Klockner

| Enclosures

Map 1: Activities Around the Massachusetts RFI Area



April 13, 2011

-  Shipping Lanes
-  Fairways and Separation Zones
-  RI / MA Area of Mutual Interest
-  Massachusetts RFI Area
-  Nantucket Lightship Scallop Access Area
-  Nantucket Lightship Closed Area
-  Nantucket Lightship Habitat Closure Area

This map highlights the shipping lanes, fairways and traffic separation zones, and the various habitat closure and management areas that are near or overlap the proposed offshore wind area.

The RI / MA Area of Mutual Interest boundary is provide courtesy of the URI Environmental Data Center and is based on the federal OCS lease blocks.

The Massachusetts RFI Area boundary was downloaded from the Massachusetts CZM's online mapping tool on 3/22/2011 at <http://www.mass.gov/czm/mapping/index.htm>.

The Nantucket Lightship Scallop Access Area is created from the C.F.R. description on 3/27/2010 which can be found at <http://bit.ly/fnsbwV>.

The Nantucket Lightship Closed Area and Habitat Closure Area boundaries were downloaded from the Multipurpose Marine Cadastre at <http://www.marinecadastre.gov/default.aspx>.

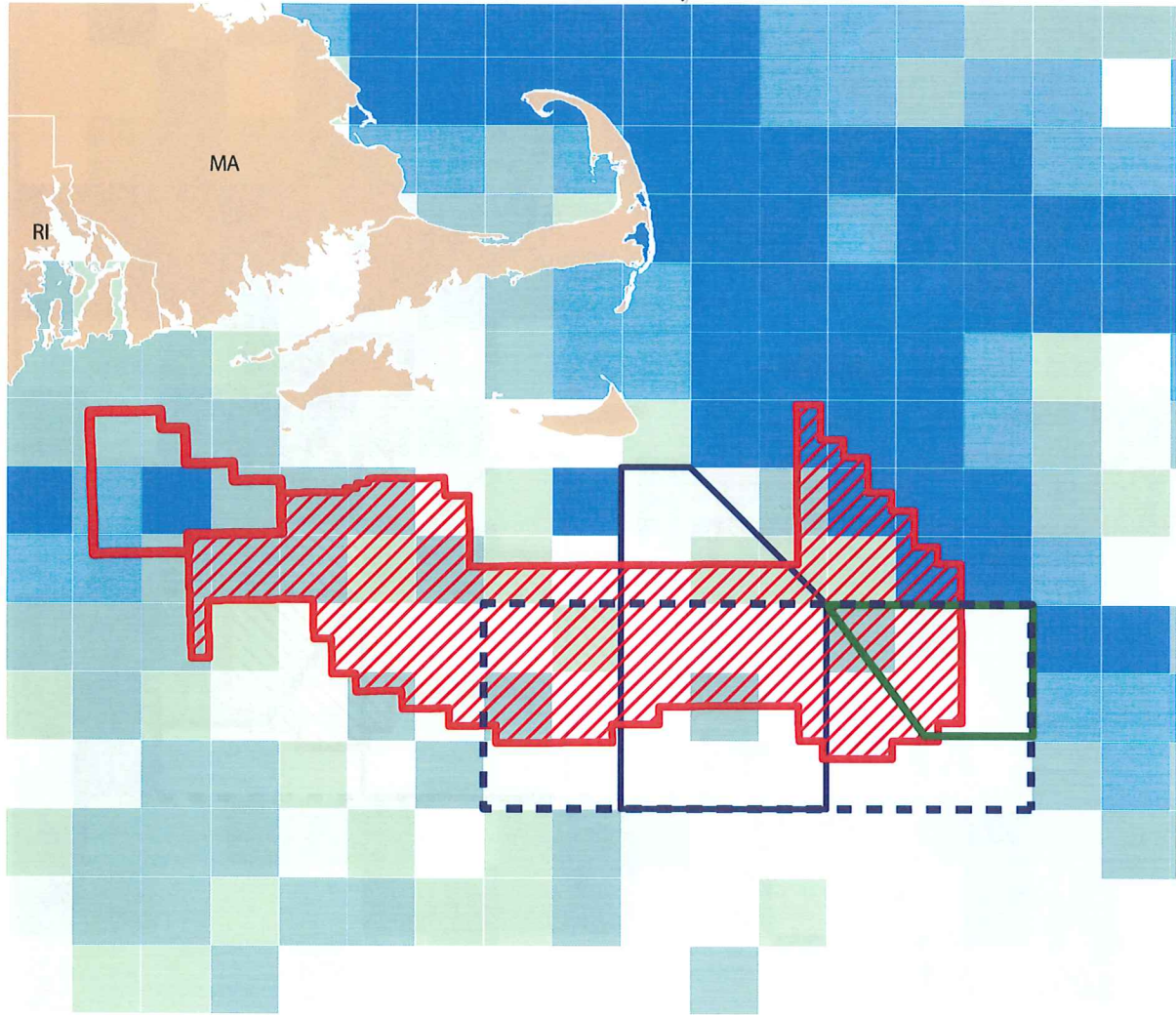
Fairways were provided by NOAA Coastal Services Center.

Shipping lanes are a part of the 2009 National Waterway Network which was created on behalf of the Bureau of Transportation Statistics the U.S. Army Corps of Engineers, the U.S. Bureau of Census, and the U.S. Coast Guard by Vanderbilt University and Oak Ridge National Laboratory. This dataset was downloaded on 12/15/2009.

The bathymetry data was compiled by TNC and is largely based on NOAA's Coastal Relief Model.



Map 2: Average Pounds of Cod Harvested Per Year, 2000 to 2009

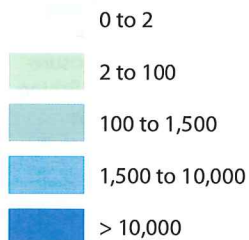


0 4.5 9 18 27 36 Nautical Miles

0 4.5 9 18 27 36 Miles

April 13, 2011

Average pounds of cod harvested



- RI / MA Area of Mutual Interest
- Massachusetts RFI Area
- Nantucket Lightship Scallop Access Area
- Nantucket Lightship Closed Area
- Nantucket Lightship Habitat Closure Area

This map shows the average pounds of cod harvested per year from 2000 to 2009 by ten minute square in relation to the proposed offshore wind area. These harvest values are based on the landed weight reported by seafood dealers contained in the vessel trip reports. These reports are required for each federally permitted fishing vessel. The Nantucket Lightship scallop access area, closed area, and habitat closure area boundaries are included to highlight areas where commercial fishing has been restricted for twenty years. These areas may not have high harvest yield, but they are important for the fisheries biological productivity.

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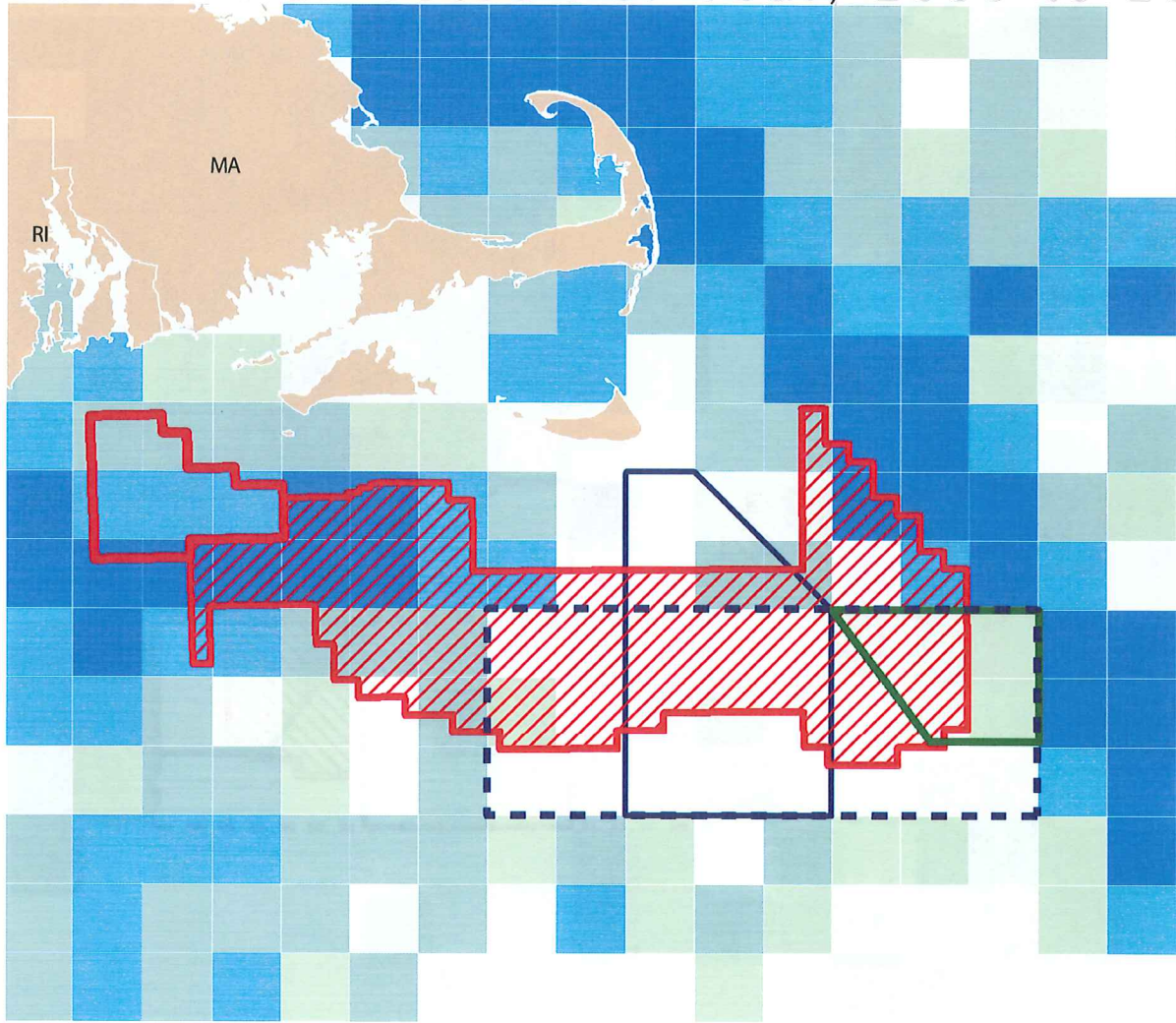
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Map 3: Average Pounds of Yellowtail Flounder Harvested Per Year, 2000 to 2009



April 13, 2011

Average pounds of yellowtail flounder harvested

- 0 to 2
- 2 to 100
- 100 to 800
- 800 to 5,000
- > 5,000

- RI / MA Area of Mutual Interest
- Massachusetts RFI Area
- Nantucket Lightship Scallop Access Area
- Nantucket Lightship Closed Area
- Nantucket Lightship Habitat Closure Area

This map shows the average pounds of yellowtail flounder harvested per year from 2000 to 2009 by ten minute square in relation to the proposed offshore wind area. These harvest values are based on the landed weight reported by seafood dealers contained in the vessel trip reports. These reports are required for each federally permitted fishing vessel. The Nantucket Lightship scallop access area, closed area, and habitat closure area boundaries are included to highlight areas where commercial fishing has been restricted for twenty years. These areas may not have high harvest yield, but they are important for the fisheries biological productivity.

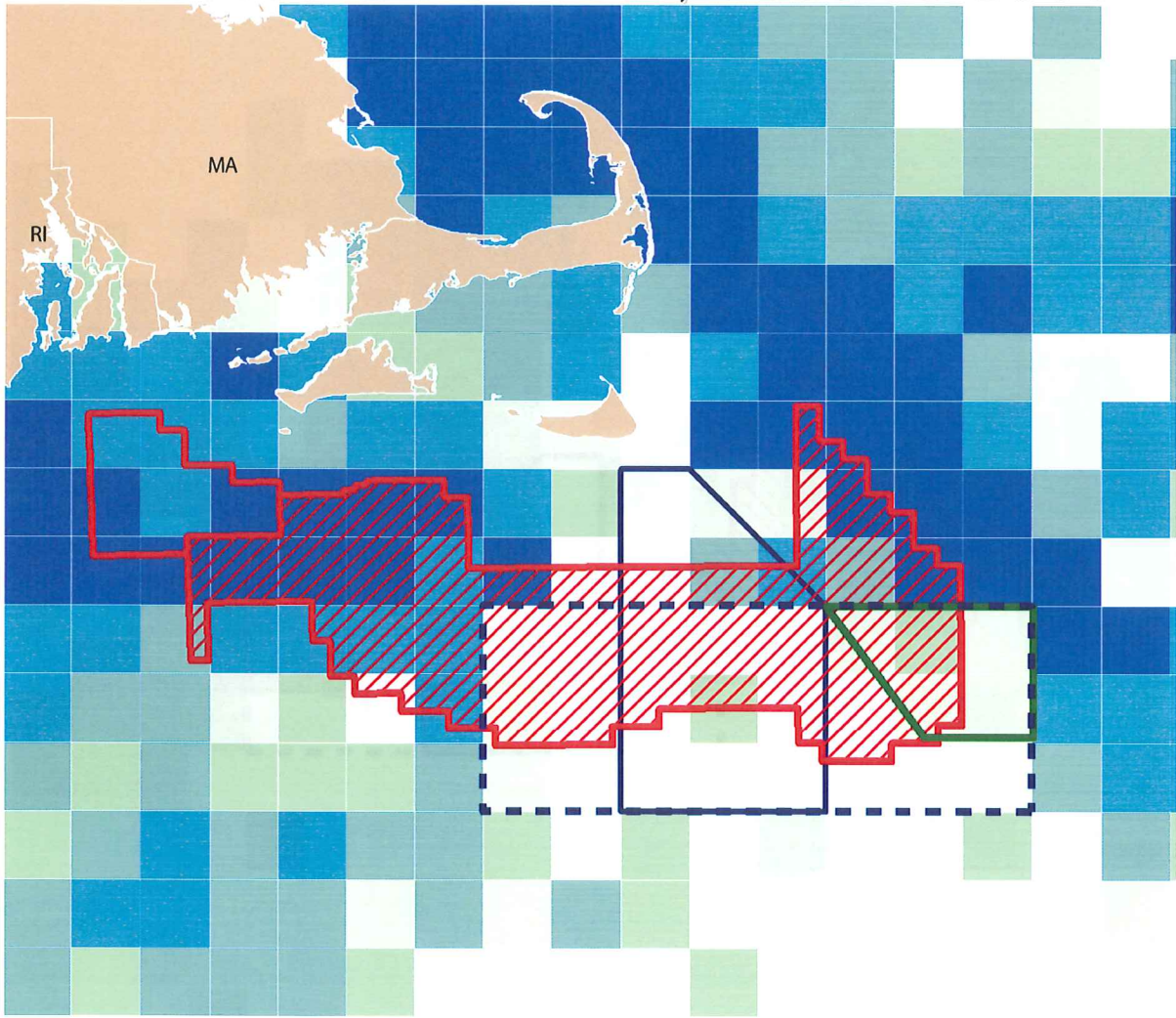
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The Nantucket Lightship Closed Area and Habitat Closure Area boundaries were downloaded from the Multipurpose Marine Cadastre at <http://www.marinecadastre.gov/default.aspx>.

Map 4: Average Pounds of Winter Flounder Harvested Per Year, 2000 to 2009

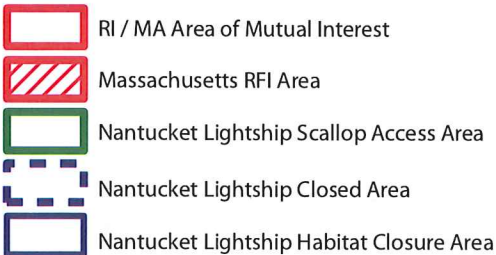
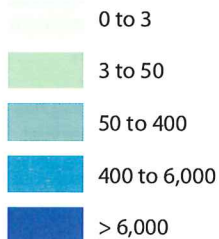


0 4.5 9 18 27 36 Nautical Miles

0 4.5 9 18 27 36 Miles

April 13, 2011

Average pounds of winter flounder harvested



This map shows the average pounds of winter flounder harvested per year from 2000 to 2009 by ten minute square in relation to the proposed offshore wind area. These harvest values are based on the landed weight reported by seafood dealers contained in the vessel trip reports. These reports are required for each federally permitted fishing vessel. The Nantucket Lightship scallop access area, closed area, and habitat closure area boundaries are included to highlight areas where commercial fishing has been restricted for twenty years. These areas may not have high harvest yield, but they are important for the fisheries biological productivity.

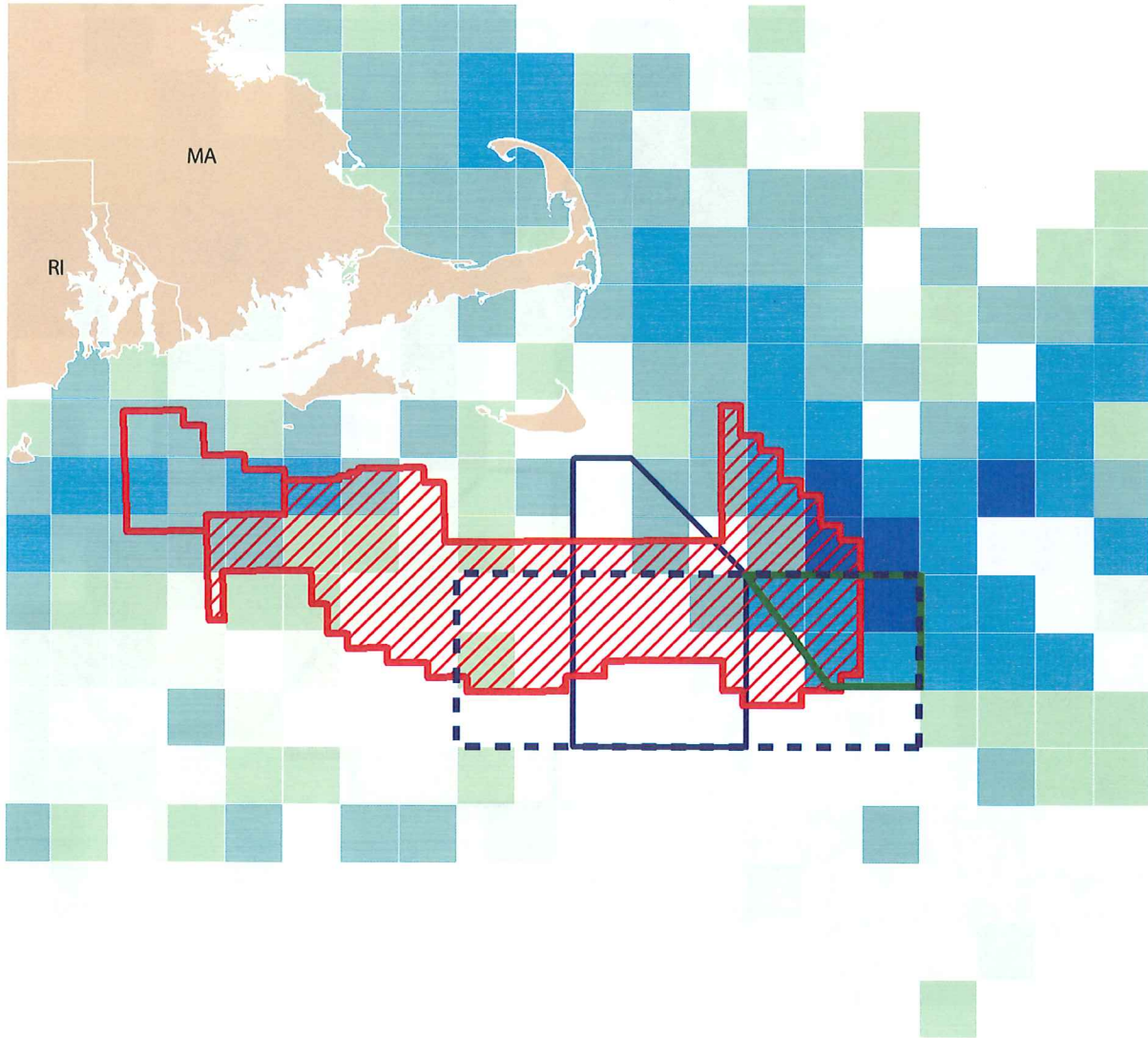
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Map 5: Average Pounds of Sea Scallop Harvested Per Year, 2000 to 2009

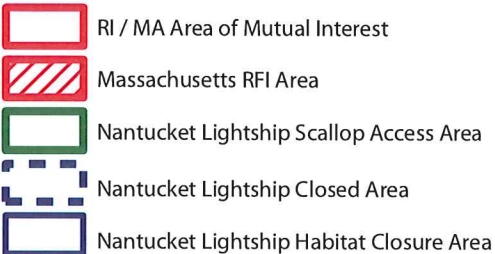
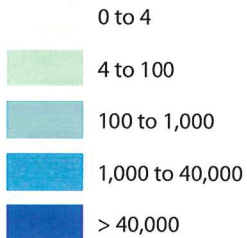


0 5 10 20 30 40 Nautical Miles

0 5 10 20 30 40 Miles

April 13, 2011

Average pounds of sea scallop harvested



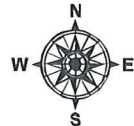
This map shows the average pounds of sea scallop harvested per year from 2000 to 2009 by ten minute square in relation to the proposed offshore wind area. These harvest values are based on the landed weight reported by seafood dealers contained in the vessel trip reports. These reports are required for each federally permitted fishing vessel. The Nantucket Lightship scallop access area, closed area, and habitat closure area boundaries are included to highlight areas where commercial fishing has been restricted for twenty years. These areas may not have high harvest yield, but they are important for the fisheries biological productivity.

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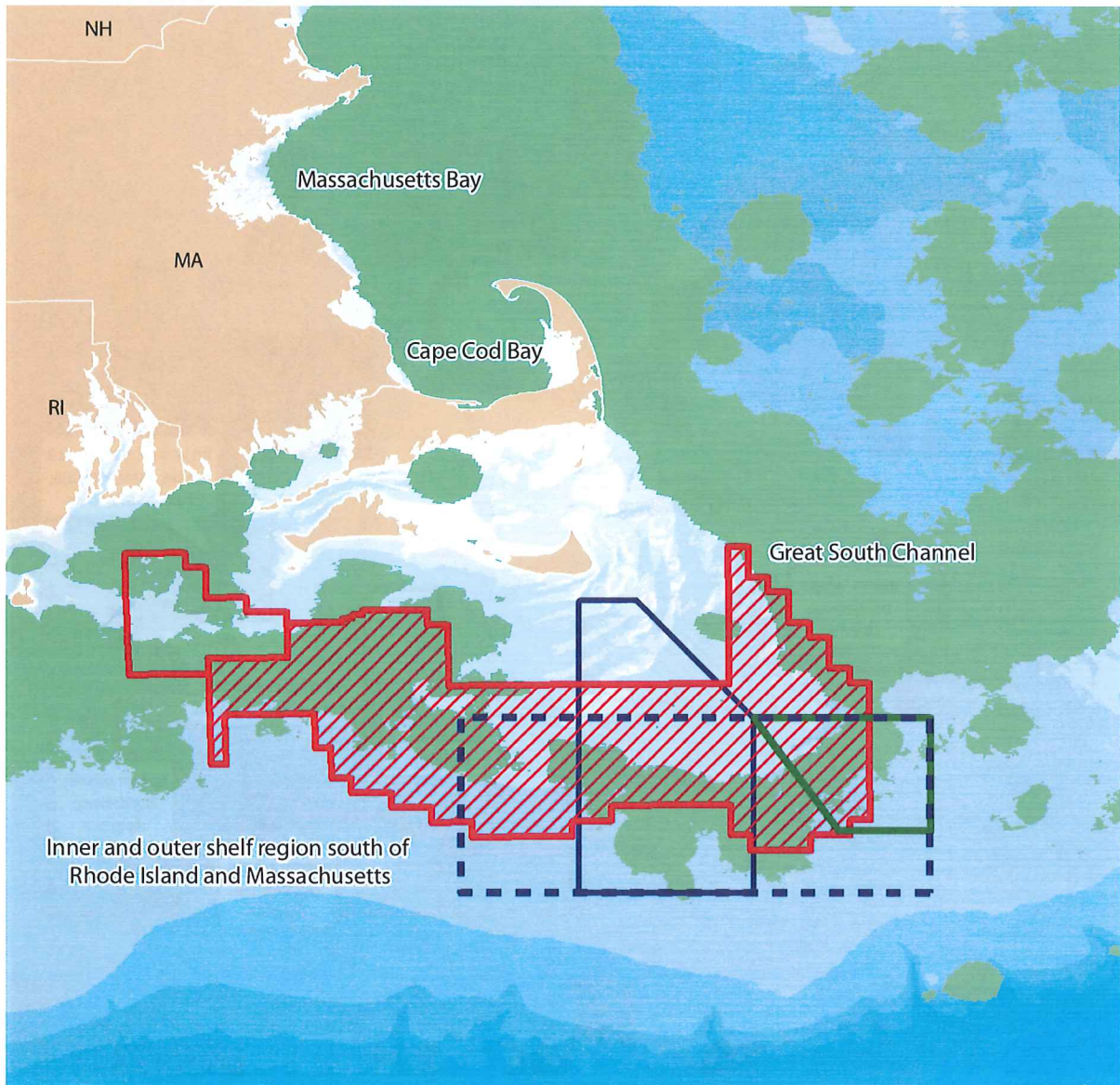
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Map 6: Important Seafloor Areas



April 13, 2011

-  Important seafloor areas
-  RI / MA Area of Mutual Interest
-  Massachusetts RFI Area
-  Nantucket Lightship Closed Area
-  Nantucket Lightship Habitat Closure Area

This map shows the important seafloor areas developed by TNC in relation to the proposed offshore wind area. These priority areas were identified based on the presence, abundance, and persistence of six characteristics: persistence of demersal fish species, diverse demersal fish communities, corals and canyons, hard bottoms, seagrass, and benthic habitats.

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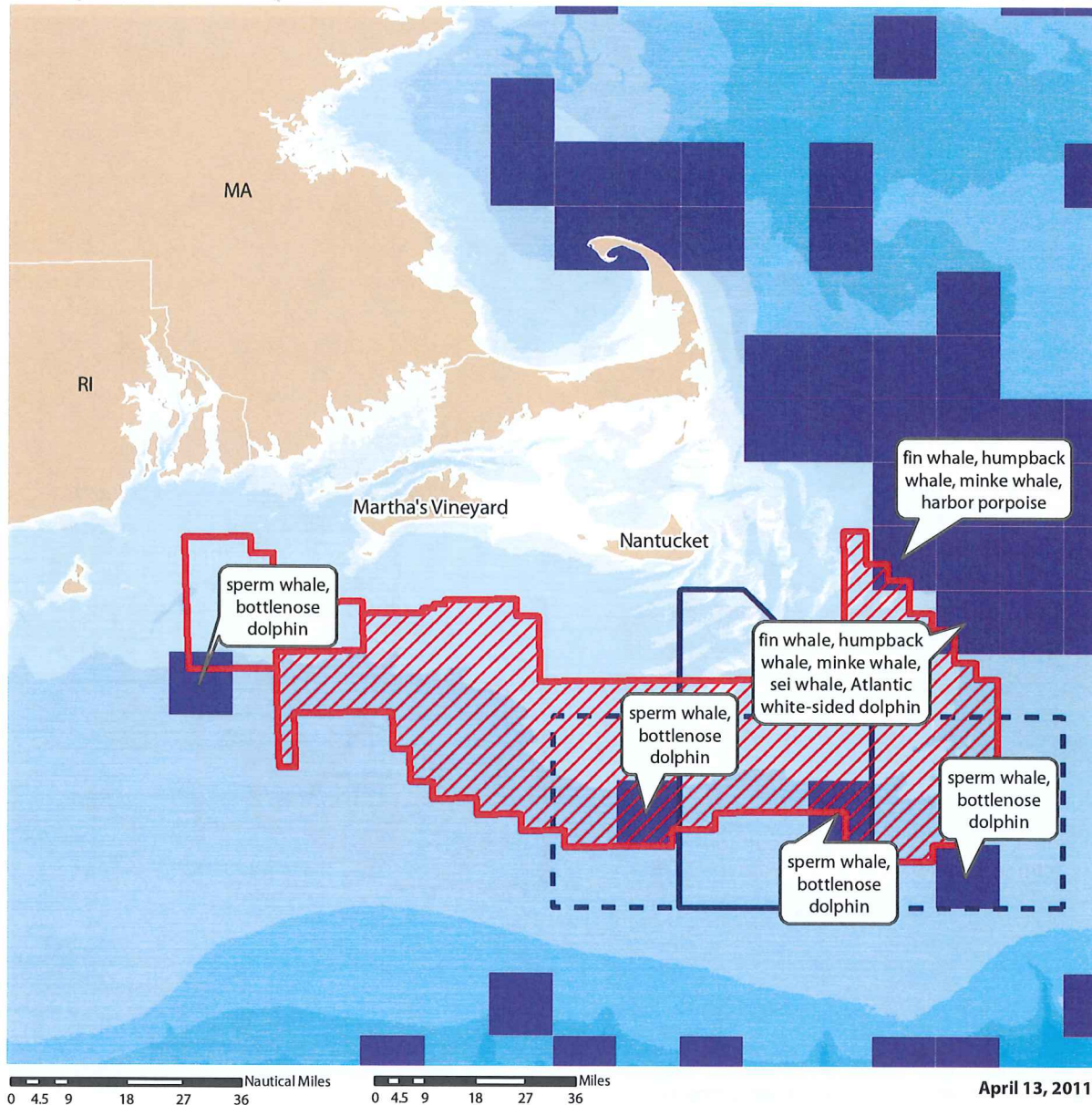
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The bathymetry data was compiled by TNC and is largely based on NOAA's Coastal Relief Model.



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Map 7: Important Marine Mammal Areas



-  Important marine mammal areas
-  RI / MA Area of Mutual Interest
-  Massachusetts RFI Area
-  Nantucket Lightship Closed Area
-  Nantucket Lightship Habitat Closure Area

This map shows important marine mammal areas that were developed by TNC in relation to the proposed offshore wind area. The ten minute squares highlighted as important indicate locations where two or more mammal species were observed at least two standard deviations above the mean. These areas were identified through the use of effort-corrected seasonal sightings data collected by the U.S. Navy from 1979 to 2003.

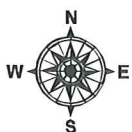
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