

**All Our Energy • The Connecticut Audubon Society • Defenders of Wildlife •
Environmental Defense Center • Mass Audubon • National Audubon Society •
National Wildlife Federation • Natural Resources Defense Council • NY4WHALES • Ocean Conservancy
• Oceana • Seatuck Environmental Association • Southern Environmental Law Center •
Surfrider Foundation • Whale and Dolphin Conservation**

Identification of New Areas for Offshore Wind Leasing

Our organizations strongly support the responsible development of offshore wind energy as a key to the critical transition away from harmful fossil fuels to a clean energy economy. Offshore wind power provides a tremendous opportunity to fight climate change, reduce local and regional air and water pollution, and grow a new industry that supports thousands of well-paying, union jobs. While the need for this transition is only becoming more urgent, we can and must ensure that all U.S. offshore wind projects are sited, developed, operated, and decommissioned responsibly. Responsible leasing and permitting of offshore wind energy: (i) avoids, minimizes, mitigates, and monitors adverse impacts on marine and coastal wildlife and their habitats; (ii) reduces negative impacts on other ocean uses; (iii) includes robust consultation with Native American tribes and communities; (iv) meaningfully engages state and local governments and stakeholders from the outset; and (v) uses the best available scientific and technological data to ensure science-based and stakeholder-informed decision making.

The following practices are needed to help the offshore wind industry advance expeditiously, with minimal environmental and stakeholder conflicts, to successfully achieve the administration's offshore wind goals. Our organizations call on the Bureau of Ocean Energy Management to follow these recommendations to responsibly identify and lease Wind Energy Areas:

- Establish policies and procedures for meaningful co-planning and consultations with Native American tribes, both federally and non-federally recognized, and Native Hawaiian Organizations.
- Employ a multi-state or regional level planning approach, where applicable. Often actions offshore of one state impact ocean users beyond a state's boundaries.
- Fully engage tribes and regional stakeholders early (i.e., before Call Area identification) and throughout the offshore wind siting, leasing, and permitting processes. Stakeholders include conservation groups, various sectors of the commercial and recreational fishing industries, wind developers, academia, maritime industry, labor groups, and impacted communities, as well as state and local governments.
 - Ensure an open exchange with federal and state officials beyond formal public meetings, including sector-specific and tribal-specific meetings where specific topics, data, and information can be discussed in greater detail. Meetings should occur at times and

places that are convenient for stakeholders. Next steps and opportunities to provide input should be clearly communicated.

- Provide funding for tribes, states, and communities, as needed, to facilitate an inclusive process.
- At the lease identification stage, it is important to identify potential transmission landing sites and encourage engagement from potentially impacted communities.
- Ensure early participation and data sharing from all relevant federal (e.g., National Oceanic and Atmospheric Administration, U.S. Coast Guard, Department of Defense) and state agencies, to improve coordination during all phases of planning, leasing, and development, including pre-planning discussions, to resolve potential conflicts upfront.
- Use the best available science and Indigenous traditional knowledge to inform siting decisions and be data-driven, transparent, and inclusive of the interests of stakeholders and all levels of government (tribal, federal, state, local).
 - Develop, resource, and use publicly available decision-support tools, like the Northeast and Mid-Atlantic Ocean Data Portals, the California Offshore Wind Energy Gateway, and the Oregon ORO Wind Map, that allow users to easily navigate, overlay, and interpret multiple environmental and ocean use data layers. Provide data sources that are reflective of government and stakeholders' stated interests.
 - Analyze environmental and social spatial data to identify areas having optimum offshore wind energy potential with the least environmental and social impacts.
 - Data products should clearly convey how they were compiled and with what data, and they should acknowledge uncertainties and existing gaps in knowledge.
 - Be transparent about the specific environmental considerations (e.g., benthic habitat, marine mammal and bird and bat presence and abundance) used to inform area designations.
- Avoid and minimize adverse impacts on marine and coastal habitats and the wildlife that rely on them.
 - Adopt the "mitigation hierarchy" to first avoid, then minimize, and mitigate, potential environmental impacts from all stages of offshore wind development.
 - Leasing should not advance in areas within the boundaries of the National Park System, National Wildlife Refuge System, National Marine Sanctuary System, or any National Monument.

- Identify and map any persistent hotspots of species abundance and/or areas of rare environmental significance, which include, but are not limited to, state Marine Protected Areas and critical breeding and feeding habitats for wildlife like Audubon Marine Important Bird Areas, Cetacean Density and Distribution Mapping Biologically Important Areas, critical habitat for Endangered Species Act-listed species, Essential Fish Habitat Conservation Areas, Habitat Management Areas, Habitat Areas of Particular Concern, and regionally relevant areas. First prioritize avoidance of these areas, as per the mitigation hierarchy.

- An environmental assessment of the proposed lease areas should be conducted in advance of an area lease sale, even if the area is determined to be a non-competitive lease sale location.