



**NATIONAL WILDLIFE FEDERATION®**

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March 18, 2011

Wilma A. Lewis,  
Assistant Secretary for Land and Minerals Management  
U.S. Department of the Interior  
1849 C Street, NW  
Washington, DC 20240

*Filed electronically via [www.regulations.gov](http://www.regulations.gov)*

**Re: Comments on “Acquire a Lease Noncompetitively, 1010-AD71”  
Docket ID: BOEM-2010-0045**

Dear Ms. Lewis:

These comments are submitted on behalf of the National Wildlife Federation (NWF). Thank you for the opportunity to provide comments on the Bureau of Ocean Energy Management, Regulations and Enforcement’s (BOEMRE’s) proposal to revise the Part 285 regulations governing the evaluation of competitive interest in areas proposed for renewable energy leasing on the outer continental shelf (OCS). NWF is submitting these comments today via electronic mail.

As an organization, NWF represents the power and commitment of four million members and supporters joined by affiliated organizations in 47 states and territories and the District of Columbia. NWF and its affiliates have a long history of working to conserve wildlife and wild places. NWF also recognizes that climate change poses an enormous threat to both the human environment and the earth’s biologic diversity. For that reason, NWF has called for a rapid transition to energy sources other than fossil fuels that contribute to greenhouse gas (GHG) emissions and climate change. The generation of electricity via utility-scale offshore wind energy is an important component of that transition. Without immediate and decisive steps to curb GHG emissions, the long-term survival of many wildlife species is in jeopardy. Nevertheless, it is crucial that BOEMRE commit to avoiding sensitive wildlife habitats in siting offshore wind energy development activities.

BOEMRE proposes to eliminate an unnecessary step in the procedures it uses to assess competitive interest when the agency initiates the leasing process by issuing a request for interest or call for information and nominations. NWF strongly supports the proposed regulatory change.

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Under the existing Part 285 regulations, when BOEMRE initiates the leasing process and there is not competitive interest, the agency must publish a second notice to potentially interested parties before proceeding with the noncompetitive leasing process. NWF believes it is unnecessary to require a second notice, as legitimate offshore wind developers with the necessary capacity to construct and operate offshore energy generation facilities will express interest during the initial response period.

NWF agrees with BOEMRE's proposal to revise its procedures for assessing competitive interest. The proposed regulatory change does not pose a risk to wildlife, habitat, or other ocean resources, and would provide sufficient opportunity for interested parties to file comments regarding needed environmental analysis. The proposed regulatory change could substantially reduce the development timeline, creating more certainty for habitat-friendly offshore wind projects.

NWF appreciates the opportunity to submit these comments on the proposed rule and BOEMRE's continued efforts to advance policy to promote U.S. offshore wind development and wildlife-friendly siting decisions.

Sincerely,

Justin Allegro  
Manager  
Renewable Energy and Wildlife Program