

August 17, 2022

Ms. Tershara Matthews
Bureau of Ocean Energy Management
Office of Emerging Programs
1201 Elmwood Park Blvd.
New Orleans, LA 70123-2394

Re: Houston Audubon Society Comments to Draft Environmental Assessment for Commercial and Research Wind Lease and Grant Issuance and Site Assessment Activities on the Outer Continental Shelf of the Gulf of Mexico, BOEM-2021-0092.

Dear Ms. Matthews:

Houston Audubon Society is a 501-C3 organization established in 1969 to protect birds and their habitats and to provide public education and outreach on matters affecting birds and bird conservation on the upper Texas coast. Thank you for the opportunity to comment on the above referenced Environmental Assessment (EA).

Based on our review of the Environmental Assessment (EA) related to the two proposed Wind Energy Areas (WEAs) in the Gulf of Mexico, insufficient data and analysis were provided to make sound scientific-based comments or decisions regarding the proposed sites. The current EA does not adequately address the potential impacts to trans-Gulf and circum-Gulf migrant birds that depend on safe passage through the region. Notable factors to be considered as part of the decision-making process regarding WEAs include the average altitude that birds fly over the proposed area, and how that may vary with weather condition. The influence of time of year on migratory bird flight patterns over these areas should also be assessed. Results of such analyses will better inform site selection and potential operational procedures that could be employed to limit impacts. With this in mind, we request a more detailed analysis of bird migration patterns addressing these factors be completed as well as assessments of alternative strategies that could be employed. Examples of design and operational adjustments that could be considered include changing the height of the turbines or turning the turbines off during peak migration periods in the spring and fall.

We recognize the need to deliver renewable energy options as soon as possible, but doing so without sufficient data and analysis could result in a poorly designed project with unintentional but significant impacts to bird populations, the ecological services they provide, and the nature-based economy that they support in Texas. In Texas, 4.4 million people participated in wildlife watching activities, 95% of which is directly linked to birding. Wildlife watching activities injected \$1.8 billion into the Texas economy. As one of the top birding locations in the United States, Houston area bird tourism attracts tens of thousands of tourists each year. According to a 2011 U.S. Department of the Interior report, birding activities nationally contribute a billion dollars to the economy with an overall total economic benefit of \$41 billion in the United States. These participation and economic benefit numbers have likely increased with the rise in birding as a hobby during the COVID-19 pandemic.

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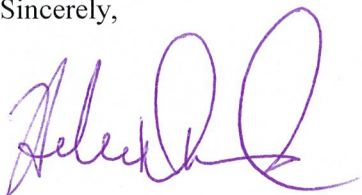
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We applaud the Bureau of Ocean Energy Management (BOEM) efforts to support renewable energy through development of Wind Energy Areas and encourage BOEM to take the necessary steps that will provide the information needed to make the most informed decisions regarding site selection, construction design, and operational processes to limit impacts to birds.

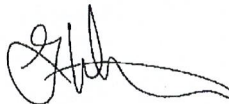
Please feel free to contact Helen Drummond, Executive Director, with any questions at hdrummond@houstonaudubon.org.

Sincerely,



Helen E. Drummond
Executive Director

Sincerely,



Greg Whittaker
President