



The Village of Bald Head Island

February 23, 2015

Filed electronically at:

<http://www.boem.gov/About-BOEM/Public-Engagement/Public-Engagement-Opportunities.aspx>

Delivered VIA Certified Mail (Return Receipt Requested) to:

James F. Bennett, Manager
Office of Renewable Energy Programs
Bureau of Ocean Energy Management
381 Elden Street, HM 1328
Herndon, Virginia 20170-4817

SUBJECT: Comments on Environmental Assessment for Commercial Wind Lease
Issuance and Site Assessment Activities Offshore North Carolina and
Request for 60-day Extension of Comment Period

Dear Mr. Bennett:

The Village of Bald Head Island, North Carolina (the “Village”) offers the following comments on the Bureau of Ocean Energy Management Environmental Assessment for Commercial Wind Lease Issuance and Site Assessment Activities Offshore North Carolina (“EA”).

Extension of Comment Period

Given the magnitude and permanence of the impacts that will flow from the BOEM decision addressed by the EA, the Village believes an extension of the comment period is important for our citizens. The complexity of the BOEM process warrants an extension of at least 60 days.

Impact on Village of Bald Head Island

The BOEM decisions addressed by the EA and the ultimate visual impact that will flow from the decisions will heavily impact our community. Adverse visual impacts are especially important to the Village and its economy. Bald Head Island is accessible only by ferry and is intentionally and specially positioned as a remote and picturesque

community where tourists and residents can enjoy beautiful, natural, scenic vistas. The visual resources provided by our viewshed is an essential driver of our economy. For example, Bald Head Island is a special and popular destination for bird-watchers, who appreciate both the presence of numerous avian species and the ability to observe them in a natural and scenic setting. The privacy, intimacy, and natural coastal beauty that the Village offers are crucial to the Village. These crucial characteristics will be significantly, negatively impacted if BOEM issues leases and approves site assessment activities in the WEA at sites that are within viewing distance of Bald Head Island. The only lawful conclusion is that the proposed BOEM actions constitute a major federal action with significant impacts on the quality of the human environment. An EIS is required.

Furthermore, there were no nighttime visual impact simulations done with respect to Bald Head Island. As more fully described in the comment submitted to the Bureau by the Bald Head Association (BHA), the Village places special value on providing a naturally dark environment for its residents and visitors, maintained in part by restrictive lighting ordinances. The Village is concerned that this unique aspect of its character was not even considered in the EA.

Flawed Alternatives Analysis

It is apparent to the Village that the EA's alternatives analysis is fundamentally flawed. The EA excludes consideration of sites that are outside the WEA, without deciding whether such sites are reasonable alternatives. What if there is a reasonable alternative location outside the WEA and outside the Bald Head Island viewshed? Based on the EA as published, BOEM will not know. The Village will not know. The public will not know.

While the Village recognizes that the Bureau intends to conduct further analysis and produce Environmental Impact Statements (EIS) before allowing construction to proceed, the failure to more fully consider the impact of turbine construction before the issuance of leases on specific OCS blocks will deprive the Bureau and the public sufficient opportunity to consider – and if necessary, change – the location of the Wind Energy Areas (WEAs) and specific OCS blocks within and outside those areas.

Inadequate consideration of impacts

The EA has not adequately identified or considered the adverse effects of its actions on the Village of Bald Head Island. The EA does not take into account the special reliance of the Village on its viewshed.

Further, the EA fails to adequately analyze the secondary and cumulative impacts of the leasing and SAP approval decisions. The BOEM decisions contemplated by the EA will essentially guarantee that the adverse visual impacts of wind turbine facilities will occur within the WEA and will impact the Village.

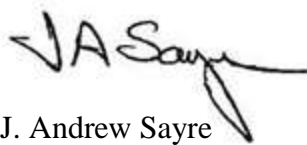
February 23, 2015

The Village's concerns include concerns about the adverse visual impacts of the Wilmington East and Wilmington West WEAs, including nighttime visual impacts. The EA only analyzes in any detail the visual impact from the buoys and towers involved in site assessment activities, not the eventual visual impact from the construction of turbines and nighttime operations. If the Bureau proceeds with leasing the OCS blocks within the WEAs based on the EA, it will be difficult if not outright impossible to move the WEAs further from shore if a later EA or EIS determines that the visual impact on sea-facing communities is problematic.

The piecemeal approach taken in the EA ignores the connection between leasing and site assessment and the ultimate impact of turbine construction and operation. If BOEM relies on the EA as drafted, it will make decisions on issuance of leases before required assessment has been completed. For example, the eventual construction of turbines will require analysis of the feasibility of connecting the energy generated to the local energy infrastructure, the impact on the sensitive environmental ecosystems in the Wilmington area, and the full impact on local economies. Selecting – and potentially leasing – the locations for the WEAs and OCS blocks before those and other factors are considered could mean that more practical and advantageous locations are foreclosed too early in the process.

In conclusion, we request an extension of the comment period, we request a decision by BOEM that the EA is not adequate as drafted, and we request a determination by BOEM that the decisions contemplated by the EA constitute a major federal action with significant impacts on the quality of the human environment that require an EIS.

Respectfully,



J. Andrew Sayre
Mayor

pc: Bald Head Association
Bald Head Island Stage II Association
Brooks, Pierce, McLendon, Humphrey & Leonard, LLP