



28 June 2022

Attn:

Ms. Bridgette Duplantis  
Bureau of Ocean Energy Management  
Office of Leasing and Plans  
1201 Elmwood Park Boulevard  
New Orleans, Louisiana 70123

Re: Letter from the International Black-capped Petrel Conservation Group concerning commercial leasing for wind power development on the Central Atlantic Outer Continental Shelf

Dear Ms. Duplantis,

Thank you for the opportunity to comment on commercial leasing for wind power development on the Central Atlantic Outer Continental Shelf.

**The [International Black-capped Petrel Conservation Group](#) is a collaborative association of organizations and individuals with a shared interest in the conservation of the Black-capped Petrel across its range.** In order to secure the long-term viability of the species, we are committed to engage with diverse stakeholders; to find, conserve, and restore breeding populations in the species' range by addressing key threats on land and at sea; to support the co-existence of Black-capped Petrels and people in surrounding communities; and to use the best science and methods available to advance adaptive, participative, and equitable results-based management.

**The Diabloteín Black-capped Petrel *Pterodroma hasitata* is a globally endangered pelagic seabird nesting in the Caribbean and utilizing the western North Atlantic Ocean during all parts of its annual cycle** (Simons et al. 2013, Jodice et al. 2015). The species also occurs in the Caribbean Sea and Gulf of Mexico (Jodice et al. 2015, Jodice et al. 2021). The species is considered Endangered throughout its range (BirdLife International 2018) and is being considered by the U.S. Fish and Wildlife Service for listing as Threatened under the Endangered Species Act (U.S. Fish and Wildlife Service 2018). Breeding populations are fragmented into five distinct breeding areas on the island of Hispaniola, with suspected additional breeding areas in Dominica and Cuba (Wheeler et al. 2021). To date, only ca. 100 nests have been located (Wheeler et al. 2021), all on Hispaniola. Two color forms have been described (dark and light, with intermediate phenotypes, Howell and Patteson 2008).

To help BOEM refine its call areas on the Central Atlantic Outer Continental Shelf (CAOCS) and better integrate this globally endangered species in its decision, we (1) share our specific concerns about the CAOCS call areas, and (2) provide recommendations for a better integration of the Black-capped Petrel.

### **1) Concerns about Central Atlantic Outer Continental Shelf call areas**

Using tracking data from 10 Black-capped Petrels captured at sea off Cape Hatteras, Satgé et al. (2022) confirm the use of the western North Atlantic for the major part of the species' annual cycle. They write that: *“The dark form occupies pelagic Carolinian waters of the South Atlantic Bight and is concentrated within a ~ 200-km strip of waters extending eastward from the continental shelf into the Gulf Stream; the light form occupies pelagic Virginian waters of the Middle Atlantic Bight, extending over a wider area between the continental shelf and the northern edge of the Gulf Stream”*(LL 499-503). In particular, these areas both overlap with CAOCS call areas E and F. Of 10 individual petrels tracked by satellite, five were present in CAOCS call areas E and six in call area F. Three petrels were present in both areas (LL 442-445). Additionally, although the two color forms appear to be distinctly distributed, the core areas of tracked individuals (the areas where most activity was recorded) overlapped with CAOCS call areas E and F (Figure 2 and Figure S11 in Satgé et al. 2022). More than 95% of call areas E and F were inside the home ranges of both color forms (Table S4 in Satgé et al. 2022).

In addition, other publicly available datasets also show the presence of Black-capped Petrels in CAOCS call areas E and F: Jodice et al. (2015), Sussman and U.S. Geological Survey (2014), and eBird (2022) (Figure 1 in this letter).

Existing offshore lease areas for wind energy are present off the eastern U.S. coast but they are in nearshore waters of the continental shelf. Areas E and F proposed in the CAOCS call are the first to be located on the outer continental rise and to overlap directly with use areas by pelagic marine life. In particular, this proposed expansion into deeper, open ocean waters can affect the Black-capped Petrel, which shows the highest population sensitivity to offshore wind facilities among avian species in the U.S. Atlantic OCS, and a high sensitivity to the impacts of collision (ranked 11 of 40 pelagic seabird species) and displacement (ranked 7 of 40 pelagic seabird species) (Robinson Willmott et al. 2013).

Like in other nocturnal Procellariiformes, attraction and disorientation by artificial lights is a documented threat in Black-capped Petrels (Simons et al. 2013, Rodríguez et al. 2019, Wheeler et al. 2021): therefore, Black-capped Petrels can be directly affected through attraction/disorientation/collision with lighted vessels during the construction phase. In addition, Black-capped Petrels fly at altitudes ranging from the sea surface to 100 m above sea level (Haney 1987) and can, therefore, be directly affected through collision with blades during the production phase. Moreover, Black-capped Petrels can indirectly be affected by activities related to the production of wind energy through displacement from high use foraging areas during all phases of exploitation.

### **2) Recommendations for a better integration of the Black-capped Petrel into wind energy decisions**

As the leasing process for offshore wind moves forward in the CAOCS, we urge BOEM to take the Black-capped Petrel into consideration when designating lease areas. The most direct approach would be

to review the footprint of CAOCS lease areas E and F to minimize overlap with high use foraging areas of Black-capped Petrels outlined in Satgé et al. (2022). We also suggest that BOEM use all available data (including, but not limited to, individual-based tracking, systematic marine surveys, and observations by citizen scientists) to locate hotspots of Black-capped Petrel activity in the area and prevent additional overlap.

In addition, we suggest that environmental impact assessments and environmental assessments of wind energy as it relates to Black-capped Petrels can only be relevant if important knowledge gaps pertaining to the size of the global population, marine use in the western North Atlantic and Gulf of Mexico, and connectivity between marine areas and nesting areas are filled. It is also necessary to assess the scale and population impact of displacements caused by wind energy production, and the seasonality of exposure to wind energy production.

Furthermore, if displacement and/or mortality is observed or suspected, BOEM should prioritize mitigating or offsetting the impacts of threats affecting Black-capped Petrel on land. These include (but are not limited to) predation by introduced mammalian predators, fire mortality, collision with infrastructure, and habitat destruction (Wheeler et al. 2021).

The Black-capped Petrel is only the endangered seabird species that is present in the CAOCS for most of the year (Robinson Willmott et al. 2013). **Given the overlap between CAOCS lease areas E and F and high use areas, we respectfully urge BOEM to prioritize the conservation of the Black-capped Petrel by (1) limiting the encroachment of wind energy areas into use areas, and (2) supporting additional research to fill important knowledge gaps.**

We remain at your disposal to answer questions or provide additional information on the Black-capped Petrel.

Sincerely,

- Jennifer Wheeler, Chair, International Black-capped Petrel Conservation Group, BirdsCaribbean, Natick, MA, USA
- Yvan Satgé, Research Associate, Clemson University, Clemson, SC, USA
- Brad Keitt, American Bird Conservancy, Washington, DC, USA
- Adam Brown, Environmental Protection in the Caribbean, Green Cove Springs, FL, USA
- John Gerwin, Research Curator, Ornithology, NC Museum of Natural Sciences, Raleigh, NC, USA
- Chris Rimmer, Executive Director, Vermont Center for Ecostudies, Norwich, VT, USA
- James Goetz, Research Associate, Vermont Center for Ecostudies, Norwich, VT, USA
- J. Christopher Haney, Terra Mar Applied Sciences, LLC, Washington, DC, USA
- Anthony Levesque, AMAZONA, Guadeloupe, France
- Ruud van Halewijn, Seabird biologist (retired), The Netherlands

These comments were prepared by Yvan Satgé, Research Associate, Clemson University, Clemson, SC 29634, USA. For questions or remarks about this letter, please contact Mr. Satgé at [ysatge@clemson.edu](mailto:ysatge@clemson.edu).

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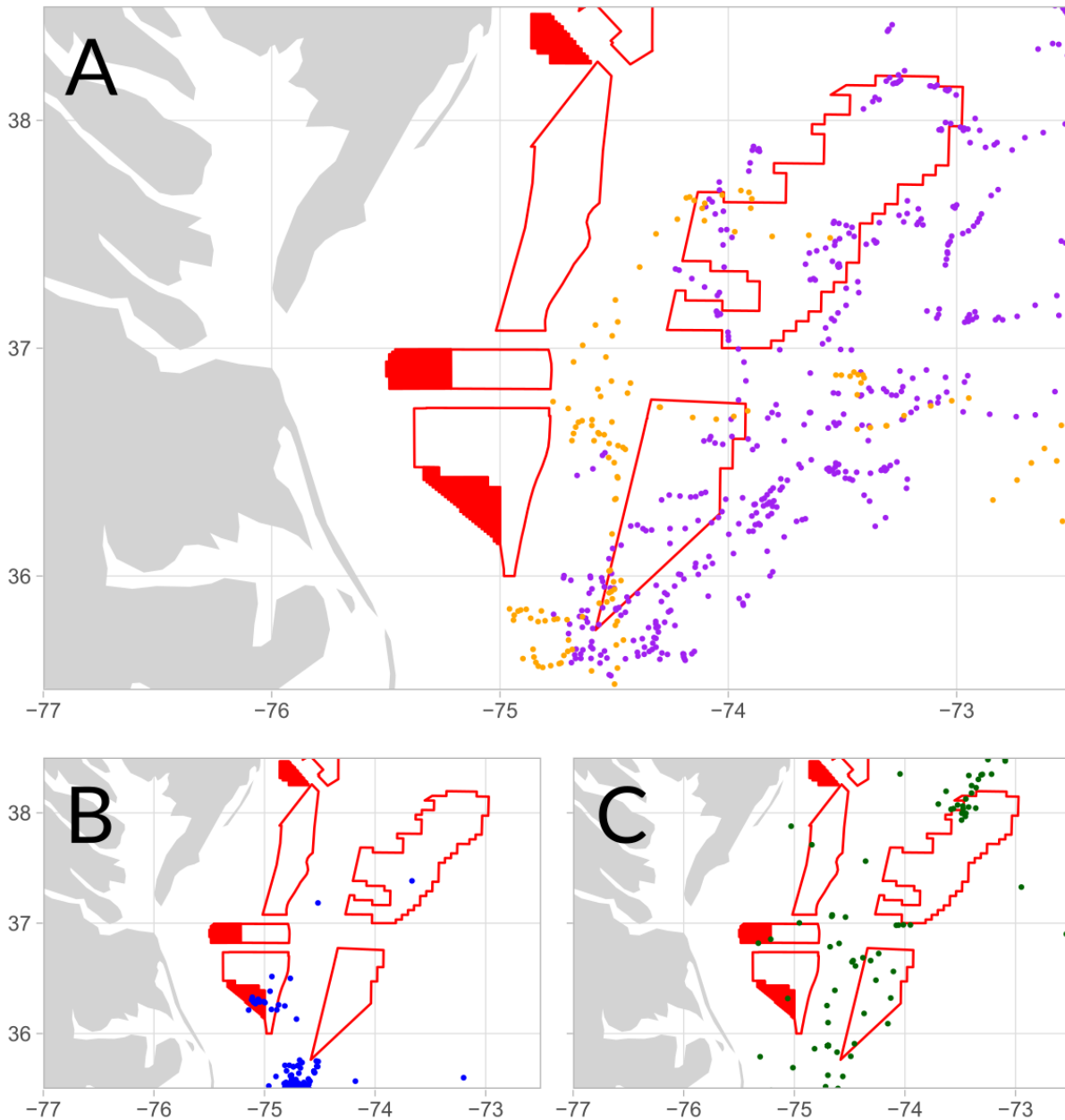


Figure 1. Overlap between Central Atlantic offshore wind areas and Black-capped Petrel records. A) Locations of individual-based satellite tracking: orange: Jodice et al. (2015); purple: Satgé et al. (2022). B) Observation records in Sussman and U.S. Geological Survey (2014). C) Observation records in eBird (2022). Red-filled polygons indicate the location of active leases, and red-outlined polygons indicate proposed lease areas on the Central Atlantic Outer Continental Shelf. These maps are spatial representations of tracking and observation records with inherent limitations: we refer to the original references for discussions of these limitations.