



March 8, 2023

Partners:

350 Massachusetts
350 New Hampshire
Acadia Center
Advanced Energy United
The Alliance for Business Leadership
Association to Preserve Cape Cod
Black Economic Council of MA
BlueGreen Alliance
Bristol Community College
Business Network for Offshore Wind
Ceres
Clean Energy NH
Clean Water Action
CT League of Conservation Voters
Elders Climate Action - MA
Environmental League of MA
Environment America
Green Energy Consumers Alliance
Health Care Without Harm
IBEW Local 104
Iron Workers Local 7
League of Conservation Voters
League of Women Voters MA
Maine Audubon
Maine Climate Action Now
Maine Conservation Voters
Mass Audubon
National Wildlife Federation
Natural Resources Council of Maine
New England Aquarium
North Atlantic States Regional Council of Carpenters
PowerOptions
ReVision Energy
Salem Alliance for the Environment
Save the Sound
Seaside Sustainability
Second Nature
Sierra Club
Tufts University
UMass Amherst
UMass Boston
UMass Lowell / Windstar
Union of Concerned Scientists
VT Natural Resources Council
VHB

Director Elizabeth Klein
Bureau of Ocean Energy Management
1849 C Street, NW
Washington, D.C. 20240

RE: New England for Offshore Wind Coalition Introduction & Priorities

Submitted electronically to: elizabeth.klein@boem.gov

Dear Director Klein,

On behalf of the 100+ organizations in our coalition and the thousands of New Englanders we represent, we want to congratulate you on your appointment as Director of the Bureau of Ocean Energy Management. Thank you for your support for the rapid and responsible deployment of offshore wind energy in the U.S. We want to share with you our top priorities for offshore wind in the New England Region.

New England for Offshore Wind is a broad-based coalition of associations, businesses, environmental and justice organizations, academic and research institutions, and labor unions that recognize offshore wind is uniquely positioned to address the unprecedented and intersecting environmental, public health, and economic crises of our time that exacerbate racial and social injustices and present an existential threat to our communities, our nation, and our world. We applaud the administration's sweeping, whole-of-government approach that signals the urgency, seriousness, and determination that is needed to address these challenges head on. BOEM has driven this process with an incredible amount of resourcefulness, and we feel confident that this will continue to drive this agenda forward.

The significant contribution that offshore wind power can and must play in reducing pollution and combating climate change cannot be overstated, and we are pleased to have an essential and willing partner in the federal government to ensure offshore wind rises to its game-changing potential. To realize these benefits, we ask for your attention on the following recommendations regarding the responsible development of offshore wind energy as it relates to environmental mitigation, transmission, economic development, infrastructure resiliency and environmental justice:

Environmental Protection:

- Ensure that we first avoid, then minimize and mitigate potential impacts to wildlife and marine ecosystems throughout all stages of development.
- Provide protection for wildlife and marine ecosystems and clarity to the industry by requiring a strong set of best management practices that include pre-, during, and post-construction monitoring and a plan for adaptive management to ensure all development activities are guided by the latest science.
- Encourage quieter foundation types, which offer reduced impacts on marine wildlife while providing greater flexibility for development in terms of year-round construction and reduced need for mitigation measures.
- Require the best available control technology for noise, if pile driving is planned to occur, and deployment of lighting guidelines.

Endorsers:

Amalgamated Bank
Audubon Society of Rhode Island
Bemis Associates
Ben Hillman & Company
Berkshire Bank
Boston Energy Wind Power Services Inc.
Cape Cod Climate Change Collaborative
Cape Cod Five
Climate Action Now, Western MA
Climate Reality Project – MA Southcoast
CT Sustainable Business Council
E. Hampton Clean Energy Task Force
Eastern Bank
Eastern CT Green Action
Energy Efficiency Associates, LLC
Environmental Council of RI
Faith Communities Enviro. Network
Flashover LLC
Green Newton
Greenwater Marine Sciences Offshore
Hollis Line Machine
IUPAT DCI I
MA AFL-CIO
MassMEP
Mass Climate Action Network
MOCA Westport
Mothers Out Front
Muggventures
New Hampshire Audubon
NH Businesses for Social Responsibility
NH Citizens for Progress
NH Environment, Energy & Climate Network
People's Action for Clean Energy
POWER-US | MA
Rhode Island Building Trades
Seacoast Anti-Pollution League
Self-Reliance
Skunk Works Fund
University of Maine
Vineyard Power Cooperative Inc.

- Employ effective measures, such as vessel-speed restrictions, to avoid serious injury and mortality to critically endangered North Atlantic right whales and other wildlife from vessel strikes.
- Make all project-level data publicly available. Although the offshore wind industry is 30 years old, there is relatively little high-quality data in the public domain that can serve as the basis for scientific advancement and engineering innovation. BOEM is in a position to revolutionize the science of offshore wind on a global level by using its authority to require effective data-sharing.

Transmission

- Clarify and modify transmission permitting to add specificity to the permitting process for third-party offshore cable routes between lease areas.
- Explore and evaluate, in coordination with DOE, more effective alternatives to the existing auction, lease, and permitting processes to align them better with state offshore wind generation procurements.

Economic Development:

- Utilize existing BOEM authority to award leases that will secure quality high quality jobs in the domestic supply chain, building, construction, operation and maintenance in all future leasing.
- Provide an efficient, consistent approval process that offers clarity and predictability on the project development pipeline that will present the necessary demand to drive job creation and domestic supply chain build out.

Adding Capacity:

- Lead robust stakeholder engagement processes and tribal consultation for Gulf of Maine leasing and ensure the lease auction occurs on schedule without delay, before the end of 2024.
- Advance 5-year lease planning for offshore wind that is aligned with state policy goals for offshore wind, decarbonization, and clean energy.

Tribal Consultation:

- Prioritize the interests of Tribal Nations and Indigenous voices within the permitting and development for offshore wind projects. Ensure the procedure is transparent and timely to uplift Indigenous peoples' priorities.

Stakeholder Engagement:

- Establish a public comment window and hearing schedule well in advance of comment opportunities to ensure stakeholders have time to prepare and meaningfully engage.
- Conduct hearings in an inclusive manner that includes options at various times of day; language accessibility for non-English speakers, deaf, and hard of hearing; and phone access for those without internet.

Together, we stand ready to work with BOEM and the Biden Administration to help fulfill our offshore wind commitments with a comprehensive, responsible approach to scaling up this critical new energy source for America.

Sincerely,

Susannah Hatch, Regional Lead
New England for Offshore Wind

