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Re: Draft Wind Energy Areas, request for comments.

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The American Clean Power Association (ACP)[1] and RENEW Northeast Inc. (RENEW)[2] appreciate the opportunity to submit comments on the Bureau of Ocean Energy Managements (BOEM) Draft Wind Energy Area (WEA) on the Outer Continental Shelf offshore the States of Maine, New Hampshire and Massachusetts. ACP and RENEW appreciate BOEM's work to ensure that the Area ID process is transparent and inclusive, and its work to establish sufficiently large WEA to support commercial leasing in the Gulf of Maine. Robust leasing in the Gulf of Maine will allow Massachusetts and Maine to meet their current, and anticipated future offshore wind and decarbonization goals, but will also help grow and sustain a durable onshore supply

[1] ACP is the national trade association representing the renewable energy industry in the United States, including in all aspects of offshore wind energy, bringing together over 1,000 member companies, 120,000 members, and a national workforce located across all 50 states with a common interest in encouraging the deployment and expansion of renewable energy resources in the United States. By uniting the power of wind, solar, storage, and transmission companies and their allied industries, ACP seeks to enable the transformation of the U.S. power grid to a low-cost, reliable, and renewable power system. The views and opinions expressed in this filing do not necessarily reflect the official position of each of ACP's individual members.

[2] RENEW Northeast, Inc. ("RENEW") is a non-profit association uniting environmental advocates and the renewable energy industry whose mission involves coordinating the ideas and resources of its members with the goal of increasing environmentally sustainable energy generation in the Northeast from the region's abundant, indigenous renewable resources. RENEW members own and/or are developing large-scale renewable energy projects, energy storage resources and high-voltage transmission facilities across the Northeast. They are supported by members providing engineering, procurement, and construction services in the development of these projects and members that supply them with multi-megawatt class wind turbines. RENEW seeks to promote policies that will increase energy diversity, promote economic development, and achieve state policy goals including those found in Renewable Portfolio Standards and Global Warming Solutions Acts.

chain with tens of thousands of well-paying clean energy jobs, and support our national goal of deploying 30 gigawatts (GW) of offshore wind energy by 2030.[3]

I. Introduction.

As stated in our comments on the Call for Information and Nominations for Commercial Leasing for Wind Power Development on the Gulf of Maine Outer Continental Shelf (Call),[4] offshore wind power is essential to combatting the climate crisis, revitalizing the U.S. maritime and manufacturing sectors, and to providing economic benefits to local communities. [5] The Gulf of Maine has some of the strongest winds in the country.[6] This abundant wind resource, coupled with the region's close proximity to large population centers, makes the Gulf of Maine ideally situated to become an offshore wind energy hub. With only a few floating offshore wind projects currently deployed globally, robust leasing in the Gulf of Maine will help position the U.S. to be a global leader in floating offshore wind and reap the benefits of thousands of jobs in the new energy economy.

The Gulf of Maine is therefore well situated to play a key role in achieving the Administration's climate goals and in helping to mitigate against the worst impacts of climate change. In Executive Order 1400, " *Tackling the Climate Crisis at Home and Abroad*" President Biden called deployment of clean energy technologies, such as offshore wind, "critical for climate protection" and established that "[i]t is the policy of my Administration to organize and deploy the full capacity of its agencies to combat the climate crisis to implement a Government-wide approach that reduces climate pollution in every sector of the economy… especially through innovation, commercialization, and deployment of clean energy technologies and infrastructure."

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[3] *See* https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/29/fact-sheet-biden-administration-jumpstarts-offshore-windenergy-projects-to-create-jobs/.
[4] American Clean Power and RENEW Northeast Inc., *Call for Information and Nominations for Commercial Leasing for Wind Power Development on the Gulf of Maine Outer Continental Shelf,* (June 12, 2023). Available at: https://www.regulations.gov/comment/BOEM-2023-0025-0093.
[5] American Clean Power Association, *Request for Interest, Commercial Leasing for Wind Energy Development on the Gulf of Maine Outer Continental Shelf,* (October 3, 2022). Available at: https://www.regulations.gov/comment/BOEM-2022-0040-0042
[6] Musial, Walter 2018. Offshore Wind Resource, Cost, and Economic Potential in the State of Maine. Golden, CO: National Renewable Energy Laboratory. NREL/TP-5000-70907. https://www.nrel.gov/docs/fy18osti/70907.pdf

The EO further called on the Administration to "accelerate the deployment of clean energy and transmission projects in an environmentally stable manner."[7] In addition, on March 29, 2021, President Biden set a goal of deploying 30 GW of offshore wind by 2030 and 110 GW of offshore wind by 2050.[8] Meeting the goal of 30 GW will trigger more than $12 billion per year in capital investment in projects on both U.S. coasts, create tens of thousands of good-paying, union jobs, with more than 44,000 workers employed in offshore wind by 2030 and nearly 33,000 additional jobs in communities supported by offshore wind activity. It would also unlock a pathway to deploy 110 GW or more of offshore wind by 2050, supporting 135,000 total jobs, including 77,000 jobs in offshore wind and 58,000 induced jobs in communities with offshore wind activity. It will also generate enough power to meet the demand of more than 10 million American homes for a year and avoid 78 million metric tons of CO2 emissions.[9]

II. BOEM should maximize the size of the final WEAs.

ACP and RENEW appreciate BOEM's work to cast a wide net and identify a Draft WEA consisting of 3,519,067 acres, with a combined capacity of over 40 GW. In the notice, BOEM notes that it "anticipates further reduction to the Draft WEA… informed by comments received in response to this notice as well as through BOEM's public engagement efforts."[10] As BOEM moves through this process, ACP and RENEW encourage the agency to minimize any further reductions to the WEA. A sufficiently large WEA is necessary to meet existing and anticipated federal and state offshore wind and greenhouse gas (GHG) emission targets and spur growth in the domestic supply chain. It is also necessary to create optionality in the Proposed Sale Notice (PSN) and to ensure sufficient flexibility for future lease sales.

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[7] The White House, *Tackling the Climate Crisis at Home and Abroad,* (January 27, 2021). Available: https://www.energy.gov/sites/default/files/2021/02/f83/eo-14008-tackling-climate-crisis-home-abroad.pdf

[8] The White House, Fact Sheet: Biden Administration Jumpstarts Offshore Wind Energy Projects to Create Jobs, (March 29, 2021). Available at: https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/29/fact-sheet-biden-administration-jumpstarts-offshore-wind-energy-projects-to-create-jobs/

[9] *See* Department of Energy, *National Offshore Wind Goal To Support 77,000 Jobs, Power 10 Million Homes, Cut 78 Million Metric Tons in Carbon Emissions,* (March 29, 2021). Available at: https://www.energy.gov/articles/energy-secretary-granholm-announces-ambitious-new-30gw-offshore-wind-deployment-target

[10] Notice at 15

a. <u>BOEM should set a public goal of leasing enough acres and leases to generate at least 20 GW of offshore wind.</u>

As we noted in our Call comments, ACP and RENEW recommend that BOEM identify a final WEA large enough to allow the agency to set a goal of issuing enough leases, with a minimum of 100,000 acres per lease, to generate at least 20 GW of offshore wind. A 20 GW goal would not only help meet state and federal decarbonization goals,[11] but it will also help spur economic growth within the Gulf of Maine. Furthermore, the Gulf of Maine is uniquely positioned to provide electricity to New England states which need 32 GW of offshore wind by 2050 to meet their decarbonization goals.[12] A large portion of this would need to come from the Gulf of Maine. As stated in our comments on the RFI, an NREL analysis of offshore wind development found that a single 600 MW offshore wind facility "could support approximately 4,470 jobs and $445 million in GDP during construction and an ongoing 150 jobs and $14 million annually from operation and maintenance labor, materials, and services."[13] Clearly, offshore wind has the potential to add substantially to local economies, generating new opportunities for the current workforce and future generations. By committing to a 20 GW offshore goal, BOEM could create tens of thousands of jobs and generate billions of dollars annually.

This commitment could also help to encourage investment in the development of a local supply chain by creating economies of scale that drive down costs. To achieve economies of scale in the offshore wind industry, the development of larger offshore projects is key. These larger projects bring about cost reductions and attract significant investments in the supply chain. The scale of the projects needs to be substantial enough to minimize development costs and justify the

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[11] Massachusetts has committed to achieving Net Zero GHG emissions by 2050 and has established a decarbonization roadmap to achieve this goal. This roadmap makes clear that 15-25 GW of offshore wind will be required to realize net-zero by 2050. Lawmakers also recently passed a bill that requires the development of an additional 2,400 megawatts ("MW") of offshore wind, bringing Massachusetts' total target to 5,600 MW, and increases the state's Renewable Portfolio Standard ("RPS") to 40% by 2030. In 2019, Maine's Governor Mills signed an Executive Order committing Main to carbon neutrality by 2045[11] and set a goal of 30,000 clean energy jobs in Maine by 2030.[11] In 2009 Maine set a goal of installing 5 GW of offshore wind energy, and is currently re-visiting that goal. Most recently, the White House supplemented its 2021 goal of 30 GW of offshore wind deployed by 2030 by announcing an additional national target of 15 GW of floating offshore wind deployed by 2035.

[12] ISO New England Inc. 2023. Draft 2050 Transmission Study. https://www.iso-ne.com/static-assets/documents/100005/2023_11_01_pac_2050_transmission_study_draft.docx.

[13] Musial, Walter 2018. Offshore Wind Resource, Cost, and Economic Potential in the State of Maine. Golden, CO: National Renewable Energy Laboratory. NREL/TP-5000-70907. https://www.nrel.gov/docs/fy18osti/70907.pdf.

establishment of a new offshore wind industry and its associated supply chain. By leveraging the economies of scale derived from expansive lease areas capable of supporting larger projects, the industry can drive down costs, optimize project layouts, and foster the growth of a regional supply chain. A commitment to 20 GW will help to create these economies of scale by ensuring that larger projects can be developed in the Gulf of Maine.

Finally, a commitment to 20 GW of offshore energy, will provide clarity to federal agencies including the Department of Defense (DoD) and the United States Coast Guard (USCG) as well as to other impacted stakeholders. Such upfront transparency as to BOEM's offshore wind objectives should encourage early stakeholder engagement, thereby preventing future delays that arise when these objectives are not made sufficiently clear.

b. <u>ACP and RENEW support phased leasing.</u>

In the notice BOEM states that it is "interested in advancing a phased commercial leasing program for the Gulf of Maine, through which multiple lease sales may occur. ACP and RENEW fully support the establishment of a phased leasing program that outlines a schedule for Gulf of Maine lease sales (with sales scheduled for every two years) as well as target acreages and GWs for each sale. This will establish predictability in the industry which can help inform state procurements and encourage the build out of the supply chain. ACP and RENEW recommend that BOEM hold a robust first round lease sale in 2024 with enough acreage and leases to generate at least 13 GW of offshore wind energy. This would help meet Federal and state offshore wind goals and establish certainty for developers. In addition, BOEM should prioritize areas that are most feasible for development in the first leasing phase with a focus on distance from shore. As discussed in the transmission section below, areas in the eastern portion of the WEA should be considered for future phases of leasing to allow for further technological advancements.

A phased leasing program would further provide BOEM with maximum flexibility when identifying a final WEA. As stated above, ACP and RENEW strongly recommend that BOEM minimize reductions to the draft WEA. A large final WEA would provide BOEM with the

opportunity to pull individual lease areas from the WEA and move forward with multiple phases of robust lease sales. There is little benefit from removing large areas from the draft WEA as any outstanding use conflict can be further studied prior to future lease sale phases, and if necessary, conflicted areas removed before those specific lease areas are identified and put forward for sale. As BOEM moves forward with this process, we encourage the agency to make clear that the auction will not be delayed by the parallel development of the research lease area. Delays to investments of commercial scale lease projects that will result if the auction does not occur in a timely manner will ultimately prevent the administration and states from meeting their renewable energy targets.

c. NCCOS model should put more weight on commercial suitability than it has in past leasing processes.

ACP and RENEW's comments on the Call emphasized the need to put more weight on the commercial suitability of areas under consideration. We reiterate those comments and continue to urge BOEM to augment greater weight to commercial viability with the following. First, BOEM should give itself credit in the NOAA National Centers for Coastal Ocean Sciences (NCCOS) model for deconfliction at earlier stages in the leasing process. Failure to do so means certain portions of the draft WEA appear more conflicted than they actually are: these areas are only compared to other portions of the WEA and not to the ocean as a whole. This, in turn, could skew the results of the NCCOS model and result in premature removal of areas from consideration for leasing. Second, BOEM should ensure that it does not prematurely remove areas from WEAs due to perceived conflicts that may be resolved as a result of construction and operations plan (COP) stage mitigation measures. By making these further refinements, BOEM can make good on the promise of the NCCOS model as a tool to transparently move from the draft WEA to final WEA stage of the leasing process in a way that balances the interests of all stakeholders.

III. Secondary areas should be considered in the final WEA.

BOEM notes that it has identified three "Secondary Areas for Further Analysis" that are "not part of the draft WEA" but could be considered part of the final WEA.[14] ACP and RENEW strongly recommend that BOEM include Secondary Area C in the final Wind Energy Area and prioritize its inclusion in the first phase of leasing. The inclusion of Secondary Area C would represent a meaningful increase in the amount of area feasible for HVAC transmission while avoiding other constraints identified by BOEM and the NCCOS model. Specifically, Secondary Area C avoids LMA1, is material in size (53,374 acres), close to key infrastructure and, critically, viable for HVAC.

Even though the majority of the call area is suitable for fixed bottom substations, portions would need floating substation technology and floating HVDC substations will likely not be an available, cost-competitive technology until the late 2030s. Furthermore, while the draft WEA is over 3 million acres in total area, the amount of area that is HVAC compatible is substantially lower. Therefore, because of its viability for HVAC, Secondary Area C is an area of significant potential for offshore wind. Overall, ACP and RENEW encouragee BOEM to coordinate with the USCG on the recommended MNMPARS Gulf of Maine Fairways to ensure highly suitable offshore HVAC areas are included in the final WEAs, which would support Gulf of Maine states in meeting their OSW goals and lead to overall savings for rate payers in the Gulf of Maine. More generally, ACP and RENEW encourages BOEM to preserve as much HVAC-compatible area as possible in the final WEA designation and include those in the first phase of leasing.

While more information and analysis are needed for Secondary Area A to confirm that it does not unduly conflict with the needs of lobster fishermen, the results from the NCCOS model shows that it is highly suitable for offshore wind development. In addition, it represents significant commercial opportunities for wind development (which as discussed will be beneficial to local economies) and would benefit the levelized cost of electricity (LCOE). Secondary Area A is closer to population centers, viable for HVAC, and of sufficient size for commercial development. As such, ACP and RENEW strongly encourage BOEM to include Secondary Area A for potential future leasing. Further, ACP and RENEW recommend that if Secondary Area A is

[14] Notice at 17

included in a final WEA, that it be part of a future lease sale in a phased leasing program. This will allow time for further evaluation to identify the extent the area is utilized by various fisheries, including lobster fisheries, and what mitigation measures, if any, should be implemented to reduce use conflicts with offshore wind and the lobster industry. The offshore wind industry is committed to continue to work with the fishing community to ensure that lobster fishing and offshore wind development can occur in ways that are mutually beneficial to both industries.

IV. BOEM should include bidding credits as part of a multi-factor auction.

ACP and RENEW strongly encourage BOEM to use bidding credits as a part of a multi-factor auction. In the notice, BOEM notes that "recent sales have focused bidding credits on developing the domestic offshore wind supply chain, workforce training, and providing compensatory mitigation for offshore wind's potential impacts to the fishing industry." ACP and RENEW support the use of bidding credits that are relevant to coastal state needs, and also recommend including a tribal and environmental justice bidding credit, as described in our Call comments. As discussed below, bidding credits to address impacts to the fishing industry should be in the form of a regional fisheries compensation fund.

a. BOEM should establish a substantial bidding credit.

In the notice, BOEM states it "limits the total value of bidding credits to 25% of the winning bid." However, in past lease sales in the Gulf of Mexico, BOEM utilized a 30% bidding credit. ACP and RENEW encourage BOEM to mirror this approach in the Gulf of Maine. This would best support the development of offshore wind by utilizing the funds generated from bidding credits to reduce impacts and develop the domestic supply chain.

b. Regional fisheries compensation fund

Eleven East Coast States; Maine, New Hampshire, Massachusetts, Rhode Island, Connecticut, New York, New Jersey, Delaware, Maryland, Virginia, and North Carolina along with

commercial fishermen and the offshore wind industry are in negotiations to establish a regional compensation fund administrator for fisheries compensatory mitigation. This fund would provide financial compensation from economic loss to fisheries from offshore wind development, in recognition of the need to sustain a fishing community that can co-exist and thrive alongside offshore wind energy development.[15] To ensure a robust investment in this fund BOEM should establish an East Coast bidding credit for contributing to the fund. The bidding credits should be in exchange for the winning bidder's phased contributions to an established third-party compensation fund.

V. Transmission Considerations

As stated in our comments on the RFI and reiterated in our Call comments, ACP and RENEW strongly urge BOEM to consider transmission issues early in the leasing process, given the limited number of potential interconnection points along the Gulf of Maine coastline, variable seabed conditions, numerous marine uses and users in the coastal and offshore marine spaces, and distance from shore considerations. Regardless of whether radial or mesh/backbone transmission is considered, numerous Gulf of Maine environmental constraints must be taken into account for meaningful early planning of potential transmission routing.

Offshore submarine cable route planning aims to minimize impacts to marine users and uses and, given the many environmental sensitivities that exist within the Gulf of Maine, the need for including this aspect of offshore wind generation into the BOEM evaluation of potential lease areas is of paramount importance. Coupling the offshore complexities with onshore routing and siting complexities amplifies the need for transmission in the greater Gulf of Maine region to be a priority consideration when designing final lease area locations. Moreover, it is imperative for BOEM to plan for transmission infrastructure that can deliver large amounts of offshore wind power not only to densely populated centers along the coast but also to the greater New England region.

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[15] Request for Information (RFI): Framework for Establishing a Regional Fisheries Compensation Fund Administrator for Potential Impacts to the Fishing Community from Offshore Wind Energy Development, available at https://offshorewindpower.org/wp-content/uploads/2022/12/FisheriesCompensationFund_RFI_FINAL.pdf

To facilitate this, ACP and RENEW strongly encourage BOEM to coordinate with ISO-NE on both transmission planning as well as lease area identification. ISO-NE can help inform the planning process by identifying which lease areas are the most feasible from a terrestrial transmission standpoint. BOEM should consider coupling this ISO-NE input with industry expertise in submarine cable routing to examine transmission viability from a holistic, end-to-end perspective. In addition, ISO-NE would be an integral part of discussions with respect to radial or mesh/backbone transmission planning.

ACP and RENEW cannot impress enough the criticality of folding in end-to-end transmission complexities and considerations in the lease identification process in the Gulf of Maine. If BOEM would like to further discuss with ACP and RENEW ideas on how to effectively incorporate such inputs into a lease identification methodology, ACP and RENEW would be open to further discussions.

a. <u>Distance from shore.</u>

Transmission from offshore lease areas that are significantly distant from onshore points of interconnection introduces numerous challenges. This includes increased costs to both developers and ratepayers, environmental and technical siting challenges, as well as the potential need for compensation platforms. If HVDC floating platforms are not commercially available by the time projects are ready to begin construction, compensation platforms along the cable route for HVAC would be necessary due to the distance from shore. For area in the eastern portion of the lease, compensation platforms may not be feasible, therefor, these areas should be considered for inclusion in future phases of leasing to allow time for technological development. ACP and RENEW recommend that BOEM initiate a transmission task force to tackle these issues and specifically, investigate the best locations for building HVAC compensation platforms along potential transmission corridors. This early planning can help to reduce environmental and use conflicts while ensuring project viability. In addition, BOEM should consider increasing the size of leases issued in the eastern portion of the WEA due to the need for more power production to ensure commercial viability given the greater distance to shore.

b. Stellwagen Bank National Marine Sanctuary .

As noted in ACP and RENEW's Call comments, Stellwagen Bank National Marine Sanctuary ("NMS") presents a unique challenge to transmission for Gulf of Maine offshore wind projects. Some of the most cost-effective, direct offshore submarine export cable corridor paths to available points of interconnection in the Boston Harbor and Massachusetts Bay areas would pass through the sanctuary. While we appreciate NOAA's openness to siting offshore wind transmission through Stellwagen Bank NMS at the May 10-11 BOEM taskforce meeting and agree that it can be done with minimal environmental impacts, ACP and RENEW are concerned that an efficient and transparent permitting pathway for routing through an NMS does not exist.

It is understood that BOEM's approval of projects' COPs grants the required easements necessary for a project's submarine transmission cables. However, as noted by NOAA, if the submarine transmission cable needs to traverse an NMS, BOEM is prohibited from issuing such easement for that portion of the cable's route and the project would need to seek a special use permit and authorization from NOAA's Office of National Marine Sanctuaries ("ONMS"). The special use permit that ONMS could issue to allow the continued presence of submarine export cables is statutorily limited to a five-year term. As a result, any future Gulf of Maine Leaseholders would need to seek a reissuance of the special use permit every five years. Thus, every five years, ONMS could deny permit reissuance or prescribe more onerous or costly conditions or obligations associated with each renewal. Having certainty that a project can operate for the expected useful life of the project is a key consideration for project financing. As the submarine export cables are the only way to deliver the energy to the grid, projects' lenders will likely be unwilling to provide billions of dollars in funding without certainty that the project can operate beyond five years' time.

Besides the financing risk of needing to site a submarine transmission cable through a NMS, there are also risks associated with the increased regulatory burden of needing to obtain two more permits from an agency that would otherwise not have any regulatory authority over the project. ONMS sits in a different federal Department from BOEM, has different goals and objectives from BOEM, and may not align with BOEM on certain issues, requiring leaseholders to coordinate approval of its submarine cables between BOEM, NOAA, and the Army Corps of Engineers.

The timeline and financial impacts of a separate, additional, regulatory process to site submarine cables could be significant. Therefore, ACP and RENEW encourage BOEM to thoroughly coordinate and strategically plan with all concerned parties how a transparent and predictable permitting pathway can be designed to facilitate submarine cable routing through the Stellwagen Bank NMS. Such investment in designing a clear permitting pathway will encourage offshore wind investment and provide certainty to prospective developers in the Gulf of Maine.

VI. BOEM should replicate the model used for the Commercial and Research Wind Lease and Grant Issuance and Site Assessment Activities on the Outer Continental Shelf of the Gulf of Mexico Final Environmental Assessment.

For offshore wind leasing in the Gulf of Mexico, BOEM took a more inclusive approach and conducted the environmental assessment on the entire Gulf of Mexico Call Area. This allowed for maximum flexibility when identifying lease areas. Conducting the EA for a more inclusive area would complement a phased leasing program in that new environmental analysis under NEPA would not need to be conducted for each subsequent lease sale. BOEM and RENEW strongly encourage BOEM to use a more inclusive area for analysis in the environmental assessment for lease issuance and closely align with the model used for the Gulf of Mexico.

VII. Marine Mammal Considerations.

ACP and RENEW recognize that the Gulf of Maine serves as habitat for marine mammals including the critically endangered North Atlantic Right Whale (NARW). The offshore wind

industry is committed to the responsible development of offshore wind to ensure that all development and operations activities are conducted in an environmentally responsible manner. It is also important to note that the primary threat to the marine ecosystem (including marine mammals) is human induced climate change, and that offshore wind offers one of the best solutions to climate change. A robust build out of offshore wind will help avoid the worst impacts of a warming world and ocean. Furthermore, any development in the Gulf of Maine would utilize floating technology that does not produce substantial sound during installation, thus eliminating the main impact producing factor for marine mammals from offshore wind development.

In addition, a study conducted by the National Academies of Science, Engineering, and Medicine on potential impacts from offshore wind on hydrodynamics found that potential ecological impacts of offshore wind farms would be difficult to detect, particularly considering the scale of natural variability as well as other anthropogenic variability of the Nantucket Shoals region's evolving oceanography and ecology.[16] In addition, the study found that when it comes to impacts to NARW prey fields, there are three possibilities:

> *(1) turbines could cause an increase in zooplankton productivity and/or aggregation of zooplankton into high-density patches to support right whale foraging and increase right whale use of this habitat; (2) turbines may decrease zooplankton productivity and/or reduce the potential for high-density aggregations, thus potentially reducing foraging opportunities for right whales in the region; or (3) wind farm development may have no appreciable impact on right whale foraging dynamics.*

Given the lack of evidence that demonstrates any connections between offshore wind turbines and changes in hydrodynamics and NARW prey fields, areas should not be removed from the WEA due to these concerns. ACP and RENEW encourage BOEM to only rely on the best available information and utilize an adaptive management approach where mitigation measures

[16] National Academies of Sciences, Engineering, and Medicine. 2023. *Potential Hydrodynamic Impacts of Offshore Wind Energy on Nantucket Shoals Regional Ecology: An Evaluation from Wind to Whales.* Washington, DC: The National Academies Press. https://doi.org/10.17226/27154.

are implemented only if new science definitively demonstrates negative impacts from offshore wind on hydrodynamics and NARW prey fields. Without that definitive data, it would be inappropriate and arbitrary to remove any areas due to these concerns or impose any development restrictions on lease areas.

VIII. Conclusion.

ACP and RENEW appreciate the opportunity to submit comments on the Gulf of Maine draft WEAs. We look forward to working with BOEM as it moves forward with this process.

Sincerely,

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