Zachary Jylkka
Bureau of Ocean Energy Management
Office of Renewable Energy Programs
45600 Woodland Road
Mailstop: VAM-OREP, Sterling, VA 20166

October 3, 2022

Re: Request for Interest, Commercial Leasing for Wind Energy Development on the Gulf of Maine Outer Continental Shelf

Submitted via regulations.gov Document ID: BOEM-2022-0040-0001

The American Clean Power Association ("ACP") welcomes the opportunity to provide comments on the U.S. Bureau of Ocean Energy Management's ("BOEM") Request for Interest: Commercial Leasing for Wind Energy Development on the Gulf of Maine Outer Continental Shelf ("RFI"). We support BOEM's action to move forward with the commercial leasing process in the Gulf of Maine in furtherance of this administration's strategy to deploy floating offshore renewable energy to meet the nation's clean energy and climate goals.

I. Introduction

Offshore wind power is essential to combatting the climate crisis, revitalizing the U.S. maritime and manufacturing sectors, and providing economic benefits to local communities. The Gulf of Maine has some of the strongest winds in the country.[1] 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. At the same time, the Gulf of Maine is warming faster than 96% of the world's oceans, jeopardizing its unique ecosystems.[2]

In order to capture these benefits as soon as possible and avert the worst effects of climate change, ACP recommends that BOEM set a goal of leasing enough acres in its current Gulf of Maine leasing process to generate ***at least 10 gigawatts*** ("GW") of offshore wind. This level of leasing is needed to meet existing federal and state offshore wind and greenhouse gas reduction targets:

- Massachusetts legislatively required decarbonization roadmap makes it clear that 15-25 GW of offshore wind will be required to hit net zero by 2050.[3] Massachusetts lawmakers recently passed supportive climate legislation that sets a statewide net zero limit on greenhouse gas emissions by 2050.[4] The bill also requires the development of an additional 2,400 megawatts ("MW") of

[1] *Offshore Wind Resource, Cost, and Economic Potential in the State of Maine* at 2, by Walter Musial of National Renewable Energy Laboratory.
[2] Kasha, Patel. 2022. Gulf of Maine waters spiked to record warm levels in fall 2021. The Washington Post: https://www.washingtonpost.com/weather/2022/01/12/gulf-maine-record-warm-2021/
[3] Available at https://www.mass.gov/doc/ma-decarbonization-roadmap-lower-resolution/download.
[4] Available at https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities

offshore wind, bringing Massachusetts' total target to 5,600 MW, and increases the state's Renewable Portfolio Standard ("RPS") to 40% by 2030.[5]

- Maine has made a commitment to become carbon-neutral by 2045, and has announced a goal of 30,000 clean energy jobs in Maine by 2030.[6] Maine set a 5GW by 2030 goal in 2009, and is currently revisiting that goal.[7]
- 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.[8]

These urgent objectives cannot be achieved without robust offshore wind leasing in the Gulf of Maine.

The Gulf has the technical potential to produce more than 156 GW of offshore wind energy.[9]BOEM can thus go beyond the 10 GW threshold in its current process while only leasing a small percentage of the Gulf of Maine. Ultimately, BOEM should select commercially viable lease areas in the Gulf of Maine that avoid the most environmentally sensitive and most heavily fished areas and can generate more than 10 GW of clean energy. In order to accomplish this objective, ACP recommends that BOEM cast a wide net at this early stage and identify call areas that are sufficiently large to gather maximum information to best inform its eventual designation of wind energy areas ("WEAs") and leases.

Conversely, delaying or limiting offshore wind in the Gulf of Maine will slow our nation's efforts to transition the US to renewable energy sources. We must address the climate crisis, so that future generations can enjoy a healthy and productive ocean. It is possible to avoid worsening storms, extreme ocean warming and acidification, loss of key fisheries, and amplified impacts to marine wildlife, but that process begins with continued input from local communities and the building of trust among all stakeholders. ACP members are dedicated to being responsible ocean users and contributing members to the ocean community in and around the Gulf of Maine.

As discussed below, ACP believes it is possible to pursue offshore wind leasing in the Gulf of Maine while still preserving healthy fisheries and other natural resources in the Gulf of Maine which are all threatened by climate change. We pledge to work alongside other ocean users, coastal communities, environmental groups, and federal, state, and regional partners to implement offshore wind in a collaborative manner to achieve these goals. To this end, we present the following comments.

II. Comments

A. Offshore Wind is Ideally Suited to Deployment in the Gulf of Maine and Would Be an Economic Asset for the Entire Region.

The Gulf of Maine has the best wind potential on the entire East Coast. Regional states already comprise an offshore wind hub with the ability to amplify the momentum by adding tens of GW of

---

[5] Id at 2.
[6] Available at https://www.maine.gov/governor/mills/issues/energy-environment-climate-change
[7] Available at https://www.maine.gov/energy/initiatives/offshorewind#:~:text=Offshore%20wind%20is%20one%20of,of%20offshore%20wind%20by%202030.
[8] Available at https://www.whitehouse.gov/briefing-room/statements-releases/2022/09/15/fact-sheet-biden-harris-administration-announces-new-actions-to-expand-u-s-offshore-wind-energy/
[9] The University of Maine, available at https://composites.umaine.edu/wp-content/uploads/sites/20/2016/12/UMaineCompositesCenter_OffshoreWind_12122016.pdf ; Also Available at https://www.newenglandforoffshorewind.org/states/maine/

additional capacity in the Gulf of Maine. BOEM data, and NREL studies. The Gulf of Maine RFI area is 36,000 square miles, yet the region would reap vast economic benefit with only a small amount of that area used for offshore wind deployment, . This untapped resource will create millions in revenue for state and local governments and help create thousands of jobs, in addition to increased jobs and revenue in supporting industries.

A 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."[10] Maine's onshore wind energy workforce has seen strong growth in recent years; between 2016 and 2020 the number of workers grew by 7.1%. The sector also demonstrated resiliency through the pandemic, growing 4% between 2019 and 2020. Offshore wind has the potential to add substantially to Maine's economy, generating new opportunities for the current workforce and future generations. If BOEM were to issue a large lease sale accommodating even a small fraction of the technical capacity of the Gulf of Maine, BOEM would provide the opportunity to create tens of thousands of jobs and generate billions of dollars annually. ACP encourages BOEM to issue lease sales that would generate this type of volume, as it is necessary to sustain supply chains and encourage further offshore development.

Due to factors in the Gulf of Maine region, like constant high wind speeds, cost of generation can scale incredibly well, making it viable for developers to make the substantial upfront investments required to develop a local supply chain and quickly adapt technical solutions to local conditions.

Based on economic modeling from NREL in late 2018, the Maine coast would provide the lowest Levelized Cost of Energy ("LCOE") within the Gulf of Maine, due to a combination of higher wind speeds and moderately shallow water.[11] It is critical that lease areas provide the optionality to connect into multiple states, which is most possible with a sufficient number of geographically varied lease areas, which in turn will support developer portfolio diversity to encourage competition and regional economic investments. This would also have the benefit to potential investors of maximizing a future project's ability to secure an offtake contract if local state demands facilitate it.

B. Offshore Wind and Fisheries Can Thrive Together in the Gulf of Maine

The offshore wind industry is committed to working with and supporting robust and profitable fisheries in the Gulf of Maine. Commercial fishing and offshore wind can do more than simply coexist. ACP recognizes that fisheries, and the communities who rely on them, are at the heart of the Gulf of Maine region, historically, economically, and socially. We believe economic gains from offshore wind and its close partnership with coastal communities will yield dividends, while the benefits of addressing the climate crisis and limiting warming in ocean waters will help preserve fisheries and the region's way of life.

Communication, cooperation, and commitment are how we move forward together. ACP encourages BOEM to consider call areas that avoid the most productive fishing grounds, while still being large enough to provide flexibility to lease areas that provide for more than 10 GW of commercially viable offshore wind generating capacity. At the same time, we appreciate the work being done by Maine's Fisheries Working Group ("FWG") in coordination with the Maine Offshore Wind Roadmap

[10] NREL Study available at https://www.nrel.gov/docs/fy18osti/70907.pdf
[11] Offshore Wind Resource, Cost, and Economic Potential in the State of Maine at 8-11.

Advisory Committee.[12] We recognize that a significant proportion of fishing effort in the Gulf of Maine coincides with Lobster Management Area 1, and our members look forward to a productive dialogue with the FWG and BOEM regarding how its recommendations can best be incorporated into future stages of the leasing process.

Building on the FWG's work, BOEM should consult with the fishing industry to incorporate their input on fisheries and habitat in order to minimize conflict. For example, survey vessels should engage with local fishermen prior to activities to understand local dynamics, conditions, and practices to avoid or minimize conflict. In addition to siting these projects away from areas with the most intensive fishing activities, ACP supports investing directly in coastal communities. ACP has proposed the creation of a regional fisheries compensation fund that could be funded through bidding credits in upcoming BOEM lease sales (including in the Gulf of Maine).[13] While such a regional compensation fund would primarily address demonstrated adverse effects to those who make a living through commercial or recreational fishing, the fund could also be used to promote co-existence in an innovative manner by providing grants for equipment that can help fishermen adapt to fishing in and around wind turbine generators and provide relief to affected onshore businesses (e.g., seafood processors).

C. Transmission and Port Access Considerations

We urge BOEM to consider transmission issues early in the leasing process, given the limited number of potential interconnection points along the Gulf of Maine and potential distance from shore of leases. This could mean planning early for potential rights-of-way for mesh or backbone transmission. Maine currently has two primary locations ideal for their interconnection transmission capacity, the Wiscasset and Yarmouth substations. Though additional onshore transmission upgrades will be necessary to reduce congestion and curtailment, these two facilities represent a strong base to build upon. However, this is only the first step toward building a truly renewable energy source grid, and it is imperative to plan for transmission infrastructure that can delivery large amounts of offshore wind power not only to densely populated centers on the coast but all of New England.

In addition, Stellwagen Bank National Marine Sanctuary ("NMS") presents a unique challenge to transmission from Gulf of Maine offshore wind projects because it blocks some of the most cost-effective, direct offshore export cable corridor paths to available points of interconnection in the Boston Harbor and Massachusetts Bay areas. This concern applies to both traditional generator lead line and potential regional coordinated transmission planning processes. Siting offshore wind transmission in national marine sanctuaries presents a major legal risk as BOEM is statutorily barred from issuing rights-of-way and easements in such areas under the Outer Continental Shelf Lands Act ("OCSLA"). *See* 43 U.S.C. 1337(p)(10) and it is uncertain whether the National Oceanographic and Atmospheric Administration ("NOAA") can substitute its own authority as described further in ACP's comments on the proposed Chumash NMS.[14] ACP encourages BOEM to thoroughly coordinate and strategically plan with all concerned parties to ensure offshore wind and transmission developers are able to avail

[12] The recommendations are available at https://www.maineoffshorewind.org/wp-content/uploads/2022/08/FWG-FINAL-Recommendations-_07_21_22_rev.pdf. The group was comprised of individual fishermen who participate in various fisheries throughout State and federal waters, fishing industry association leaders, wholesale dealers and processors, non-governmental organizations that support the fishing community, and a municipal official from a fishing-dependent community.

[13] Available at https://www.regulations.gov/comment/BOEM-2022-0033-0071 and https://www.regulations.gov/comment/BOEM-2021-0083-0084

[14] Available at https://www.regulations.gov/comment/NOAA-NOS-2021-0080-1191

themselves of all feasible grid interconnection points. This could include working with state and local governments to facilitate the siting of cables that avoid Stellwagen Bank NMS, as well as providing technical support to Congress as it considers amending OCSLA to allow BOEM to issue rights-of-way and project easements through national marine sanctuaries.

BOEM should also consider distance to relevant construction and operations and maintenance (O&M) ports before restricting potential lease areas. The effect of vessel transit between ports and an offshore energy facility has a significant effect on a project's cost (largely due to increased vessel needs and construction and maintenance timeframes) and potential environmental impacts (largely due to increased seabed disturbance and vessel hours). We also note that floating offshore wind construction requires very different port usage from fixed-bottom offshore wind.[15] Therefore, ports such as Salem, MA that are currently being redeveloped for fixed-bottom offshore wind projects in Southern New England[16] may not be readily repurposed for use in the Gulf of Maine. The State of Maine has identified locations near Searsport as a leading site in Maine to support development of floating offshore wind in the Gulf of Maine.[17] BOEM should assess what other options are credible for floater assembly, and what options could be developed for O&M ports (e.g., Rockland and Portland). Distance to identified ports should inform BOEM's decisions about selection of call areas within the RFI area.

D. Wildlife Protection and Mitigation Measures

ACP supports the BOEM's data-driven approach to analyzing offshore wind's interaction with biological resources , and we are confident that it will result in BOEM determining the most suitable areas for leasing floating wind. At this early stage, we encourage BOEM to designate sufficiently large call areas to research and collect data needed to make informed decisions about project siting. ACP seeks to avoid prematurely eliminating suitable locations due to uncertain future or currently mitigatable site-specific concerns. It is important to be cognizant that technological developments will inevitably alter how offshore wind projects effect the natural environment. With many years of lease area identification and project development to come, some of today's environmental concerns may no longer be as salient when these projects begin operation.

With respect to marine mammals, ACP first notes that one of the key advantages of floating offshore wind is that construction creates much less noise than fixed-bottom offshore wind due to the relative lack of pile driving activity. Additionally, it is unlikely that a marine mammal of any size would become directly entangled in the moorings of floating offshore wind projects because the mooring components are so much larger than the typical entanglement risk materials.[18] Even so, ACP members want to be part of the solution and have invested significant time, money, and effort into creating technological solutions to enable the industry to operate in the ocean with minimal impacts to the environment. Currently the offshore wind industry and other ocean users are supporting the development of new technologies to reduce vessel strike instances through various projects[19] to advance predictive presence models and tools leveraging oceanographic conditions.[20]The industry is also investing in

[15] Available at https://atb.nrel.gov/electricity/2022/offshore_wind
[16] Available at https://salemsafe.org/2022/02/14/avangrid-renewables-lays-out-future-at-salem-harbor/#:~:text=Salem%20will%20become%20the%20second,continue%20for%20about%20two%20years.
[17] Available at https://www.maine.gov/mdot/ofps/docs/port/MaineDOT%20OSW%20Port%20Infrastructure%20Feasibility%20Study-Concept%20Design%20Report%2011-17-2021.pdf
[18] Available at https://www.sciencedirect.com/science/article/pii/S096456912100096X?via%3Dihub
[19] Available at https://www2.whoi.edu/site/mars/
[20] Available at https://whalesafe.com/

specialized long distance thermal cameras and real-time or near real-time passive acoustic monitoring devices.[21]

ACP is aware that benthic habitat is another issue of concern, but we note that floating wind development results in much less seafloor disturbance than fixed bottom wind, which typically causes direct habitat loss of less than 1% of the wind farm area.[22] This is the case for two key reasons. First, wind turbine generators only touch the seafloor via mooring line anchors which have a much lighter footprint than pile-driven or gravity-based foundations. Second, interarray cables may not need to be buried under the seafloor at all, and much of the export cable is likely to rest on the sea floor.

Finally, ACP believes offshore wind can be developed responsibly with respect to the regional avian and bat populations. We recognize the importance of the hundreds of species of birds and six species of bats that are known to occur in the Gulf of Maine throughout the year.[23] Seabirds, seaducks, divers, shorebirds, songbirds, some raptor species, and bats are known to migrate along the coast or offshore areas over the Gulf of Maine, though most occur only during migratory periods.[24] The federally listed species that may occur over the Gulf of Maine are much less numerous and include the threatened piping plover (Charadrius melodus), roseate tern (Sterna dougallii), rufa red knot (Calidris canutus rufa), and northern long-eared bat (Myotis septentrionalis). Six of eight bat species known to occur in Maine have been documented off the Atlantic Coast, primarily during migratory periods. Bats have been documented up to 87 nautical miles offshore.[25]

With the above bird and bat species in mind, the NOAA National Centers for Coastal Ocean Science Marine-life Data and Analysis Team Regional bird abundance and distribution models indicate relatively higher densities of birds along the coast and islands compared to areas further offshore in Gulf of Maine, and therefore we expect many of the offshore wind projects to have minimal impact on the majority of the above migration processes.[26] Additionally, marine birds generally require relatively

---

[21] Available at https://www.vineyardwind.com/press-releases/2019/5/19/vineyard-wind-launches-search-for-acoustic-monitoring-systems-to-help-safeguard-critically-endangered-north-atlantic-right-whales

[22] Available at https://tethys.pnnl.gov/sites/default/files/summaries/SEER-Educational-Research-Brief-Benthic-Disturbance.pdf

[23] *See* Hatch, S.K., E.E. Connelly, T.J. Divoll, I.J. Stenhouse, and K.A. Williams. 2013. Offshore Observations of Eastern Red Bats (Lasiurus borealis) in the Mid-Atlantic United States Using Multiple Survey Methods. PLoS ONE 8(12): e83803; Pelletier, S.K., K. Omland, K.S. Watrous, and T.S. Peterson. 2013. Information Synthesis on the Potential for Bat Interactions with Offshore Wind Facilities – Final Report. Herndon, VA: U.S. Department of the Interior, Bureau of Ocean Energy Management, Headquarters. OCS Study BOEM No. 2013-01163. 119 pp.; and Sjollema, A.L., J.E. Gates, R.H. Hilderbrand, and J. Sherwell. 2014. Offshore Activity of Bats along the Mid-Atlantic Coast. Northeastern Naturalist 21(2):154-163.

[24] *See* DeSorbo C. R., K. G. Wright, I. Johnson and R. Gray. 2012. Bird migration stopover sites: ecology of nocturnal and diurnal raptors at Monhegan Island. Submitted to the Maine Outdoor Heritage Fund, Pittston, Maine, and the Davis Conservation Foundation, Yarmouth, Maine. Biodiversity Research Institute, Gorham, Maine. 43 pp plus appendices; Leppold, A. J., 2016. Behavioral ecology of landbird migrants in a complex and changing flyway system: The Gulf of Maine. Ph.D. dissertation, The University of Maine, Orono, ME, United States; Stantec Consulting Services, Inc. (Stantec). 2016. Long-term Bat Monitoring on Islands, Offshore Structures, and Coastal Sites in the Gulf of Maine, Mid-Atlantic, and Great Lakes – Final Report. Prepared for the U.S. Department of Energy. 171 pp.

[25] Stantec 2016 at 171.

[26] *See* Curtice, C., J. Cleary, E. Shumchenia, and P.N. Halpin. 2019. Marine-life Data and Analysis Team (MDAT) technical report on the methods and development of marine-life data to support regional ocean planning and management. Available at: http://seamap.env.duke.edu/models/MDAT/MDAT-Technical-Report-v1_1.pdf

shallow areas for foraging due to their preferred food sources (primarily small marine fish and/or crustaceans) and therefore shallow areas seaward of the continental shelf, including many of those ACP believes would be suitable for call area designation, tend to have relatively fewer concentrations of birds.[27] During the summer breeding period, coastal islands in Gulf of Maine host 15 different species of colonial nesting seabirds, including the federally threatened roseate tern and the state threatened Atlantic puffin (Fratercula arctica). 90 percent of U.S. Atlantic puffins breed on three Maine Coastal Island National Wildlife Refuges.[28] A relatively small proportion of the northeastern population of roseate terns nest on islands off the coast of Maine and approximately 90 percent of the population breeds on islands off Cape Cod, Massachusetts and Long Island, New York.[29] During the breeding season, Atlantic puffin forage in relatively shallow waters, generally within 3 nautical miles of their breeding colonies.[30] Nesting roseate terns may travel up to 16 nautical miles from colonies to forage in shallow waters, typically at the mouths of rivers or shallow shoals.[31] Because of these known, predicable, and established bird and bat patterns ACP is confident that BOEM will be able to site offshore wind call areas in places that minimize impact to species of concern while maintaining an area large enough to generate at least 10 GW of offshore wind energy.

In the context of wildlife preservation, it is important to reiterate that the Gulf of Maine is warming faster than 96 percent of world's oceans.[32] The coastline and coastal islands which support nesting shorebirds and seabirds are at risk of effects of rising sea level due to climate change. Rising sea level could reduce or eliminate many seabird nesting areas and warming waters could impact the availability and distribution of prey fish which could negatively impact breeding success. Offshore wind is an important source of renewable energy which when developed sufficiently will help offset impacts associated with climate change on these and other wildlife species. BOEM's aerial digital surveys within Gulf of Maine will be initiated this winter and will help inform potential risk to birds and other taxa within Areas of Interest for offshore wind development.

Agency consultations and risk assessment will inform proper wind development siting decisions to reduce risk of collision or displacement effects on birds and bats. Designating larger call areas will enable BOEM and other agencies to collect more data and study a more complete selection of the Gulf of Maine enabling better decision making while allowing flexibility of the location of lease areas and preserving enough lease area for more than 10 GW of offshore wind energy generation. ACP members are also supportive of impact minimization measures, such as limiting nighttime lighting on above water structures, to avoid attraction of nocturnal migrants. ACP is committed to all effective and reasonable precautions to further reduce the limited impacts to avian and bat species.

---

[27] *See* Goudie, R. I., G. J. Robertson, and A. Reed (2020). Common Eider (Somateria mollissima), version 1.0. In Birds of the World (S. M. Billerman, Editor). Cornell Lab of Ornithology, Ithaca, NY, USA. Available at: https://doi.org/10.2173/bow.comeid.01; Lowther, P. E., A. W. Diamond, S. W. Kress, G. J. Robertson, K. Russell, D. N. Nettleship, G. M. Kirwan, D. A. Christie, C. J. Sharpe, E. F. J. Garcia, and P. F. D. Boesman (2020). Atlantic Puffin (Fratercula arctica), version 1.0. In Birds of the World (S. M. Billerman, Editor). Cornell Lab of Ornithology, Ithaca, NY, USA. Available at: https://doi.org/10.2173/bow.atlpuf.01; *see generally* Nisbet et al. 2014.

[28] USFWS. 2022b. FWS Focus: Roseate Tern. Available at: https://fws.gov/species/roseate-tern-sterna-dougallii-dougallii

[29] Ibid.

[30] Lowther et al. 2020

[31] Ibid.

[32] Available at https://www.washingtonpost.com/weather/2022/01/12/gulf-maine-record-warm-2021/

E. BOEM's Transparent and Data-Based Floating Offshore Wind Development

ACP appreciates BOEM's transparent, data-based approach for developing draft WEAs in Gulf of Mexico and recommends that it continue to use this methodology in the Gulf of Maine. The narrative that BOEM provided in the Gulf of Mexico ID Memo, along with the maps and a detailed explanation of its methodology for developing each WEA helped efficiently communicate the reasoning behind BOEM decisions. We applaud BOEM for continuing this approach in the Gulf of Maine, and in other future lease sales.[33]

However, ACP cautions BOEM to avoid basing its deconfliction decisions in the Gulf of Maine on assumptions regarding floating offshore wind designs and impacts. Floating wind is still in its early phases, and we are years from determining which foundations, mooring lines, and anchor types are going to be most appropriate for the Gulf of Maine from both engineering and environmental impact perspectives. ACP recommends that BOEM identify any concerns or opportunities that may require further study. We also support BOEM's use of new technology to incorporate industry data and data from other sources to evaluate possible suitable areas for offshore wind development, including with ENC, AC GIS Pro tools, and Gulf of MaineAPPS.

ACP encourages BOEM to continue to demonstrate how it evaluates categorical datasets. This practice will provide all stakeholders with certainty and allow interested parties to submit the data that supports the best available science. We support BOEM asking for data to inform a modeling report so that these details can be corroborated prior to the lease sale and other activities. Due to the diversity of fisheries identified, we support BOEM's intent to continue to study the exact types of fishing and areas that are of most concern and to work with industry and the fishing community to mitigate any potential concerns. ACP member experience in the Atlantic demonstrates impacts are best minimized at the stage when final facility attributes are determined (at the COP stage).

III. Conclusion

BOEM can play a pivotal role in catalyzing floating offshore wind development in the Gulf of Maine by issuing enough lease acreage during this process—at least 10 GW, if not more— to create a pipeline of projects that can support a new domestic supply chain and tens of thousands of clean energy jobs. ACP believes this can be done while remaining sensitive to the concerns of commercial fishermen who have historically driven the economy of the Gulf of Maine and unique environmental conditions that make the region such a special place. We urge BOEM to continue to move the Gulf of Maine leasing process forward efficiently in order to provide the opportunity for future growth of commercial interest in offshore wind generation in the region. We look forward to working with BOEM to responsibly develop offshore wind in the Gulf of Maine.

Respectfully,

Peter Jones
Associate Counsel
Pjones@cleanpower.org

[33] Available at https://www.boem.gov/newsroom/notes-stakeholders/boem-enhances-its-processes-identify-future-offshore-wind-energy-areas

Alexandra Carter
Director, Environment & Wildlife Policy Offshore
Acarter@cleanpower.org

Josh Kaplowitz
Vice President, Offshore Wind
Jkaplowitz@cleanpower.org

American Clean Power Association