July 27, 2020

Program Manager
Office of Renewable Energy
Bureau of Ocean Energy Management
45600 Woodland Road
Sterling, Virginia 20166

Re: Vineyard Wind COP Supplement to the Draft EIS, FR 2020-12822

I write on behalf of the National Ocean Industries Association or NOIA. An almost 50 year old organization, we represent all segments of the offshore energy industry. This includes traditional fossil fuels such as oil and gas, primarily in the Gulf of Mexico, as well as important new sources of energy like offshore wind. Further, our members include not just energy developers but also the businesses - large and small - who do the work of building, supplying and maintaining these projects.

As an organization, NOIA *strongly* supports ongoing attempts to build new offshore wind resources in federal waters. We believe projects like the 800 megawatt Vineyard 1—with its potential to bring clean, affordable energy to nearly a half a million homes and businesses in southern New England—are vital to the economic growth of this country and efforts to meet environmental goals for the 21st century. According to 2019 estimates, we have a $70 billion[1] market off America's coasts for offshore wind in the next 10 years. That means clean, reliable and affordable energy in places like New England and New York where building infrastructure onshore is famously difficult and industrial growth has sometimes been hard to come by and energy costs can be prohibitively high.

Portions of southern New England have long faced economic difficulties given the flight of legacy industries and declining populations.[2] In fact, even before the COVID-19 pandemic the Massachusetts economy was in a modest decline, despite a nationwide economic expansion.[3] At the same time, Rhode Island was ranked in 2019 *dead last* for economic opportunity[4] for the fifth time, with analysts pointing to aging infrastructure, low economic growth, and high energy prices. Now, in the midst of the global COVID-19 pandemic, states like Massachusetts have in recent weeks had an unemployment rate of over 16%.[5] Given this, southern New England is primed and ready for a new economic opportunity such as what is offered by offshore wind—and thankfully the potential scope of the economic benefits are enormous.

The Massachusetts Clean Energy Center (MassCEC), a state economic development agency, has identified a host of potential economic opportunities within the commonwealth related to

[1] https://www.cnbc.com/2019/12/13/us-has-only-one-offshore-wind-farm-but-thats-about-to-change.html
[2] https://www.bostonfed.org/publications/community-development-discussion-paper/2016/new-englands-manufacturing-legacy-and-neighborhood-change-does-history-matter.aspx
[3] https://www.enterprisenews.com/news/20191030/mass-economy-shrinks-slightly-amid-labor-force-issues
[4] https://www.cnbc.com/2019/07/09/why-rhode-island-is-the-worst-state-for-business-in-2019.html
[5] https://www.bostonherald.com/2020/06/23/dismal-unemployment-rate-in-massachusetts-not-the-end-of-the-story/

offshore wind. This includes not just ports used for staging and construction but also cables, secondary steel, substations, monopile and gravity foundation manufacture and assembly sites, nacelle, tower and blade construction and assembly sites and also component storage.[6] Even sites that don't see new jobs from Vineyard 1 could benefit from future projects as the scope of the offshore wind opportunities in New England develop.

To drive that point home, we are already seeing efforts to increase employment in offshore wind across the region. We know, for example, that a wind-centric jobs fair is planned for the weeks ahead,[7] depending on safety given the COVID-19 outbreak. Bristol Community College in southern Massachusetts has also created[8] a training program related to offshore wind workforce development which we suspect will be replicated at other schools around the country. As they describe it, the school's National Offshore Wind Institute offers "basic and advanced safety and technical training programs to prepare workers for jobs in construction, deployment, operations and maintenance of offshore wind farms."[9] We have also seen a NOIA member, Ørsted, announce the creation of an innovation center[10] in Providence, Rhode Island to foster next-generation entrepreneurs in offshore wind business. Given the state's current economic morass, the possibility of a startup accelerator in addition to other jobs and investment are *significant*. There will be very real economic benefits to the region related to offshore wind, possibly beyond what BOEM is considering.

It is also clear that offshore wind will bring benefits far beyond New England. As one very senior government official from Louisiana joked to NOIA members earlier this year, there will be no shortage of "Boudreauxs and Thibodeaus" heading to states like Massachusetts and Rhode Island to help with the construction of these projects. In fact, many of our member companies along the Gulf Coast are interested in the opportunities presented by offshore wind. For example, NOIA member company Gulf Island Fabrication Inc. of Houma, Louisiana created the steel foundations for the Block Island Windfarm.[11] The Chairman of NOIA's main working group on renewable energy resides not in New England but in Houston, helping guide a company with a long history in traditional fossil fuels as it looks to renewable energy. We know that our member companies with decades of experience working in offshore oil and gas have the technical know-how, training and equipment to work on the initial wave of offshore wind projects, alongside local companies and local labor. Further adding to the national impacts of local projects, building offshore wind will also hopefully offset some of the Russian gas that is occasionally shipped into Boston harbor[12] to provide energy. Offshore wind is an incredible opportunity not just for the people in communities across New England but also for national security and a national supply chain hungry for new business.

All these opportunities will only come to pass, however, if we get the regulatory process right and complete this Environmental Impact Statement. We at NOIA applaud the Bureau for taking

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[6] https://www.masscec.com/massachusetts-offshore-wind-ports-infrastructure-maps-0
[7] https://www.windpowerengineering.com/offshore-wind-conference-to-launch-national-job-fair/
[8] http://www.bristolcc.edu/about/pressandmedia/nationaloffshorewindinstitute/
[9] http://www.bristolcc.edu/about/pressandmedia/nationaloffshorewindinstitute/
[10] https://us.orsted.com/news-archive/2020/01/orsted-to-open-new-innovation-hub-in-rhode-island
[11] https://www.workboat.com/blogs/the-noreaster/offshore-wind-industry-looks-to-gulf-expertise/
[12] https://www.eenews.net/stories/1060076897

this next step by release the supplemental report. We *also* applaud BOEM for recognizing that the environmental impacts of this project are manageable.

In almost every area reviewed in the Draft Supplemental, we see a major project bringing relatively inconsequential negative impacts to the area. Many of the negative impacts mentioned by BOEM would be temporary—such as more significant lighting or noise during construction. The limited construction season would be a temporary negative for a long-term net positive of jobs and affordable clean energy.

Similarly, we agree with BOEM's finding in the draft that the impact on marine mammals would generally be negligible. What moderate impacts may occur during construction, we at NOIA have been deeply impressed by efforts of companies involved in offshore wind to mitigate such impacts. The company Vineyard Wind, for example, signed what a leader in the environmental community called an "unprecedented agreement"[13] to ensure species protection—particularly the critical North Atlantic Right Whale—during construction. Further, the offshore wind industry has shown a dedication to reducing impacts on marine mammals. Vineyard Wind has also launched the Offshore Wind Challenge[14] dedicated to finding ways to accelerate innovations around the protection of marine life in areas with offshore wind project plans.

Another of our member companies, Ørsted, has partnered with the Woods Hole Oceanographic Institution and a group of universities to launch the Ecosystem and Passive Acoustic Monitoring project—explicitly designed to better understand the presence of key mammals.[15] Remarkably, this technology could also prove to be a boon for weather and storm forecasting for coastal communities, improving quality of life and even public safety in New England well away from the proposed offshore wind areas. Further, their innovation hub mentioned previously has been discussed as a potential launching point for novel technologies dedicated to marine mammal protection.[16] Given all of this, we not only agree that the impact on marine mammals in the area will be manageable, but also believe that those impacts will be lessened in the future as new technologies and techniques are developed to further protect species.

Other impacts noted by BOEM, like the physical presence of the towers, bring their own *positive* impacts. We agree with the DSEIS that there will be some level of benefit related to these structures.[17] In fact, we have seen in the nearby Block Island area that wind turbines can *increase* tourism.[18] We have seen European projects for offshore wind prove popular with tourists as well; for example the Scroby Sands windfarm off the shores of the United Kingdom has an onshore visitor center that hosts tens of thousands of students and others each year.[19] Wind farms built offshore Nysted, Denmark have attracted pleasure-craft, with the then-mayor commenting that more sailboats have come to the town since the windfarm was built and the harbormaster

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[13] https://www.nrdc.org/experts/francine-kershaw/landmark-offshore-wind-agreement-protects-right-whales
[14] https://www.vineyardwind.com/offshorewindchallenge
[15] https://www.windpowerengineering.com/orsted-academic-partnership-will-assist-in-protecting-right-whales-in-u-s-offshore-wind-portfolio-waters/
[16] https://www.providencejournal.com/news/20200302/wind-power-developer-opens-2nd-ri-office
[17] https://www.boem.gov/sites/default/files/documents/renewable-energy/Vineyard-Wind-1-Supplement-to-EIS.pdf page 3-9
[18] https://www.sciencedirect.com/science/article/ abs/pii/S092876551830290 2?via%3Dihub
[19] https://www.group.rwe/en/our-neighbourhood/rwe-erleben/visitor-centres/scroby-sands-visitor-centre

discussing how popular the ability to sail inside the wind energy area has been with tourists and boat owners.[20] Clearly, the global experience and even limited local experience show that we should not assume *negative* impacts from wind farms for the domestic tourism economy.

We also know global studies have found that offshore wind can increase the population of certain fish species.[21] For example, studies in Europe have found that "researchers found evidence that the wind turbines not only attracted fish, providing both shelter and food (from the organisms that grew on the turbines), but also served a role in their life cycle, with young fish attracted to the wind farm where they would grow, then leave to spawn, and then other juveniles would come to the wind farm to grow."[22]

Even those environmental impacts that have proven thornier have seen Vineyard Wind working hand-in-glove with local officials to mitigate impacts and allay concerns[23]. One example of this can be found in the agreement for the cable landing onshore at Covell's Beach in Barnstable, where project developers agreed to improve the beach area and even improve local infrastructure to save the community money in the future.[24] This type of cooperation is becoming a hallmark of offshore wind and we expect that this trend will continue as future projects are brought online.

For a new and significant infrastructure project that will bring electricity to communities across the region, we think this is an incredibly "light touch" in terms of local impacts. We know that building new energy capacity with other forms of energy like coal in the communities of coastal New England would bring *far* more significant negative impacts[25]. We can think of few more environmentally sustainable ways to power 400,000 homes and businesses than by allowing projects like Vineyard 1 to move forward.

Of course though, there are some in the fishing community who have significant concerns despite the positive impact on fish populations described above. We at NOIA respect that fact and agree that fishing is—and will remain—vital to New Bedford, Point Judith, and beyond. That is why NOIA *firmly* agrees with the concept of a uniform layout, despite the fact that an even, 1 nautical mile layout as captured by Alternative D-2. A uniform layout such as this has been generally agreed to by the industry, despite the fact it would reduce density of turbines and the ability of an area to produce energy. Quite simply, this type of layout best balances the interests of *all* who want to use federal waters and provides a clear path forward for historic fishing communities. We defer to the experts at the Coast Guard who have reviewed a uniform, well-spaced layout for offshore wind projects. Just this year in the Port Access Route Studies, we were told that:

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[20] https://www.offshore-stiftung.de/sites/offshorelink.de/files/documents/Offshore_Stiftung_2013_04SBO_SOW_tourism_study_final_web.pdf

[21] https://www.sciencedaily.com/releases/2012/04/120410093318.htm

[22] https://seagrant.gso.uri.edu/offshore-renewable-energy-improves-habitat-increases-fish/

[23] https://vineyardgazette.com/news/2019/10/01/edgartown-vineyard-wind-settle-undersea-cable-dispute

[24] https://nawindpower.com/vineyard-wind-gets-green-light-for-cape-cod-transmission

[25] https://toxtown.nlm.nih.gov/sources-of-exposure/power-plants

> USCG has determined that if the MA/RI WEA turbine layout is developed along a standard and uniform grid pattern, formal or informal vessel routing measures would not be required as such a grid pattern will result in the functional equivalent of numerous navigation corridors that can safety accommodate both transits through and fishing within the WEA. While these navigation corridors would be smaller than those suggested by some commenters, the USCG believes they should be sufficient to maintain navigational safety and provide vessels with multiple straight-line options to transit safely throughout the MA/RI WEA.[26]

Further, several of our members were involved in commissioning a report by W.F. Baird and Associates, which made key findings that fit hand-in-glove with existing work done by BOEM and the U.S. Coast Guard. Critically, W.F. Baird concluded that an east/west 1 nautical mile layout (such as Alternative D-2) would create 40 individual transit lanes. These lanes could accommodate ships up to 400 feet. Even many fishing vessels that already skirt the edges of the area in question could simply go around it and adding perhaps only 30 minutes to their travel time. For an area that belongs to the people of the United States and not any one industry or stakeholder, this clearly appears to be a common-sense compromise.

We *would* though like to express caution regarding one point in particular: Alternative F. As you know, this alternative would establish up-to 4 nautical mile-wide transit lanes through the proposed wind energy areas. BOEM's analysis clearly says that this change would increase the impact-producing factors (IPFs) of offshore wind and expand the area we are looking at to produce energy significantly.[27] Critically, we agree with the Coast Guard's assessment that wider fishing lanes, as contemplated by Alternative F, have the potential to be a safety hazard. As the PARS found, "most traffic would be funneled into the corridors thereby increasing traffic density and risks for vessel interaction."[28]

NOIA's member companies have nearly half a century of experience with running vessels through multi-use areas, primarily in the Gulf of Mexico. We as an organization do not believe that an arbitrary, limited number of corridors for a variety of ships would be a prudent approach to routing vessel traffic, especially for ships which will come from different fleets, different ports, and different industries. Congested transit lanes can be complicated enough for even the largest commercial vessels, providing no shortage of ink spilled on how to reduce deadly incidents.[29] Subjecting commercial fishermen, the Coast Guard, recreational fishermen, pleasure-boaters, and others to this unnecessarily would be a mistake.

Finally, regarding spacing, we would caution the Department not to "split the baby" and adopt an approach that encompasses *both* Alternative D2 and Alternative F—even spacing with additional transit lanes. Even beyond the arguments above expressing caution on Alternative F, we think

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[26] https://www.federalregister.gov/documents/2020/05/27/2020-11262/port-access-route-study-the-areas-offshore-of-massachusetts-and-rhode-island

[27] https://www.boem.gov/sites/default/files/documents/renewable-energy/Vineyard-Wind-1-Supplement-to-EIS.pdf (SEIS pg 144 of PDF)

[28] https://www.federalregister.gov/documents/2020/05/27/2020-11262/port-access-route-study-the-areas-offshore-of-massachusetts-and-rhode-island

[29] https://www.marineinsight.com/marine-navigation/how-to-handle-a-ship-in-congested-high-traffic-waters/

this mixed approach provides unique threats and drawbacks. We absolutely agree with BOEM that a mixture of transit lanes—some 1 nm in an east/west approach with other somewhat wider lanes mixed in at odd angles is a recipe for potential disaster. As BOEM staff found, "The differing orientations of the transit lane and WTG layout could increase navigational complexity for vessels operating within the area including military and national security vessels."[30] One need only have watched unfamiliar drivers attempt to navigate Washington, D.C.'s uniform street-grid and suddenly find themselves faced with traffic from a diagonal road like (ironically) Massachusetts Avenue to realize the chaos that can ensue. While Pierre L'Enfant's broad boulevards at least serve an aesthetic purpose, the complication of broader transit lanes at sea bisecting dozens of other, sufficiently-wide ones will only add to the danger for the countless mariners using the waters inside the wind energy area. A mixed-approach would bring together the "worst of both worlds" in NOIA's opinion; it reduces the density of wind turbines with the 1x1nm approach—already a compromise by the wind industry—and *then* adds unnecessary, potentially hazardous intersecting thoroughfares to *further* reduce that density and add to the complexity for mariners.

NOIA believes that offshore wind and commercial fishing can co-exist in a way that provides a living—and electricity—to people across the region. We also believe that offshore wind and the people and marine life that call New England home can thrive together. We encourage BOEM to recognize this, recognize the manageable impacts of offshore wind, and help these projects move forward by finalizing this Environmental Impact Statement as expeditiously as possible and without layering on alternatives that undercut America's path towards global leadership on offshore wind.

Very respectfully,

Erik Milito
President
National Ocean Industries Association

[30] https://www.boem.gov/sites/default/files/documents/renewable-energy/Vineyard-Wind-1-Supplement-to-EIS.pdf (3.14.2.4)