The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Maura T. Healey
GOVERNOR

Kimberley Driscoll
LIEUTENANT
GOVERNOR

Rebecca L. Tepper
SECRETARY

Tel: (617) 626-1000
Fax: (617) 626-1081
http://www.mass.gov/eea

November 20, 2023

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

**Re: Docket No. BOEM–2023–0054: Draft Wind Energy Areas – Commercial Leasing for Wind Power Development on the Gulf of Maine Outer Continental Shelf (OCS)**

Dear Mr. Jylkka:

The Massachusetts Executive Office of Energy and Environmental Affairs (EEA) respectfully submits the following comments to the Bureau of Ocean Energy Management (BOEM) in response to the request for comments on the Draft Wind Energy Area (WEA) for offshore wind in the Gulf of Maine. These comments, as with our previous letters on the Call for Information and Nominations (Call Area) and Request for Information (RFI), acknowledge the diverse array of important existing maritime uses, habitats, and species, and recognize that a purposeful, data-driven process that includes stakeholder engagement is imperative to the sustainable siting of offshore wind in this already busy offshore space. The comments provided below incorporate input received through conversations with stakeholders and with subject matter experts from my agencies and offices. We look forward to continuing to provide feedback to inform the Final WEA(s) and leasing process through Task Force meetings, public engagement sessions, and collaborative efforts with our fellow Gulf of Maine states, stakeholders, and other federal agencies.

With this letter, we convey the following key points which are later described in more detail:

- The development of floating offshore wind in the Gulf of Maine is critical to ensure the Commonwealth achieves carbon emission reduction targets to minimize the adverse impacts we are already witnessing in our ocean and coastal ecosystems including warming ocean waters, sea level rise, and increased frequency and intensity of coastal storms.
- Existing ocean resources and uses including commercial and for-hire fisheries and the economic value they provide to the Commonwealth are critically important to our economy, history and culture.
- The planning and siting process conducted by BOEM has been robust and informed by best available data and significant stakeholder engagement. It has taken into consideration the many marine uses and environmental concerns that are associated with a proposed area's potential for commercial renewable energy development.
- The Commonwealth supports an equally robust planning process to identify cable corridors through federal waters that will be useful to the offshore wind industry while also minimizing impacts to existing resources and uses.
- The designation of the Final WEAs should advance sufficient areas of the Draft WEA located close to shore to support the early phases of commercial scale floating offshore wind by reducing costs and barriers to entry as the industry becomes established.
- BOEM should continue to examine the possibility of leasing the area northwest of Cashes Ledge, particularly in light of possible changes to the final location of the navigational fairway and/or uses within LMA1.
- Final WEAs for the initial auction should be of sufficient size to facilitate the development of at least 13 GW of offshore wind to support offshore wind targets for Maine and Massachusetts, with additional area made available in subsequent auctions.
- Through a data-driven planning process and subsequent project siting and design, potential effects on other ocean resources and uses including the fishing industries of the Gulf of Maine states may be significantly reduced.
- BOEM and lessees should work with states and other local and regional organizations to develop appropriate minimization and mitigation strategies to offset impacts to protected species.
- The delineation of the Draft WEA was responsive to concerns about potential effects on the Massachusetts groundfish fleet. The Draft WEA excludes the areas of highest fishing productivity in Wilkinson Basin, preserving the fishing grounds from which 86% of all Gulf of Maine fisheries revenue is generated and 78% of Multispecies Groundfish revenue.
- To minimize overlap with the highest value groundfish fishing areas in the Draft WEA, BOEM should seek to site Final WEA(s) outside the area identified as the top 10% of multispecies groundfish revenue (see attached map), and where VMS annual mean polls (filtered to ≤4 knots) exceed 9 per $km^2$.

Sustainably advancing offshore wind to support decarbonization is a priority shared by the Commonwealth and the Biden-Harris administration. Massachusetts strongly supports the Biden-Harris Administration's ambitious goals to achieve 30 gigawatts (GW) of offshore wind by 2030, 15

GW from floating offshore wind by 2035, and commercial leasing in the Gulf of Maine in the fall of 2024, while reducing costs of floating offshore wind. These national goals align with the state requirement of achieving net-zero carbon emissions in Massachusetts by 2050, which is expected to require at least 23 GW of offshore wind. In order to achieve these requirements, we ask that BOEM continue to move purposefully and expeditiously through the planning process to identify lease areas in the Gulf of Maine, while continuing to consider the complex siting challenges.

As a national leader in offshore wind, Massachusetts continues to make significant progress and advancements in energy procurements, workforce development, growth of the supply chain, funding for port infrastructure, and collaborative work with fellow northeast and New England states to address the challenges of regional transmission, fisheries compensatory mitigation, and regional-scale research on offshore wind impacts. Offshore wind energy development is a significant component of renewable energy portfolios in the northeast including the Commonwealth of Massachusetts, where it is expected to be the cornerstone of clean electricity generation. We currently have an open request for proposals (RFP) for a fourth solicitation for offshore wind which requests bids for projects up to 3.6 GW and allows for the selection of projects that maximize our current statutory authority for 5.6 GW in offshore wind procurements. Accompanying this solicitation, we have entered into a Memorandum of Understanding (MOU) with Rhode Island and Connecticut to coordinate on current offshore wind energy procurements to benefit ratepayers in all states and to support the nascent offshore wind industry. The open solicitation and related MOU maintain the legislatively required schedule of offshore wind procurements to ensure timely delivery of offshore wind to Massachusetts ratepayers and support our requirement to achieve net zero emissions by 2050. However, for Massachusetts and other states to meet our decarbonization requirements and legislative mandates, it is critical that BOEM hold an offshore wind auction for the Gulf of Maine in the fall of 2024.

We commend BOEM on its efforts to date and on its commitment to a robust planning and siting process of commercial leases in the Gulf of Maine. BOEM has coordinated closely with the three states throughout the process and has conducted a significant amount of public engagement, including meetings, forums, and small group discussions with commercial and for-hire recreational fisheries across the spectrum of gear types, ports, and interests, as well as environmental groups, shipping and maritime interests and many others. We strongly support BOEM's release of the Draft WEA for public review and comment, acknowledging that this step is not required under its regulations and that by providing the maps and detailed information regarding the spatial modeling, analysis, and other factors that were utilized to inform the designation process, BOEM continues to demonstrate a commitment to transparency and robust engagement. The Draft WEA identified by BOEM was informed by this engagement and through the development, application, and interpretation of a spatial suitability model developed by the National Oceanic and Atmospheric Administration's (NOAA) National Centers for Coastal Ocean Science (NCCOS) that utilized 98 data layers representing the major ocean sectors of the Gulf of Maine including natural and cultural resources, wind, fishing, and industry and operations.

**Comments regarding features, activities, mitigations, or concerns within or around the Draft WEA and Secondary Areas**

*Secondary areas*

In addition to identifying the Draft WEA using a comprehensive geospatial model, in conjunction with NOAA/NCCOS, BOEM also identified three Secondary Areas for Further Analysis (Secondary Areas) to receive comments on whether these areas should be further evaluated for Final WEA(s). Two of these Secondary Areas (Areas A and B) are identified by the NCCOS modeling effort as highly suitable but excluded from the WEA with the rest of Lobster Management Area 1 (LMA1). A third Secondary Area (Area C) was identified as an area of relatively high suitability within the U.S. Coast Guard's draft Gulf of Maine navigational fairway. Absent the fairway designation, we understand that the area would have received more developer nominations and presumably would have been identified in the NCCOS model output as suitable and included as a part of the Draft WEA. With the new information generated by the planning and siting process for the WEAs, BOEM and the USCG should consult and coordinate to consider whether the position of the final navigational fairways could be adjusted slightly to accommodate suitable wind energy development areas to the east of LMA1, including Secondary Area C, an area to the west/northwest of the Cashes Ledge Closure, and other areas that are now or may become suitable according to the best available data.

Secondary Areas A and B are contiguous areas within LMA1 that were identified by the NCCOS model as highly suitable areas for offshore wind, but that were removed from the Draft WEA due to location within LMA1. In addition to Secondary Areas A and B, a third area of approximately 47,000 acres off the coast of Massachusetts that is contiguous with grid cells 4A, 5A, and 4B was removed from the model output when the Draft WEA was delineated but was not given a Secondary Area designation. Although this area and the designated Secondary Areas are among the closest to load centers and possible points of interconnection (POIs), they were removed from the Draft WEA. BOEM should revisit these areas in the next model run and before Final WEA designation. While not strongly advocating for inclusion, we request that BOEM employ data-driven analysis based on fishing activity and revenue, along with consideration of sensitive fisheries habitats, to determine if and when areas falling inside LMA1 and/or the navigational fairway should be leased. Consistent with this data-driven approach, BOEM should leverage new and emerging data regarding lobster fishing activity to inform lease area delineations in LMA1 and/or the navigational fairway.

*Developability*

As BOEM has pointed out in the request for comments, the majority of the Draft WEA is greater than 75 miles from shore, making the use of High Voltage Direct Current (HVDC) export cables more likely than High Voltage Alternating Current (HVAC) because less energy is lost via HVDC cables over longer distances and individual HVDC cables can carry more energy than HVAC cables. Since wind turbine generators produce AC current, an HVDC export cable would require AC/DC converters to be constructed at both offshore locations and at the POI onshore. As part of a high-level study analyzing the integration of clean energy resources, ISO-NE identified several initial

POIs in Massachusetts for offshore wind, including Everett, Boston, and Somerset.[1] At its closest, the western edge of the Draft WEA is approximately 70-80 miles from Everett and Boston, over 100 miles from Somerset, and 50-60 miles from Plymouth and Sandwich. The option to use the less costly HVAC transmission connections for the first project(s) could be an important factor in reducing costs while the supply chain and other necessary industry components are established.[2]

It is critical that several lease areas are located along the western side of the Draft WEA to support the early phases of commercial scale floating offshore wind as the relative cost of floating turbines will be initially higher than fixed bottom. Among the closest and most accessible areas for development is the area located to the northwest of Cashes Ledge closure area extending from grid cells 4A and 4B, through what would be grid cells 3A and 3B, and into grid cell 3C (see attached map). A portion of this area is not in the current Draft WEA but should be considered for the Final WEA(s) due to proximity to POIs and suitability considerations. Much of this area is currently outside both LMA1 and the draft navigational fairways, and it is likely to have received more nominations - and therefore a higher suitability score in the NCCOS model - absent space constraints relative to those perceived conflicts to the north and the closure area to the south. If the southern edge of the USCG Gulf of Maine navigational fairway is adjusted northward before it is finalized, and/or if additional data and analysis in LMA1 demonstrate that coexistence between offshore wind and the lobster fishing industry is viable, then the developable area northwest of Cashes Ledge closure area could be expanded to the north and/or to the west. Though it is likely already favorable for development due to proximity to shore, an increase in the size of this area would likely further increase its economic viability for wind development. BOEM should continue to examine the possibility of leasing the area northwest of Cashes Ledge, particularly in light of possible changes to uses and their footprints in the area.

*Division into Lease Areas*

The Final WEA(s) should be composed of multiple lease areas each capable of supporting an individual commercial-scale project that will foster industry growth and competition and maximize energy generation potential for the Gulf of Maine states. BOEM should use Vessel Monitoring System (VMS) data to refine the Final WEA(s) and proposed lease areas at the aliquot level, to account for and avoid historically successful groundfish tow lines through Wilkinson Basin that run northwest to southeast. In addition, the Final WEA(s) should be constructed around commonly used transit lanes, as determined by VMS and Automatic Information System (AIS) data. For example, Massachusetts fishers have identified an important navigational route from Gloucester to Cultivator Shoal on Georges Bank (see attached map) that is clearly visible in the AIS data. In the development of WEAs in New York Bight, BOEM created 2.44 nautical mile (nm) transit lanes between lease areas OCS-A-0538, 0539 and 0541/0542 via a combination of surface occupancy restrictions within lease conditions and a 1.3 nm (2 aliquot) gap between leases. In the Gulf of Maine, members of the fishing industry

[1] 2050 Transmission Study, ISO-NE at 30-31.
[2] https://www.nrel.gov/docs/fy23osti/86550.pdf

have recommended 3 nm gaps between developable areas to ensure safe navigation in two directions in high traffic areas. Depending on the types of anchoring systems used, a surface occupancy restriction of a given distance between floating wind developments may not effectively create a usable transit lane of that same distance in the way it does for fixed-bottom wind. BOEM should survey the Gulf of Maine commercial fishing industry to determine the optimal spacing between lease areas to enable coexistence with both fixed and mobile gear fisheries. In particular, BOEM should survey Gulf of Maine fisherman with various vessel sizes and gear types to determine optimal lease spacing when floating anchoring systems are in use.

*Energy requirements and Phased leasing*

As described above, Massachusetts requires the deployment of an estimated 23 GW of energy from offshore wind by 2050 to meet decarbonization requirements,[3] which based on modelling and analysis has been generally allocated as approximately 10 GW sourced from the Gulf of Maine and the rest from the existing lease areas off Rhode Island and Massachusetts, the New York Bight, and potential future deepwater wind energy areas to the south and east off Massachusetts and New York. The availability of lease areas with sufficient capacity to accommodate the Commonwealth's identified offshore wind energy needs is critical to meeting our emissions requirements. Massachusetts' 10 GW energy target for the Gulf of Maine should be combined with offshore wind needs for Maine, New Hampshire, and the larger New England grid. Maine has indicated a current planning target of 3 GW of offshore wind for the Gulf of Maine, and the New England Independent System Operator (ISO-NE) has indicated that 18+ GW from the Gulf of Maine may be needed to meet the renewable energy needs of all six New England states.[4] BOEM's planning process for commercial leasing for the Gulf of Maine should seek to designate Final WEA(s) with adequate area to support these anticipated energy needs.

Given the importance of Gulf of Maine offshore wind to Massachusetts and other New England states' renewable energy development needs, we strongly recommend that BOEM include sufficient area to account for at least 13 GW of capacity in the 2024 lease sale. The auctioning of adequate lease area to accommodate state needs will give the industry assurances to justify investments in site acquisition, project development, port construction, as well as supporting facilities, vessels, and services. BOEM should also designate, but not yet lease, additional Wind Energy Area to achieve the stated goals of ISO-NE and other industry representatives. These areas could be offered in later years to address the addition of potential new load demand and offer alternative areas should any of the leased areas not advance through required reviews. Once the Final WEA(s) are defined, BOEM should prioritize leasing the western areas in the Draft WEA to support the Commonwealth's renewable energy requirements.

---

[3] https://newenglandenergyvision.files.wordpress.com/2023/01/joint-state-innovation-partnership-for-offshore-wind-concept-paper.pdf

[4] BOEM virtual public meetings November 1-3, 2023

*Bidding credits*

Bidding credits are in important tool available to BOEM to incentivize investments in regional elements of the emerging industry. We strongly support the use of bidding credits for the Gulf of Maine lease sale utilizing approaches similar to those employed in the recent Pacific and the Gulf of Mexico auctions. Bidding credits should be offered to support the development of the domestic offshore wind supply chain and related local and regional economies, environmental research and mitigation as well as for fisheries compensatory mitigation. Awarding credits for environmental research and fisheries mitigation is consistent with the wildlife research support and fisheries mitigation plans that are required in the currently-open RFP for power purchase agreements in Massachusetts. We are interested in exploring with BOEM and others the potential for a bidding credit to incentivize investments and work towards shared offshore power grid or "backbone", cable route corridor(s), and other forms of transmission planning that will improve efficiencies and minimize the impact of cables and cable-laying on the seafloor.

*National Marine Fisheries Service surveys*

Historic National Marine Fisheries Service (NMFS) stock assessment survey stations should be protected to the extent possible. BOEM should follow NMFS's guidance on how to minimize both short-term disruptions to trawling activities and long-term alterations of trawl routes throughout the WEA identification and subsequent project development stages including turbine siting. NMFS trawl surveys are a valuable resource used for monitoring fisheries stock abundance, biology, and distribution, and for determining sustainable catch. The utility and applicability of this long-term dataset should be sustained, and BOEM should continue to work with NMFS to minimize disturbance to the NMFS trawl surveys. BOEM should encourage collaborative research and development programs between lease holders and NMFS and other institutions that aim to develop best practices to ensure monitoring data are shared and integrated into resource assessments, for example the cooperative research and development agreement between the Northeast Fisheries Science Center and Community Offshore Wind in the mid-Atlantic.

*Geological, geophysical, and biological bathymetric conditions (including bottom and shallow hazards).*

The seafloor in the Gulf of Maine is diverse, owing to large erosional and depositional events associated with glaciation and subsequent melting. The winnowing process behind the delineation of the Draft WEA has removed and avoided several named bathymetric features that are important habitats and support various fisheries (e.g., Georges Bank, Platts Bank, Three Dory Ridge, Parker Ridge). Through the WEA finalization and leasing process and the forthcoming development of construction and operation plans, environmental and other reviews, BOEM should work with lessees, the offshore fishing industry, and fisheries management agencies to identify additional bathymetric features where commercially important fisheries species (e.g., redfish) concentrate and where concentrated trawl lines indicate relatively high fishing effort. Similarly, BOEM should work with NOAA and academic organizations that map corals, sponges, and sea pens to identify and protect these important, sensitive habitats from disruption by anchors, scour protection, cable laying, and other disturbances.

*Archaeological and cultural resources on the seabed, effects to historic properties*

While the Draft WEA is located beyond state waters, renewable energy development in the Final WEA will require transmission cables, and it is likely that cables will interconnect in Massachusetts. Massachusetts waters have more than 3,500 reported shipwrecks, as well as submerged Indigenous sites, coastal infrastructure, and aircraft, and many of these archaeological resources are in the approaches to historically populated areas where candidate POIs are located. Locations of submerged ancient landforms inundated by sea level rise since the last glaciation remain largely unknown and as-yet unidentified in Massachusetts waters north of Cape Cod. Recent marine archaeological assessment surveys conducted in support of the permitting of offshore wind energy projects in the Southern New England wind leases indicate the potential for relict elements of archaeologically and culturally sensitive submerged ancient landforms to be preserved during future renewable energy development in the Gulf of Maine with landfalls in Massachusetts. BOEM should coordinate with Massachusetts and other states on cable routes to ensure that the offshore portion of the cable route considers sensitive cultural resources. Cable routes should approach state waters such that impacts to possible submerged ancient landforms and known archaeological resources can be avoided and minimized.

*Potentially conflicting use: Commercial fisheries*

The Gulf of Maine is an extremely productive fishing area, bringing in approximately $123 million in commercial fisheries revenue annually from the federal waters in BOEM's Gulf of Maine Planning Area alone. Of that total, approximately $46 million is landed by the multispecies groundfishing fleet, which is largely a Massachusetts-based fishery. The groundfish industry is an important part of the Massachusetts economy and contributes to the cultural identity of several Massachusetts ports including Gloucester, Boston, Scituate, Chatham, Provincetown, and New Bedford. Ports such as Gloucester and Scituate are supported by local, small-vessel owners that depend on near-shore year-round fishing access, particularly adjacent to the Western Gulf of Maine Closed Area and in the traditional winter fishing grounds in Wilkinson's Basin. Wind leasing in these areas could disproportionately impact small groundfish fleets that cannot move further offshore, and may adversely impact fleet diversity and revenue of Massachusetts ports. Fleet diversity promotes resilience and stability of fishing businesses by encouraging diversification and quota utilization, and will be critical to our fishing communities' ability to respond to productivity shifts associated with climate change and the resulting warming, Gulf Stream intrusions, and ocean acidification. BOEM should use a data-driven process that considers the economic viability of both the large and small-vessel groundfish fleets to maintain fleet diversity, Massachusetts fishing ports, and the yield of clean, fresh, sustainable seafood.

Stakeholder engagement and the winnowing process to date has resulted in a 4-fold size reduction from the Planning Area to the Draft WEA. This reduction has removed the areas with the highest fishing productivity from consideration for wind leasing, preserving the fishing grounds from which 86% of all Gulf of Maine fisheries revenue is generated and 78% of multispecies groundfish revenue. While fishing activity is relatively low in the Draft WEA compared to the rest of the Gulf of Maine, certain important groundfishing areas to the southwest and east of Cashes Ledge remain under consideration for wind development. While vessel trip report (VTR) data does a reasonable job at

representing the general spatial footprint of this fishery, as well as providing important metrics such as landings and revenue, the point nature of the reports prohibits it from adequately capturing the fine spatial scale of established long groundfish trawls. VMS more accurately reflects groundfishing industry use of the area, and therefore BOEM should consider both the location and the orientation of trawl lines apparent in the VMS data when delineating lease areas. As discussed above, BOEM should use VMS data to refine the Final WEA(s) and proposed lease areas at the aliquot level, to account for and avoid historically successful groundfish tow lines through Wilkinson Basin that run northwest to southeast. In addition, BOEM should designate leases within the WEA(s) such that transit routes connecting fishing ports to fishing grounds are preserved as open lanes between lease areas. Finally, BOEM should encourage lessees to use the floating turbine anchoring systems that have the smallest footprint in the water column, for example tension leg platform foundations, to minimize the area of impact.

In the Commonwealth's Call Area comment letter to BOEM dated June 12, 2023, we identified an area of high groundfish landings in the northern portion of Wilkinson Basin, and we requested that it be considered for exclusion from leasing. A large part of the previously-identified area has now been removed due to the exclusion of LMA1 in the designation of the Draft WEA and due to the low suitability model results for the area south of Cashes Ledge. However, a significant portion (232,215 acres) of the previously-identified area remains in the Draft WEA within parts of grid blocks 5A, 5B, 6A, and 6B, and this remaining portion is in the highest-revenue (top 10%) area of the Gulf of Maine (see attached map). Frequently-used trawl lines apparent in the VMS data described above confirm the location and shape of the previously-identified area and underscore the importance of the area. Given the importance of the area, and the likely incompatibility of this type of fishing with floating offshore wind, BOEM should defer leasing within the previously-identified area, in particular the areas where VTR revenue is in the top 10% quantile and/or with VMS annual mean polls higher than ~9 per $km^2$ (e.g., the top 2 quantiles), until more information on groundfishing coexistence with offshore wind can be gained and technological advancements that facilitate coexistence can be made.

*Potentially conflicting uses: Protected species*

Numerous federal and state listed threatened and endangered species are present in the Gulf of Maine. Areas of important habitat for these and other species have been considered while siting of Gulf of Maine WEAs. Restricted Areas, areas within 20 nm of shore or within 10 nm of Georges Bank, and other important habitat areas in the original RFI and subsequent Call Area have been excluded and are now outside the Draft WEA. These reductions will help minimize the impact to protected species including the North Atlantic Right Whale (NARW), as well as other marine mammals, birds, sea turtles, fish, invertebrates, and habitats. After leases are issued and as individual projects are developed, BOEM and relevant federal partners at NOAA, U.S. Fish and Wildlife Service (USFWS), and elsewhere will likely require mitigation and monitoring strategies in line with previous wind energy projects. Mitigation strategies to avoid and minimize harm to wildlife can include vessel speed restrictions, protected species observers, time of year restrictions, and adaptive turbine curtailment especially during migration, for example. BOEM and lessees should work with states and other local and regional organizations to develop appropriate minimization and mitigation strategies to offset impacts to protected species. Minimization and mitigation measures will be needed because

while many important habitat areas have been removed from the Draft WEA, some protected habitat and species, including NARW, will likely have a presence in any WEA that is sited in the Gulf of Maine.

Many important sea bird habitat areas have been excluded through the BOEM planning process including those areas closest to known bird habitats on Maine islands, and this will help minimize impact to protected bird species, and avifauna in general. Offshore wind still poses a unique risk to avifauna because collision risk is difficult to mitigate, and because data about birds is lacking. Bird and bat migration routes are not known for all species, and flight heights with respect to the rotor swept zone are unknown for many if not most species, including endangered roseate terns. Since these data on birds are lacking, it is difficult to make specific spatial recommendations that will avoid or minimize impact. BOEM should require commitments from lessees for off-site compensatory mitigation for avifauna impacts, in addition to available avoidance and minimization measures. The Massachusetts Office of Coastal Zone Management is developing guidance on wildlife mitigation best practices and strategies to prioritize, and BOEM and lessees should consult with Massachusetts and other states when planning mitigation strategies throughout the leasing and development process. BOEM should also require lessees to conduct or support research that will fill data gaps and thus facilitate better minimization and mitigation in the future. The Regional Wildlife Science Collaborative's recently developed Science Plan can provide guidance on efficiently filling those data gaps.

*Visual resources and aesthetics*

The Commonwealth recognizes the value of natural aesthetics, especially when considering the views from nature-oriented places like national parks. We therefore request if viewshed simulations are created, the views from in and around the Cape Cod National Seashore are analyzed. In particular, views should be simulated from locations with elevated vantage points such as the Pilgrim Monument tower in Provincetown and the Jenny Lind Tower in Truro, and also from coastal areas such as Marconi Beach in Wellfleet and the Salt Pond Visitor Center in Eastham (see attached map). Massachusetts is also home to many registered historic lighthouses, and the views from these buildings should be assessed through the required National Historic Preservation Act process.

*Constraints and advantages of possible electrical cable transmission routes and interconnection points*

Decisions about interconnection locations for offshore wind from the Gulf of Maine will be made during lease area development. However, there are existing points of interconnection on the New England grid that are likely to be advantageous for potential offshore wind interconnection due to their existing capacity and location near energy demand centers. In order to serve energy demand in Massachusetts, locations where energy generation facilities have or may soon be retired (e.g., in Plymouth, Everett, or Somerset) are desirable for potential offshore wind interconnection. Due to their location in the Boston area, which is the largest energy demand center in New England, interconnections in Everett or in Boston are also desirable. Gulf of Maine offshore wind interconnecting within the Boston subregion could be particularly advantageous given future load growth and constraints associated with importing power into Boston, as observed in the recent Draft

2050 Transmission Study from ISO New England.[5] Massachusetts is committed to working with its neighboring New England states on innovative transmission solutions to unlock regional offshore wind resources, as envisioning in the Joint State Innovation Partnership for Offshore Wind.[6]

The Commonwealth has heard from the fishing industry regarding the separation between the WEA leasing process and the identification of cable corridors to POIs. The Commonwealth supports an equally robust planning process to identify cable corridors through federal waters that will be useful to the offshore wind industry while also minimizing impacts to existing resources and uses. The planning process should include stakeholder engagement, should be coordinated with state-led cable route planning for state waters, and should occur as soon as possible. A spatial suitability modelling approach that mirrors the NCCOS model for WEA identification would be appropriate, and such a model should use data and a suitability weighing structure specific to the possible conflicts and concerns associated with cable corridors and bottom disturbance, which will in many cases be distinct from conflicts associated with surface occupancy and wind farm infrastructure. The Commonwealth and Stellwagen Bank National Marine Sanctuary (SBNMS) are working together on cable route planning for Massachusetts points of interconnection. BOEM should support this effort by recommending lessees coordinate with Massachusetts and/or SBNMS for Massachusetts POIs.

Identifying routes that will require a minimum amount of seafloor disturbance (including boulder relocation and cable protection installation due to insufficient burial depth) should be a top priority in the cable routing process. BOEM should require sufficient high-resolution geophysical surveys (including subbottom profiling) be completed during the initial site assessment phase to allow for effective avoidance and minimization of seafloor disturbance. BOEM should also encourage coordination in cable laying (e.g., make a corridor) among lessees to minimize the cumulative impacted area for this WEA. As discussed above, bidding credits are one mechanism to encourage coordinated cable planning.

**Importance of stakeholder engagement**

Commercial offshore wind leasing in the Gulf of Maine will continue to require engagement with stakeholders throughout all planning phases. The Gulf of Maine is a large and extensively used area, supporting unique and endangered wildlife, abundant fisheries, and diverse cultural and economic resources. As such, adding new uses such as offshore wind must include meaningful stakeholder engagement. The public meetings that BOEM has held throughout the RFI, Call Area, and now Draft WEA stages of the Gulf of Maine leasing process have allowed a diversity of stakeholders to voice support and concerns. BOEM should continue to include thoughtful and meaningful stakeholder engagement throughout leasing and permitting. As it moves toward offshore

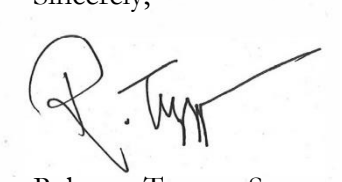
[5] https://www.iso-ne.com/static-assets/documents/100005/2023_11_01_pac_2050_transmission_study_draft.docx
[6] https://newenglandenergyvision.files.wordpress.com/2023/01/joint-state-innovation-partnership-for-offshore-wind-concept-paper.pdf

wind leasing in the Gulf of Maine, BOEM should continue to provide opportunities for input from stakeholder groups at key decision points. BOEM should strive for a transparent and collaborative leasing process, and to clearly communicate opportunities for stakeholder input.

The Commonwealth sincerely appreciates the ongoing collaborative efforts with the states of Maine and New Hampshire regarding our shared interests in planning for offshore wind in the Gulf of Maine and we look forward to continuing our joint efforts in supporting BOEM as the process moves forward. We also appreciate the joint efforts of the six New England states and federal agencies in developing a joint transmission development framework that will support the advancement of necessary clean energy, including offshore wind.

Thank you for the opportunity to provide comments on the Draft WEA in the Gulf of Maine. The Commonwealth appreciates BOEM for its expertise in siting energy on the outer continental shelf and working with the interested agencies and entities through the Gulf of Maine Task Force. My agencies and offices look forward to continuing to work with BOEM, key stakeholders like our commercial fishing industry, other federal agencies, and the states of Maine and New Hampshire as the planning process for siting offshore wind in the Gulf of Maine continues.

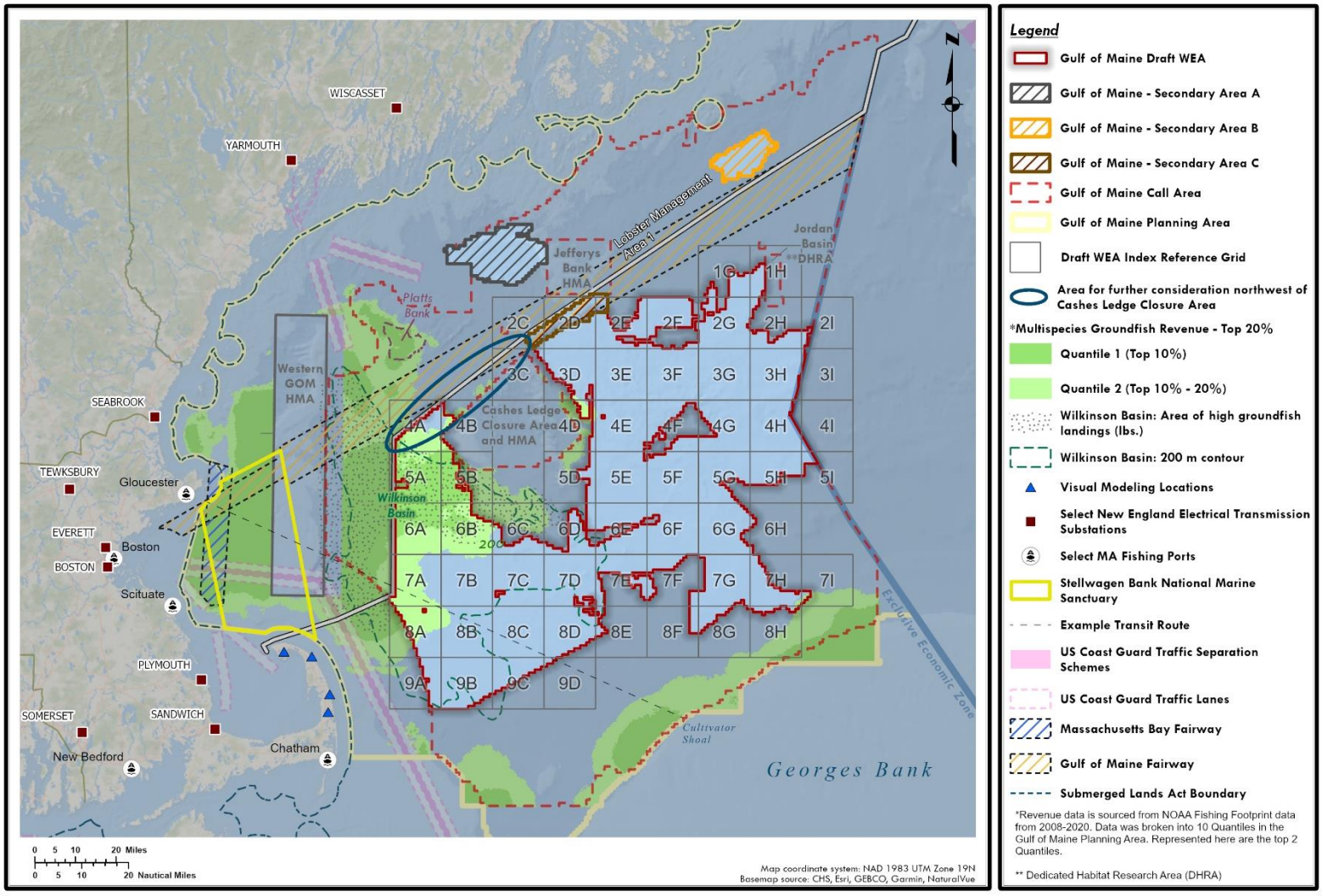
Sincerely,



Rebecca Tepper, Secretary EEA

Attachment: Gulf of Maine map

cc:
James Bennett, David MacDuffee, Luke Feinberg, Bureau of Ocean Energy Management
Ted Diers, NH Department of Environmental Services
Dan Burgess, Maine Governor's Energy Office




Massachusetts Office of Coastal Zone Management
Executive Office of Energy & Environmental Affairs

11/20/2023

**BOEM Gulf of Maine Draft Wind Energy Area**