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Karen Baker
Office of Renewable Energy Programs
Bureau of Ocean Energy Management
45600 Woodland Road
Sterling, VA 20166

RE: Docket No. BOEM–2024–0026: Atlantic Wind Lease Sale 11 (ATLW-11) for Commercial Leasing for Wind Power Development on the U.S. Gulf of Maine Outer Continental Shelf – Proposed Sale Notice

Dear Chief Baker,

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 above-referenced Proposed Sale Notice (PSN). These comments incorporate input received through conversations with stakeholders and with subject matter experts from my agencies and offices. We look forward to continued engagement with BOEM, stakeholders, our fellow Gulf of Maine States, and other federal agencies regarding this and future lease sales in the Gulf of Maine, and throughout the development of wind energy projects in Gulf of Maine leases.

The development of floating offshore wind in the Gulf of Maine is critical to ensure the

Commonwealth of Massachusetts achieves its carbon emission reduction targets. Massachusetts strongly supports the Biden-Harris Administration's goals to achieve 30 gigawatts (GW) of offshore wind by 2030 and 15 GW from floating offshore wind by 2035 while reducing costs of floating offshore wind. These national goals align with the Commonwealth's requirement of achieving net-zero carbon emissions by 2050, a target which is expected to require at least 23 GW of energy from offshore wind, including 10 GW or more from the Gulf of Maine. Meeting these state and national decarbonization milestones on time will enable us 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.

Siting offshore wind within the already-busy Gulf of Maine is a complex challenge that requires careful analysis of numerous factors and engagement with an array of stakeholders. Existing ocean habitats, resources, and uses in the Gulf of Maine, 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 for the Gulf of Maine has been robust and informed by best available data and significant stakeholder engagement. With spatial suitability models developed by the National Oceanic and Atmospheric Administration's (NOAA) National Centers for Coastal Ocean Science (NCCOS) and a transparent and iterative review process for applying and interpreting the model outputs, BOEM has taken into consideration the many marine uses and environmental concerns in the region. In siting the wind energy leases, and in developing this PSN, BOEM has responded to concerns raised by Massachusetts on behalf of its stakeholders, including comments in our previous letters of October 3, 2022, June 12, 2023, and November 20, 2023.

Bidding Credits

The Commonwealth generally supports the use of bidding credits in this lease sale to facilitate growth and stability of the offshore wind industry and to mitigate impacts to Gulf of Maine fisheries. As stated in our previous comments of November 20, 2023, in response to the release of the draft Wind Energy Area, we also recommend bidding credits for supporting environmental research for wildlife and habitats in the Gulf of Maine. Recognizing that BOEM will allocate at most 25% non-monetary factors in this lease sale, we request BOEM keep the existing Fisheries Compensatory Mitigation bid credit (with some adjustments as discussed below) at the same or similar percentage as it currently carries (12.5%), but split the remaining available percentage between the workforce/supply chain credit described in the PSN and a new credit for contributions to research on the impacts of offshore wind on Gulf of Maine wildlife and habitats. Awarding credit for financial contributions to research to better understand the potential impacts of offshore wind development on wildlife and habitats, including habitats that support commercial fisheries and critically endangered species, would be consistent with the power purchase agreement bid requirements in Massachusetts and other states. Funds derived from a bid credit for wildlife and habitat research and monitoring should be administered by the Regional Wildlife Science Collaborative for Offshore Wind.

Massachusetts is one of eleven states involved in the establishment of a regional fund that

would administer financial compensation for fisheries economic impacts resulting from offshore wind development off the Atlantic Coast. As such, we support the Bidding Credit for Fisheries Compensatory Mitigation for commercial and for-hire recreational fisheries that would be directed towards the regional fund. Also, we are encouraged that the proposed credit is higher in this PSN compared to previous lease sales in other regions. The Fisheries Compensatory Mitigation bid credit is especially critical in the Gulf of Maine given the value of the groundfish fishery in the area and the potential for exclusion of mobile gear from floating wind arrays. The fishing industry has indicated that demand for fisheries compensation in the Gulf of Maine over the course of these projects from planning, through construction, operations, and decommissioning will likely exceed the funds generated through a 12.5% bidding credit. However, the bid credit monies could be directed to near-term fisheries impacts related to those activities specifically authorized by this lease sale (such as site characterization surveys and site assessment), leaving the longer-term impacts from construction, operations, and decommissioning to be assessed and mitigated as part of BOEM's National Environmental Policy Act (NEPA) review of individual project COPs and/or state level reviews under the Coastal Zone Management Act. In addition to monies being put towards direct compensation, bid credit monies could be used to support coexistence between offshore wind and the fishing and seafood industries, for example through support of fisheries resource enhancement programs, innovation and research funds, or shoreside community funds.

For the Final Sale Notice, BOEM should consider adjustments to the implementation of the Fisheries Compensatory Mitigation credit and the Workforce Training credit so that they may better serve members of the fishing industry. In the southern New England lease areas off Massachusetts and Rhode Island to date, fisheries direct compensation is applicable and payable only to the owner of a fishing vessel that fished the area during the eligible baseline period defined by developers. If a permit is transferred between vessel owners, payments cease. BOEM should encourage developers through lease stipulations and Record of Decision conditions to allow fishing permit transfers among vessels to be included in direct compensation programs. Additionally, BOEM should consider making fisheries compensation available to vessels transiting through lease areas in addition to current compensation requirements listed in the PSN (page 35233) such as gear loss or damage and lost fishing access within the Gulf of Maine Lease Areas. As opposed to fixed foundation turbines in the southern New England WEAs, floating wind turbines will move within a watch circle when installed. This characteristic of floating arrays and the related safety concerns may exclude fishing vessels navigating through wind lease areas to a greater extent than for fixed foundation arrays. The Bidding Credit for Workforce Training should support opportunities for training within and around floating arrays, such as crew on scout vessels, for commercial fishing industry members to gain unique and transferable on-the-water skillsets.

Fisheries Compensatory Mitigation

While not the subject of this PSN, we recommend that BOEM review related policies that may need to be updated given this and other recent PSNs and renewable energy lease sales in areas where depths are expected to necessitate floating wind technology. Specifically, BOEM should update the "Guidelines for Mitigation Impacts to Commercial and Recreational Fisheries on the Outer Continental Shelf Pursuant to 30 CFR part 585" for wind lease areas to include the unique

characteristics and conditions of floating offshore wind technology, such as for the Gulf of Maine, particularly with respect to the payment structure during wind farm operation. The text currently written in the Operations section of the draft guidance for fisheries mitigation reads, "Generally, and as a minimum standard it should be assumed that there is an adjustment period for fisheries post construction. BOEM recommends that, at minimum, lessees consider the following payment structure be available for claimants: 100 percent of revenue exposure for the first year after construction, 80 percent of revenue exposure 2 years after construction, 70 percent of revenue exposure 3 years after construction, 60 percent after four years, and 50 percent after five years post construction. Compensatory mitigation beyond 5 years post-construction may be necessary and should be evaluated based on the activities proposed in the COP." However, the adjustment period for the commercial fisheries in the Gulf of Maine will likely differ significantly than that within fixed foundation arrays due to the floating technology, anchor types, spacing among turbines, and arrangement of moorings/cables in the water column that may preclude fishing operations. Therefore, we recommend that BOEM, in consultation with NOAA National Marine Fisheries Service (NMFS), increase both the duration of assumed operational impacts and percentage of revenue exposure per year post-construction in an updated draft guidance that accounts for floating wind technology. Pre- and post- construction monitoring of fishing activity within the lease areas should be gathered to inform the update to BOEM's Guidelines for Mitigation Impacts.

Potential impacts to commercial and for-hire fisheries, and the need for additional compensation, will vary between projects and according to their design, layout, and location. During its NEPA review, BOEM should consult with NMFS to determine the value of fisheries within each lease area and utilize their new socioeconomic tool[1] in wind lease areas to evaluate landings and revenue values according to lease areas, species type, gear type and port/state of landing. We recommend that BOEM consider enabling the fisheries communities to have more input on how fisheries compensation should be disbursed given some concern that monies used in previous compensation programs do not always address the fisheries (and fishing industry participants) most impacted by offshore wind development. Allowing the fishing industry to have more input regarding fisheries compensation could ameliorate impacts for those fisheries most impacted by offshore wind development and help inform the Eleven States Initiative.

Benthic Resource Protection

The Commonwealth supports a robust planning process to identify cable routes through federal waters that will be useful to the offshore wind industry while also minimizing impacts to existing resources and uses. The Massachusetts Office of Coastal Zone Management is working with the Stellwagen Bank National Marine Sanctuary (SBNMS) and NCCOS to identify potential cable routes through state waters and federal waters including those in SBNMS that minimize impacts to natural and cultural resources. BOEM should require lessees to consult with this group and consider using the routes identified through this effort before proposing cable routes in a Construction and Operations Plan (COP).

[1] https://www.fisheries.noaa.gov/resource/data/socioeconomic-impacts-atlantic-offshore-wind-development

The PSN includes an advisory that deep sea corals, sponges, and hardbottom habitat have been identified in the Gulf of Maine, and that these areas may be subject to protections during activities authorized by the lease or by any future COP. The Commonwealth supports restrictions that avoid and minimize impacts to deep-sea corals, sponges, and biologically sensitive benthic habitat. BOEM should include a restriction via lease stipulation on anchoring, sampling, or other bottom contact associated with survey vessels and other site characterization activities on or within a defined distance from hardbottom habitat, coral areas, fish spawning areas, and other sensitive areas as identified through consultation with NOAA or other relevant agencies. Given the paucity of data on the Gulf of Maine Seafloor, if anchoring, sampling, or otherwise making contact with the seabed will occur in areas without recent bathymetric or other surveys, those surveys should be conducted first to avoid impacts to protected habitats that have not yet been identified. The specific distance to keep from protected habitats during site assessment activities should be at least as great as that in similar stipulations on recent BOEM leases elsewhere. Likewise, any future COP approvals should include a requirement for a similar setback distance for construction-related anchoring and disturbance, especially any permanently installed anchor lines that may continuously disturb the seafloor such as catenary anchor lines on floating turbine platforms. When turbines and their foundations (whether floating or fixed) are installed, required setbacks from hard bottom and protected habitats should be considered during the micro-siting process and required by the COP terms and conditions.

Responses to BOEM Questions for Stakeholders

Number, Size, Orientation, and Location of the Proposed Lease Areas

The eight proposed lease areas include five that are partially or entirely located within 75 miles of shore. Since wind farm construction costs increase with distance, this arrangement will support the early phases of commercial scale floating offshore wind by reducing costs and barriers to entry as the industry becomes established. The eight lease areas are approximately equal in size and are arranged such that two are closest to possible grid interconnection points in Maine, and six are likely closer to interconnection points in Massachusetts. The geographical spread of the leases approximately aligns with the spread of expected demand for the energy they will produce, with Massachusetts requiring at least 10 GW of offshore wind power from the Gulf of Maine, and Maine requiring 3 GW.

The initial auction in the Gulf of Maine should include sufficient leased area to facilitate the development of at least 13 GW of offshore wind to support the combined offshore wind targets for Maine and Massachusetts, with additional area made available in subsequent auctions. The currently proposed eight leases will enable states to meet their requirements, and all should be offered for auction in 2024. While we expect and encourage BOEM to lease all eight areas, if for any reason the initial auction does not include them all, then those closest to shore (e.g., OCS-A 0562, OCS-A 0563, OCS-A 0564, OSC-A 0567, and/or OSC-A 0568) should be prioritized for this lease sale, with the rest included in a subsequent Gulf of Maine lease sale currently scheduled for 2028. With this PSN, BOEM has not offered all available area within the final WEA, with the expectation that some of the remaining area may be included in additional lease areas not yet

delineated as part of that future lease sale. Leasing in phases in this way will allow for needed collection and analysis of data on fisheries and habitat impacts from floating offshore wind development to occur in this first set of leases; this additional data may inform future refinements to lease areas, the overall WEA, or project designs for areas leased in 2028 or beyond.

The proposed lease areas avoid Rodgers Swell and Mayo Swell. These areas should not be leased now or in future auctions. We encourage BOEM to continue to engage stakeholders to ensure that all such seabed features important to fisherman are avoided in any other leasing within the current Wind Energy Area (WEA) or elsewhere within the Gulf of Maine. If BOEM eliminates or reduces the size of any lease areas or of the final WEA, we recommend that development be excluded from the top 3 quantiles of the Vessel Monitoring System (VMS) groundfish activity provided through the Northeast Seafood Coalition, especially near or at important fishing features including Rodgers Swell and Davis Swell. BOEM should also consider a 1.5-2 nautical mile (nm) setback along the eastern edge of Lease Area OCS-A 0564 with no subsurface or surface offshore wind infrastructure in that area due to the infrequent trips but high-volume landings of groundfish species (e.g., Acadian Redfish) there. The gaps between leases and the restrictions on development within the leases that together create transit corridors should also be retained in this and any future leases sales in the area.

The proposed lease stipulation "Surface Structure Layout and Orientation" in Addendum C would require lessees of lease areas that abut without a transit corridor gap to design a structure layout with two common lines of orientation across the adjacent leases, and if the lessees cannot agree on the same layout, each must have a 1 nm setback from the lease boundary. We recommend that BOEM clarify the definition of common orientation and layout given that offshore wind infrastructure may differ between abutting lease areas. BOEM should consider factors that may subtly change the layout of turbine foundations between abutting leases, such as foundation types, watch circle radii, mooring types and designs, and anchor types, that could change the effective spacing and therefore impact user navigability and operations. We agree that if lessees do not adhere to the same orientation and layout of wind turbine generators as part of the "good neighbor" stipulation, that a setback should be in place as a lease stipulation. To keep the spacing consistent with other transit corridors in the PSN (2.5 nm), we recommend the setback be modified from 1 nm to 1.25 nm if the same orientation among neighboring lease areas is not adopted.

Considerations for delineation of the proposed Lease Areas

As discussed above, the delineation of these lease areas will facilitate interconnections with both Massachusetts and Maine, and their orientation and distance from shore will allow multiple wind projects to potentially use alternating current (AC) rather than direct current (DC) high voltage (HV) transmission cables. HVAC will likely be preferred for the initial floating wind installations due to relative costs and the status of currently available technology. BOEM should continue to engage stakeholders in the offshore wind industry and supply chain to determine optimal delineations and orientations for maximizing energy production given the prevailing winds, meteorological conditions, ocean depths, and other characteristics of the Gulf of Maine.

Existing uses and how they may be affected by the development of the proposed Lease Areas

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 WEA and proposed lease areas, and BOEM has adopted many stakeholder and expert recommendations through this process. After leasing, 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 that may occur as a result of surveys, construction, and operations. Minimization and mitigation measures will be needed because while many important habitat areas have been removed from consideration for leasing in this proposed sale, some protected habitat and species, including the North Atlantic Right Whale, will likely have a presence in any energy lease that is sited in the Gulf of Maine. In addition, offshore wind poses a unique risk to avifauna because collision risk is difficult to mitigate, and because data on key bird parameters such as flight heights and migration paths are lacking and thus could not be included in the spatial suitability model. BOEM should encourage lessees to conduct or support research that will fill these data gaps and facilitate better minimization and mitigation in the future. In addition to the proposed lease stipulation for baseline monitoring, BOEM should also incentivize other types of habitat and wildlife research (i.e., going beyond required monitoring to fill data gaps) with the new bidding credit discussed above.

In a June 12, 2023, letter to BOEM, the Commonwealth identified an area of importance to the Multispecies Groundfish fishery in the northern portion of Wilkinson Basin and requested exclusion of this area from consideration for leasing. In a subsequent November 20, 2023 letter, the Commonwealth requested deferral of leasing for all areas in the top 10% of revenue for Multispecies Groundfish in the Planning Area (according to Vessel Trip Reports, years 2008-2020) and/or in the top 2 quantiles of fishing activity of that fishery within the Call Area (according to VMS in years 2009-2021 at 1 km^2 resolution, speed filtered to 4 knots or less) until more information on coexistence could be gained and technology developed. The delineation of the final WEA and subsequent designation of lease areas was responsive to our concerns about potential effects on the Massachusetts groundfish fleet. Just 3% of fishing revenue for all target species, and approximately 5% of revenue from the Multispecies Groundfish fishery specifically, generated in the original Gulf of Maine planning area are from the proposed lease areas.

While approximately 95% of the groundfish revenue in the Gulf of Maine has been avoided in the proposed lease areas, we recommend that BOEM conduct a portside analysis on the groundfish fishery, particularly of day-boats and vessel owners with few vessels in the South Region leases. Many small vessel owners actively fish closer to shore and leasing in these lease areas could disproportionally exclude operations of local fleets in the Gulf of Maine if they are not able to fish safely within the floating arrays. BOEM should consider economic viability of both small and large groundfish vessels to maintain fleet diversity and should identify which port economies will be most at risk for potential shoreside economic losses from various floating offshore wind designs and layouts. Over half of the Massachusetts small ports (i.e., excluding Boston, Gloucester, and New Bedford) had at least 50% of their respective groundfish vessels fishing within the current proposed lease sales based on Vessel Monitoring System (VMS) data

from 2008-2022. In addition, 32% of all vessels that land fish in the largest Massachusetts groundfish landing ports (Boston, Scituate, Chatham, Gloucester, and New Bedford) have fished and/or transited within the proposed lease areas based on groundfish VMS data from 2018-2022. Based on the Framework 66 report from the New England Fishery Management Council Northeast Multispecies Fishery Management Plan,[2] this could equate to impacting average annual Massachusetts groundfish revenues of $23,780,000 over the same period (2018-2022) from the ports of Boston, Scituate, Chatham, New Bedford, and Gloucester. However, we caution this estimated monetary value does not include an exact amount of groundfish landed from the proposed lease areas because it includes vessels that at least fished once within the proposed lease areas while also fishing outside of the lease areas from 2018 to 2022.

Baseline Monitoring

As described in the PSN, BOEM is considering a lease stipulation that "would require lessees to conduct baseline data collection activities for endangered and threatened marine mammals and their habitats in support of their construction and operations plans." Massachusetts strongly supports a lease stipulation to require baseline data collection on potentially impacted wildlife and habitats. BOEM should expand the proposed stipulation beyond marine mammals to require baseline data collection for other vulnerable species including endangered and threatened birds. Data collection on state- as well as federally-listed threatened and endangered species, and also species of concern, should be covered by this stipulation. All wildlife and habitat data should be shared following best practices including the guidance of the Regional Wildlife Science Collaborative (RWSC). As a part of any lease stipulation to collect baseline data, BOEM should require developers to coordinate (e.g., via RWSC) to ensure compatibility of that data between lease areas to facilitate a regional understanding of the Gulf of Maine. While this stipulation only covers baseline monitoring, such monitoring programs must be designed with long-term monitoring through the life of the project in mind, since additional monitoring is likely to be required by permits and consultations associated with COP approval. Therefore, baseline data collection that will continue should be collected in a way that will be compatible with the methods that will be available during construction and operations.

Wildlife surveys should be multi-year and multi-season to account for inter- and intra-annual variability. For mammals, surveys should include aerial surveys (via aircraft or drone with a proven technology), as well as Passive Acoustic Monitoring (PAM) to inform a baseline understanding of marine mammal usage of the Gulf of Maine. Oceanographic surveys of prey distribution and abundance should also be monitored during all phases of wind energy development in lease areas and proposed cable corridors to determine how marine mammals may change their distributions and migratory pathways from wind energy infrastructure. Aircraft survey design should mirror that from documents related to the Southern New England wind energy area Megafauna Surveys. Continuous archival PAM and acoustic telemetry monitoring should be conducted in the proposed lease areas to collect baseline information on the presence, distribution,

[2] NEFMC, 2024. Northeast Multispecies Fishery Management Plan Framework Adjustment 66. https://www.nefmc.org/library/northeast-multispecies-groundfish-framework-66

and seasonality of North Atlantic right whales and other marine Megafauna. Archival and real-time PAM should be used to collect baseline information on the presence, distribution, and seasonality of marine mammals, endangered species, and especially along anticipated transit routes. Archival PAM should also be used to establish baseline noise levels in the proposed lease areas and surrounding waters.

Baseline habitat data collection should include studies of key prey species (plankton, etc.) of threatened and endangered species, meteorological/oceanographic monitoring, and surveys for hard bottom areas, coral areas, and other key habitats. BOEM should require sufficient high-resolution geophysical surveys (including sub-bottom profiling) be completed during the initial site assessment phase to allow for effective avoidance and minimization of seafloor disturbance through informed siting of infrastructure including export cables outside of the lease areas. The existing bathymetry within the leases is over 60 years old and other data necessary for mapping seafloor habitats is nonexistent. Therefore, BOEM should work with other federal agencies, state partners, and eNGOs to fund the data collection necessary to provide baseline data within the lease areas.

Environmental DNA (eDNA) monitoring is recommended to detect presence of species in the marine environment because it is a non-invasive sampling technique that can be used at fine temporal and spatial scales and can be used to detect a multitude of wildlife and fish species from one water sample. eDNA is already being used to detect mammals, fish, invertebrates, and birds in the southern New England wind energy areas and the required technology and methodology (e.g., appropriately specific PCR primers) are available for many marine species. Given that floating offshore wind will likely preclude conventional survey tools such as bottom trawling from operating within lease areas, eDNA could provide a feasible alternative method for information on species presence for a variety of different species, including those that are otherwise difficult to detect, and should be initiated in the baseline period before structures are built. Sampling for eDNA should occur on a seasonal basis and across the water column (surface, midwater, bottom) to capture the presence/absence of pelagic and demersal species.

In addition to these baseline wildlife surveys, BOEM should encourage lessees to conduct or support research into key uncertainties associated with floating offshore wind impacts on fisheries, habitat, and wildlife. For example, floating offshore wind has a greater potential of exposing pelagic species to electromagnetic fields (EMF) vertically in the water column given that dynamic cabling will likely be used and will not be sheathed in steel foundations like in fixed arrays.[3] BOEM should require developers to estimate EMF impacts associated with their design when they submit their COP, and then measure EMF and monitor its effects on EMF-sensitive species throughout construction and operations. Monitoring should include studies on EMF impacts to behaviors and movements through methods such as acoustic telemetry. BOEM should also identify pelagic species that may be EMF sensitive in floating offshore wind arrays.

[3] Hutchison, Z.L., Secor, D.H. and Gill, A.B., 2020. The interaction between resource species and electromagnetic fields associated with electricity production by offshore wind farms. Oceanography, 33(4), pp.96-107.

A second key uncertainty for floating wind is the interactions of threatened and endangered species with floating wind infrastructure including the risk of secondary entanglement. BOEM should consider requiring subsea camera monitoring beneath floating wind turbine foundations and routine video monitoring along the mooring lines as a lease stipulation or as a condition of COP approval. Video monitoring could be used to examine species presence/absence and behavioral interactions of endangered/threatened species with floating wind infrastructure. Routine video monitoring and side scan sonar (i.e., seasonally) along the mooring and inter-array cables is also recommended to examine the frequency of snagged fishing gear. If left unchecked, snagged and derelict fishing gear in floating wind arrays could increase the risk of secondary entanglements to North Atlantic Right Whales and other marine mammal and fish species.

Corridors between Leases

The arrangement of the leases as proposed, combined with the undevelopable areas within lease block aliquots, creates 2.5 nm transit corridors between leases that facilitate transit by fisherman and other mariners. The transit corridors, including the gaps between leases plus the undevelopable areas within lease block aliquots, facilitate transit by fishing vessels and other mariners. BOEM has been responsive to requests to create these corridors. The 2.5 nm transit corridors mimic those established in the New York Bight lease areas and represent a strong starting point. As the Gulf of Maine lease areas are planned for development, additional data and maritime engagement will inform the final wind turbine array spacing and orientation including the final transit corridor widths.

To aid mariner navigation and safety between lease areas in transit corridors, BOEM should require that developers install AIS transponders and cell phone towers on peripheral turbines and/or buoys that demarcate lease boundaries. Navigation remains a major concern for mariners and BOEM should encourage all developers to maximize navigational aides to mariners and fishers to bolster safety on the water with offshore wind infrastructure. Cell phone towers can also enable real-time relay of data on real-time PAM networks.

Limits on the Number of Lease Areas per Bidder

BOEM is proposing to allow each bidder in the auction to bid for at most two of the eight leases. BOEM has also proposed two schemes to disperse each bidder's allotment of two geographically: in the first, bidders would be limited to two leases overall, with at most one of the two leases in the "North" part of the WEA. In the alternative scheme, bidders would still be limited to two leases overall, with at most one in each of three areas: "North", "East" and "South". The intended effect of the overall limit, and the geographic region limits, is to ensure states will have a competitive response to power purchase agreement solicitations by preventing any one company from having a controlling number of leases in an area. The Commonwealth agrees there is the benefit to ratepayers, the region, and the public created by fostering competition among bidders in state renewable energy procurements. We therefore support the limit of two lease areas per bidder in this lease auction. We also support the original lease area scheme with the "North" and "South" regions.

Thank you for the opportunity to provide comments on the PSN for the first renewable energy auction 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