James Bennett
Program Manager
Office of Renewable Energy
Bureau of Ocean Energy Management
45600 Woodland Road
VAM-OREP
Sterling, Virginia 20166

Re: BOEM–2020–0005 - Vineyard Wind 1 COP Supplement to the Draft EIS

Dear Mr. Bennett:

We write to you on behalf of the members of the Business Network for Offshore Wind and to provide comments on the Vineyard Wind 1 COP Supplement to the Draft Environmental Impact Statement (BOEM 2020–0005) published in the June 12, 2020 Federal Register.

The Business Network for Offshore Wind strongly encourages the Bureau of Ocean Energy Management to reject Alternative F and *adopt Alternative D2*. By approving the full configuration of the Vineyard Wind project in adherence to the One Federal Decision Permitting Timeline, the Department of the Interior will send a clear message to the OSW market and investors that the U.S. is open for business and intends to be a central player in a global energy industry that will expand to $1 trillion by 2040.

The Business Network for Offshore Wind (the "Network") is a 501(c)(3) nonprofit organization that is exclusively focused on the development of the U.S. offshore wind ("OSW") industry and its supply chain. Since 2012, the Network has brought together business and government, both domestically and internationally, to educate and enable American businesses of all sizes to enter the OSW market. The Network uses the voice of its diverse membership, comprised of the full spectrum of the OSW supply chain, to educate and support federal, state, and local policies to advance the development of the U.S. OSW industry.

The Network and its members strongly support Vineyard Wind's proposal and its commitment to installing the project's turbines in a grid layout with 1 nautical mile ("NM") spacing between turbines in the east-to-west direction, and 1 NM between turbines in the north-to-south direction.

I. Introduction

The Network supports the diligent effort that BOEM has undertaken in preparing the Supplement to the Draft Environmental Impact Statement ("SEIS"). The cumulative impact analysis of Vineyard Wind's Draft EIS considered 926 megawatts ("MWs") of OSW buildout. By contrast, the SEIS considers development of approximately 22 gigawatts ("GWs") of Atlantic OSW capacity as reasonably foreseeable. This reflects the significant escalation in demand for U.S. OSW observed between 2018 and the present. Vineyard Wind will be the first utility-scale OSW project in U.S. waters, and the Network supports BOEM's deliberate consideration and commitment to environmental protection as it approves this vanguard offshore energy installation.

II. OSW has Proven Resilient in the Face of COVID-19, Presents an Unmatched Opportunity for Economic Recovery, and Approval of the Vineyard Wind Project is Directly Congruent with a June 4, 2020 Executive Order.

Before delving into the substance of the SEIS, the Network would like to highlight the unflagging resilience demonstrated by the OSW industry despite the ongoing COVID-19 pandemic. Globally, the first half of 2020 saw a record **$35 billion in OSW final investment decisions**, more than offsetting investment declines observed in global investment in solar, onshore wind, and biomass projects during the same period. U.S. OSW has similarly persevered in the face of COVID. The 12-MW Coastal Virginia Offshore Wind ("CVOW") project, off of Virginia Beach, was constructed during late May and early June. CVOW's turbines are now mechanically complete and commissioning is expected soon. In fact, the final steps of CVOW's construction will be aided by a U.S.-built OSW crew transfer vessel ("CTV") **launched in mid-July**.

It is clear that, globally and in the United States, OSW is an energy technology that is eminently capable of shrugging off the challenges imposed by COVID. This solidifies OSW's role as an infrastructure sector that is well-positioned to kickstart America's economic recovery. As a result, approving the Vineyard Wind project is consistent with the spirit of a recently issued Executive Order.

On June 4, 2020, the White House issued an **Executive Order** on Accelerating the Nation's Economic Recovery from the COVID-19 Emergency by Expediting Infrastructure Investments and Other Activities. The EO notes that "regulations and bureaucratic practices have hindered American infrastructure investments, kept America's building trades workers from working, and prevented our citizens from developing and enjoying the benefits of world-class infrastructure."

The Network could not agree more: **responsibly developed U.S. OSW projects are world-class infrastructure projects**, and they will serve as unparalleled engines of both immediate-term economic recovery and longer-term sustainable economic development. The Department of the Interior's approval of Vineyard Wind's Construction and Operations Plan (COP) will unleash a wave of private sector investment. More importantly, this approval will begin a domino effect that will ultimately put **tens of thousands** of hard-working Americans from across the economic spectrum and from all walks of life – including the building trades, vessel captains and deckhands, accountants, dockworkers, economists, welders, divers, aircraft pilots, atmospheric and marine scientists, truck drivers, attorneys, crane operators, project managers, mechanics, and every imaginable engineering discipline, among many other occupations – back to work. Vineyard Wind will also significantly contribute to energy security and improve local air quality in New England.

June 4, 2020 EO - Section 1

Section 1 ("Purpose") of the June 4, 2020 EO makes clear that "[u]nnecessary regulatory delays will deny our citizens opportunities for jobs and economic security, keeping millions of Americans out of work and hindering our economic recovery from the [COVID-19] national emergency." **This is precisely why the Vineyard Wind project must be approved in accordance with Vineyard Wind's One Federal Decision Permitting Timeline** (published February 7,

2020). Adherence to this established permitting timeline will enhance regulatory certainty and increase investor confidence in the U.S. OSW industry.

June 4, 2020 EO - Section 5

Furthermore, Section 5(b) of the EO specifically directs the Secretary of the Interior to use **all authorities** (emergency and otherwise) to "expedite work on, and completion of, all authorized and appropriated infrastructure, energy, environmental, and natural resources projects on Federal lands that are within the authority of each of the Secretaries to perform or to advance." Vineyard Wind specifically qualifies under this provision of the EO, because, pursuant to the **Outer Continental Shelf Lands Act**, all submerged lands lying seaward of state coastal waters (i.e. the land lying between 3 NMs offshore and the exclusive economic zone boundary 200 NMs offshore) are considered Federal lands. Furthermore, this analysis applies to all 22 GWs of proposed Atlantic OSW capacity contemplated under the cumulative impacts analysis of the SEIS. This is because the OSW lease areas from which the 22 GWs will be derived lie upon federally regulated portions of the Outer Continental Shelf. The only two exceptions are the currently operating Block Island Wind Farm and the planned Maine Aqua Ventus project, both of which are located in state coastal waters.

The Network recommends that, consistent with the text and spirit of the June 4, 2020 EO, the Secretary of the Interior **should utilize all authorities to advance and complete the Vineyard Wind federal permitting process in strict compliance with the One Federal Decision Permitting Timeline published February 7, 2020**. Careful adherence to the February 7, 2020 One Federal Decision permitting timeline is of the highest importance. The approval of Vineyard Wind's 1x1 NM configuration, which is a reasonable compromise solution, will send a clear message that the U.S. is open for business.

By contrast, the failure to issue a Record of Decision ("ROD") on December 18, 2020 approving Vineyard Wind – or, alternatively, issuing a ROD that requires a dramatic reconfiguration of the Vineyard Wind facility at this late stage – would represent a monumental lost opportunity for robust creation of American jobs. **In terms of market signals, the approval of a severely reconfigured Vineyard Wind project – i.e. requiring a 2 NM or 4 NM wide transit lane – would be tantamount to no approval at all.** This will have drastic broader negative economic ramifications and would serve to further deepen the staggering COVID-19-related recession that is now being experienced by Americans across the width and breadth of the United States. Such a decision would hamper American economic recovery and would exacerbate the exact regulatory uncertainty and unnecessary delays that the June 4, 2020 EO seeks to eliminate.

Moreover, this action would have a direct negative impact on investor confidence in the U.S. OSW market. The SEIS considers approximately 22 GWs of U.S. Atlantic OSW capacity to be reasonably foreseeable. Such a pipeline of projects would generally be considered sufficient to trigger large manufacturing investments, and clear market signals that the U.S. OSW pipeline is advancing will lead to building of American vessels of all types.

However, it cannot be overlooked that OSW is now a global market. The U.S. OSW market does not operate in a vacuum. Given that European and Asian OSW markets continue to surge,

sophisticated multinational Tier 1 suppliers may elect to focus their attention on those markets, rather than the U.S. OSW market. **The failure to issue a ROD approving Vineyard Wind may well lead investors to conclude that it is unlikely that U.S. OSW projects can complete the permitting process.** Seeing this continuing uncertainty, Tier 1 suppliers will elect to continue making manufacturing investments in more certain markets such as Europe, or to expand Asian manufacturing investments, rather than investing in U.S. OSW manufacturing facilities. **By approving Vineyard Wind, the Department of the Interior can send a clear message to the international OSW market and investors that the U.S. is open for business.**

June 4, 2020 EO - Section 6

Finally, Section 6 of the June 4, 2020 EO concerns the National Environmental Policy Act ("NEPA"), which governs the federal permitting process for Vineyard Wind, including the subject SEIS. This Section of the EO notes that the Council on Environmental Quality ("CEQ") has provided federal agencies with flexibility and alternative arrangements for complying with NEPA in emergency situations, like the COVID-19 pandemic and the associated economic recession. CEQ "has appropriately provided alternative arrangements in a wide variety of pressing emergency situations[,] including threats to energy security . . . and employment and employment and economic prosperity."

The Network, and the U.S. OSW industry as whole, strongly encourage the Department of the Interior to work with CEQ to ensure that the **Vineyard Wind federal permitting process strictly complies with the One Federal Decision Permitting Timeline published on February 7, 2020**. This approval will be a critical step in enabling Vineyard Wind to deliver the benefits that it can provide in terms of triggering investment and putting Americans back to work.

III. Uncertainty and Risk Associated with Broad Cumulative Impacts Analysis

Process Uncertainty

The SEIS covers virtually the entire U.S. East Coast, and appears intended to serve as a template for the evaluation of potential impacts associated with future OSW projects. While it may be appropriate for BOEM to acknowledge the existence of future OSW projects, the Network and its members caution against according the same weight to the potential impacts of those projects relative to OSW projects undergoing active federal review. Potential projects, though real, remain unformed, and it is reasonable to infer that those potential projects will adjust to lessons learned from the construction of the first utility-scale OSW projects in U.S. waters. Future OSW projects are likely to use turbines with larger nameplate capacities than those considered in the SEIS, which reducing impacts by decreasing the number of offshore structures. Additionally, there may be adaptive management measures gleaned from the monitoring of constructed OSW projects that could enable reduce their long-term impacts. In these ways, near-term OSW development is anticipated to evolve to support a lower incremental impact when compared to the Proposed Activity.

The Network is in no way recommending that the cumulative impacts study be re-performed, in fact we adamantly urge against that. We are just identifying the risks and uncertainties associated with an analysis of this scope and breadth.

Agency Bandwidth Risk

Regarding the prospective template that the SEIS may provide for future evaluation, the Network recognizes that the vast geographic extent of the cumulative analysis presents a substantial workload for federal agencies, developers, and stakeholders in developing and reviewing large volumes of material. This undertaking is above and beyond the substantial diligence already inherent in BOEM's standard OSW permitting and approvals processes. This added workload could strain existing resources and adversely impact OSW project federal permitting timelines, while providing only a marginal improvement in the identification of potential impacts as compared to those standard processes.

This concern is particularly relevant in view of BOEM's current staffing and budgetary constraints. Moreover, imposing additional workload upon BOEM would likely inhibit the agency's ability to auction new OSW lease areas. This includes the leasing of the draft New York Bight Wind Energy Areas, which, as acknowledged by the SEIS, will be necessary for both New York and New Jersey to realize their legislatively mandated OSW targets. Based upon the projections presented by BOEM at its November 2018 Intergovernmental Renewable Energy Task Force Meeting on the New York Bight,[1] which cited the announcement of "Final" Wind Energy Areas in 2019 followed by a Lease Sale in "Early 2020", this process is already significantly delayed.

IV. Alternative F, which includes a 4 NM transit lane, is Unnecessary and has Significant Negative Impacts

BOEM should reject Alternative F and *adopt Alternative D2* in the Final EIS.

Climate Change is an Existential Threat to Fisheries in Southern New England and Beyond

The SEIS states in Table 3.2-1: "In submerged habitats, warming is altering ecological relationships and the distributions of ecosystem engineer species, likely causing permanent changes of unknown intensity gradually over the next 3 years." On page 3-98, however, the SEIS reads: "Commercial fisheries and for-hire recreational fishing ***may*** be affected by climate change" [emphasis added]. These statements are somewhat contradictory. It is the Network's position that it is beyond question that climate change ***will*** have impacts on fishing. This conclusion is supported by the following:

- Food and Agriculture Organization (FAO) of the United Nations, Technical Paper 672, **Impacts of climate change on fisheries and aquaculture**, 2018 (the "FAO study"), states on page 1: "Aquatic

[1] BOEM. November 28, 2018. Intergovernmental Renewable Energy Task Force Meeting On The New York Bight. https://www.boem.gov/renewable-energy/state-activities/intergovernmental-renewable-energy-task-force-meeting-new-york-0

systems that sustain fisheries and aquaculture are undergoing significant changes as a result of global warming and projections indicate that these changes will be accentuated in the future."

- On page 95, the FAO study goes on to examine historical trends within US waters in the Northwest Atlantic from 1968 to 2007. "There were clear poleward shifts consistent with warming in many fish stocks." This statement clearly shows the historical impacts of climate change in an area that includes the areas under study in the SEIS.
- The FAO study continues with regard to the Atlantic coast, "…projected warming until 2060 is expected to modify the habitats in terms of suitable water temperatures of…85 percent of [the fishery target species] in the United States of America" (pg. 95). This statement shows the FAO's projected future impacts of climate change.

The National Oceanic and Atmospheric Administration ("NOAA") issued Technical Memorandum NMFS-F/SPO-89, **Climate Impacts on U.S. Living Marine Resources: National Marine Fisheries Service Concerns, Activities and Needs**, in August of 2008 (the "NOAA study").

Page 2 of the introduction section of the NOAA study states: "Depending upon the duration and magnitude of the climate change, species may persevere through periods of adverse conditions, temporarily shift their distributions or behaviors, or modify their ranges, behaviors and movements over the long term. **At the extreme, species may be extirpated from whole regions and potentially become extinct**" [emphasis added]. The position expressed in the NOAA study is certainly consistent with FAO's conclusions, and is also consistent with Table 3.2-1 of the SEIS. NOAA is clear that species extinction is the extreme case, but nonetheless it is possible, due to climate change.

The NOAA study covered the key climatic changes that impact marine ecosystems, including temperature change, increased ocean acidification, and loss of sea ice. The latter concern introduces less saline water from the Arctic and can drive salinity patterns and distribution as far south as Georges Bank and beyond (page 5).[2] Each of these elements are expected to contribute to shifting behaviors, distributions, and/or ranges of key species as well as potential extinction.

At this point, there is no consensus on what the precise effects of climate change will be on fisheries along the U.S. Atlantic coast and southern New England in particular. However, the United States, and the planet more broadly, are already entering uncharted territory in terms of climatic changes. Siberia has spent all of 2020 in a prolonged heat wave; during June, temperatures exceeded 38°C/100°F, which is the **highest temperature ever recorded north of the Arctic Circle**.

[2] For more information about the impacts of increased levels of freshwater associated with melting polar ice caps, see the National Oceanography Centre's TERIFIC project at https://projects.noc.ac.uk/terific/funding.

It is clear that climate change poses a very real threat and ***will*** have an impact on commercial fisheries and for-hire recreational fishing along the U.S. Atlantic coast and southern New England.

22 GWs of Offshore Wind in the U.S. Will Have a Significant Impact

The SEIS states on page 3-98: "Overall, it is anticipated that there will be no impact on climate change as a result of offshore wind projects alone, though they may beneficially contribute to a broader combination of actions to reduce future impacts from climate change."

The SEIS considers approximately 22 GWs of U.S. Atlantic OSW capacity to be reasonably foreseeable. These OSW GWs will be injected into the onshore electricity systems operated by ISO New England, NYISO, and PJM. Based on the annual CO_2 emissions and net generation for these three grid operators, the interconnection of 22 GWs of OSW would result in an estimated 8% reduction in carbon emissions in those regions[3]. On a planetary scale, the total emissions reductions from these projects might be considered small, but the reduction is quite significant in terms of decarbonizing the electricity supply of the Eastern Seaboard. Relative to other renewable energy technologies, OSW is a cost-effective and viable means of delivering large quantities of clean electricity to coastal load centers. **Approving the Vineyard Wind project sends the right signal: that America is open for business and ready to take a leadership role in this global clean energy industry.**

Transit Lanes are Unnecessary with a Uniform 1x1 NM Spacing

The United States Coast Guard ("USCG"), in the Final Report on **The Areas Offshore of Massachusetts and Rhode Island Port Access Route Study**, Docket Number USCG-2019-0131, dated May 14, 2020 ("MARIPARS"), gave the following Final Recommendation:

> **That the MA/RI WEA's turbine layout be developed along a standard and uniform grid pattern with at least three lines of orientation and standard spacing to accommodate vessel transits, traditional fishing operations, and search and rescue (SAR) operations, throughout the MA/RI WEA. The adoption of a standard and uniform grid pattern through BOEM's approval process will likely eliminate the need for the USCG to pursue formal or informal routing measures within the MA/RI WEA at this time.**
>
> - Lanes for vessel transit should be oriented in a northwest to southeast direction, 0.6 NM to 0.8 NM wide. This width will allow vessels the ability to maneuver in accordance with the COLREGS while transiting through the MA/RI WEA.
> - Lanes for commercial fishing vessels actively engaged in fishing should be oriented in an east to west direction, 1 NM wide.

[3] Based on data from EPA's Emissions & Generation Resource Integrated Database (eGRID) 2018 data file accessed July 20, 2020 at https://www.epa.gov/energy/emissions-generation-resource-integrated-database-egrid

- Lanes for USCG SAR operations should be oriented in a north to south and east to west direction, 1 NM wide. This will ensure two lines of orientation for USCG helicopters to conduct SAR operations.

  In the event that subsequent MA/RI WEA project proposals diverge from a standard and uniform grid pattern approved in previous projects, the USCG will revisit the need for informal and formal measures to preserve safe, efficient navigation and SAR operations.

Final MARIPARS at p. 38 [emphasis in the original].

The SEIS describes the proposed turbine layout in Section 2.2.2 and again on Page A-9. The SEIS document states on page 2-5: "The five Rhode Island and Massachusetts offshore wind leaseholders have proposed a collaborative regional layout for wind turbines (1 x 1 nautical mile apart in fixed east-to-west rows and north-to-south columns, with 0.7-nautical-mile theoretical transit lanes oriented northwest-southeast) across their respective BOEM leases (Geijerstam et al. 2019), which meets the layout rules set forth in the Draft MARIPARS report recommendations." The Joint Developer Agreement Layout is depicted in the SEIS in Figure A.7-17 on page A-41.

Examining the cumulative impacts of structures, the SEIS states in Table 3.11-1: "The cumulative impacts from the presence of structures on navigation hazards with the Proposed Action when combined with past, present, and reasonably foreseeable future activities would be major on commercial and for-hire recreational fisheries ***if*** **offshore wind projects in the RI and MA Lease Areas *do not* all adopt a uniform 1x1 nautical mile WTG spacing with east−west/north−south orientation**" [emphasis added]. This statement from Table 3.11-1 makes clear that major cumulative impacts to fisheries are expressly conditioned upon a **failure to adopt uniform 1x1 NM spacing.** By contrast, because the Joint Developer Agreement Layout **does** adopt a uniform 1x1 NM spacing for the MA/RI WEA, the impacts will be less than major.

The Joint Developer Agreement Layout is consistent with both the Draft and Final MARIPARS and BOEM's assumptions for future OSW development of up to 22 GWs as described in Section A.4 of the Draft SEIS.

It is also important to recognize that the MARIPARS was specifically tailored for the unique circumstances of the MA/RI WEA. While the uniform 1x1 NM spacing may be appropriate for the MA/RI WEA, the recommendations made by the MARIPARS should be construed as applicable to the MA/RI WEA only, and not determinative with respect to other currently existing WEAs, or any future OSW lease areas that may be delineated. Designing an optimized layout for an OSW array requires a case-by-case consideration of site conditions and other highly localized factors.[4] Rigidly imposing the recommendations of the MARIPARS across other presently-

[4] Giebel, G., & Hasager, C. B. (2016). An Overview of Offshore Wind Farm Design. In W. Ostachowicz, M. McGugan, J-U. Schröder-Hinrichs, & M. Luczak (Eds.), MARE-WINT. New Materials and Reliability in Offshore Wind Turbine Technology (pp. 337-346). https://backend.orbit.dtu.dk/ws/portalfiles/portal/127708307/An_Overview_of_Offshore_Wind_Farm_Design.pdf

existing projects or WEAs, or future lease areas, would not adequately address the need for an area-specific analysis.

Transit Lanes Result in Longer Cables which Increase Impacts

Alternative F proposes 2 NM or 4 NM wide transit lanes through the Vineyard Wind lease area and adjacent OSW lease areas. The SEIS states on page 3-29: "Recent forecasts by Vineyard Wind estimate that the length of inter-array cabling would be approximately 221 miles (355 kilometers) under Alternative F with a 4-nautical-mile transit lane and the Proposed Action layout, and 234 miles (376 kilometers) with a 4-nautical-mile transit lane and the Alternative D2 layout; if the transit lane were only 2 nautical miles wide, the length of inter-array cabling would still exceed that in the COP PDE but would be somewhat less than with a 4-nautical-mile transit lane."

On the same page, the SEIS also states: "the potential impacts on finfish, invertebrates, and Essential Fish Habitat (EFH) of Alternative F do not depend on the other turbine layout constraints (Proposed Action, Alternative D2, or any other alternative) or on the width of the transit lane (2 nautical miles or 4 nautical miles), **with the exception that a greater amount of cable would lead to greater impacts**" [emphasis added].

Finally, the SEIS states on page 3-30: "…establishment of additional transit lanes could require increased lengths of offshore export cable and therefore effects to finfish, invertebrates, and EFH."

Based on the foregoing, the 2 NM or 4 NM wide transit lanes considered by Alternative F would have impacts to the aforementioned species due to increases in the length of the Vineyard Wind project's export and inter-array cables.

Transit Lanes Reduce Area Available for WTGs, Thereby Constraining a Significant Mechanism for Mitigating Climate Change

The SEIS states on page 2-5: "As explained in Section 3.14.2.4, BOEM assumes that the addition of all six of the 4-nautical mile transit lanes proposed by RODA would reduce the technical capacity of the Rhode Island and Massachusetts (RI and MA) Lease Areas by approximately 3,300 MW, which is 500 MW less than the current state demand for offshore wind in the area. Furthermore, Alternative F combined with the Alternative D2 layout would not be able to meet existing announced demand as described in Chapter 1."

Climate change **must** be a principal consideration in the decision to approve Vineyard Wind. As related previously, climate change presents an existential threat to commercial fishing interests, not only in southern New England, but along the entire Eastern Seaboard. The deployment of 22 GWs of U.S. Atlantic OSW capacity that the SEIS assumes to be reasonably foreseeable will provide a significant positive cumulative impact by providing significant climate mitigation benefits.

Given the uniform 1x1 NM Joint Developer Agreement Layout, USCG has made a final determination that transit lanes are unnecessary. In fact, the inclusion of transit lanes will directly

constrain the U.S. OSW industry's ability to mitigate climate change, the end result being even greater negative impacts upon fisheries in southern New England and along the Eastern Seaboard.

Transit Lanes Reduce Area Available for WTGs, Thereby Reducing Economic Benefits and Undermining Public Investment

The SEIS considers approximately 22 GWs of U.S. Atlantic OSW capacity as reasonably foreseeable. A recent study by the American Wind Energy Association ("AWEA") states U.S. OSW will support **up to 83,000 jobs and $25 billion per year in economic output by 2030**, while also delivering investment in critical coastal infrastructure. This pipeline of projects is considered sufficient to trigger large manufacturing investments; however, reducing the area by transit lanes will reduce the overall economic benefit that will be realized.

UMass Dartmouth's Public Policy Center conducted a study examining the contribution to employment and economic development to be made by the 800-MW Vineyard Wind project. The study considered impacts to both the economy of the Commonwealth, and the regional economy of southeastern Massachusetts ("SEMA"), and found:

- The Vineyard Wind project will support an estimated 3,180 direct FTE job years in Massachusetts across all phases over the project period under the Base scenario and 3,658 direct FTE job years in Massachusetts in the High scenario.

- The 800 MW project will produce nearly $79 million in direct value-added impacts for Massachusetts and just under $170 million in direct output.

- The study estimates that the amount paid in state and local taxes as a result of the development, construction, and the first year of O&M of the 800 MW Vineyard Wind project is $14.7 million in the Base scenario and $17.0 million in the High scenario.

A reduction in the WEA jeopardizes the project's economic potential and undermines public sector investment. BOEM has entered long-term lease contracts with developers and received lease payments in return for material use of the defined areas in the ocean. Reducing the WEA in a substantial manner results in unstable public policy and creates market uncertainty. A substantial material change in the WEA could lead to re-evaluation of the private sector infrastructure investments. This could ultimately affect the United States or any State's (with an offshore wind policy commitment) ability to secure the supply chain and facilities required to create jobs and develop the offshore wind industry.

V. Conclusion

The Business Network for Offshore Wind and its members strongly encourage BOEM to **reject Alternative F and *adopt Alternative D2* in the Final SEIS. This approval should occur in strict compliance with the One Federal Decision Permitting Timeline published February 7, 2020.**

Offshore wind is poised to make an immediate positive impact on America's economic recovery from the COVID-19 pandemic. The approval of Vineyard Wind is the first step to asserting America's position in this $1 trillion global energy industry, which is a one-in-a-generation economic opportunity in a cutting-edge industry. This is directly consistent with the Administration's focus on infrastructure and the spirit of the June 2020 Executive Order encouraging the development of world-class infrastructure as a means of COVI-19 economic recovery.

By approving Alternative D2, BOEM will solidify investor confidence and drive the U.S. offshore wind industry forward into reality. Offshore wind has already demonstrated its remarkable resilience to the ongoing COVID-19 pandemic.

Make no mistake - the failure to issue a ROD approving Vineyard Wind will likely have catastrophically negative consequences, and hundreds of millions of dollars in high-tech manufacturing investments will be made in markets outside the U.S. **This is an entirely avoidable outcome.**

BOEM should not require additional transit lanes. The United States Coast Guard has determined that, from a navigational perspective, the transit lanes are not necessary given the agreed-upon 1 x 1 nautical mile Joint Developer Agreement Layout. The inclusion of transit lanes will also result in longer export cables, which have greater impacts. Economic development in southeastern New England associated with the Vineyard Wind would also be constrained by the inclusion of transit lanes.

In conclusion, the Business Network for Offshore Wind and its members reiterate that BOEM should reject Alternative F and *adopt Alternative D2* in the Final SEIS.

Very truly yours,

Liz Burdock
President & CEO
Business Network for Offshore Wind