

March 16, 2020

Rear Admiral Andrew J. Tiongson
United States Coast Guard
Commander, First Coast Guard District
408 Atlantic Avenue
Boston, MA 02110-3349

**Re: Docket No.: USCG-2019-0131
Port Access Route Study: The Areas Offshore of MA/RI**

Dear Admiral Tiongson:

The Business Network for Offshore Wind (the “Network”) appreciates this opportunity to provide comments regarding the United States Coast Guard (USCG)’s recent draft Port Access Route Study concerning the areas offshore of Massachusetts and Rhode Island (MARIPARS).

The Network is a 501(c)(3) nonprofit organization focused on the development of the U.S. offshore wind industry and its supply chain. Since 2012, the Network has brought together business and government, both domestically and internationally, to educate and to prepare companies and small businesses to enter the offshore wind market. The Network uses the voice of its diverse membership, comprised of the full spectrum of the offshore wind supply chain, to educate and support federal, state, and local policies to advance the development of the U.S. offshore wind industry.

The Network is a proud partner of the USCG. In fact, the USCG conducted part of its stakeholder outreach for MARIPARS at the Network’s International Partnering Forum (IPF) in New York City in April 2019. The Network looks forward to continuing this positive partnership with the USCG as the U.S. offshore wind industry continues to develop.

The Network supports the recommendation in the MARIPARS report that turbine layouts for the MA/RI WEA “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 operations.” See, MARIPARS at 2, 38. The Network also supports the lane widths and orientations specified in the MARIPARS as appropriate for use in the MA/RI WEA:

- 0.6 – 0.8 NM, in a northwest to southeast direction, for vessel transit;
- 1 NM, in an east to west direction, for commercial fishing vessels actively engaged in fishing; and
- 1 NM, in a north to south and east to west direction, for USCG search and rescue operations.

See, MARIPARS at 38. Crucially, the MARIPARS concluded that, if a standard layout is adopted utilizing the aforementioned spacing, additional transit lanes are not required. The Network finds that these layout and spacing recommendations are appropriately designed for both the unique size and location of the MA/RI WEA leases, and is in full support of this approach.

The recommendations made in the MARIPARS are compatible with international and U.S. guidelines (including USCG NVIC 01-19),¹ which recommend that offshore wind arrays be configured to minimize the number of times a transiting vessel must alter course.

The MARIPARS - acknowledging that the impacts within each lease area must be considered individually - highlights the importance of predictable turbine layouts across lease areas within the MA/RI WEA. By utilizing a uniform turbine layout for the MA/RI WEA, impacts to vessel transits, fishing operations, and USCG search and rescue missions can be minimized.

The MARIPARS has outlined recommended turbine layouts that are appropriate for the unique conditions and circumstances of the lease areas that make up the MA/RI WEA. By agreeing to the turbine configurations outlined in the MARIPARS, MA/RI WEA developers are voluntarily relinquishing a portion of the potential electricity generation capacity of their respective leases. However, it is the Network's position that the generation capacity of the MA/RI leases should not be further reduced by the imposition of additional transit lanes. The MARIPARS presents a balanced, standardized approach that – for the MA/RI WEA – best reconciles the needs of all interested stakeholders.

It is also important to recognize the limits of the recommendations advanced by the MARIPARS. This study was specifically tailored for the unique circumstances of 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 offshore wind lease areas that may be delineated. Designing an optimized layout for an offshore wind array requires a case-by-case consideration of site conditions, waterway uses, and other highly localized factors, with the minimization of wake effects a high priority.² Rigidly imposing the recommendations of the MARIPARS across other WEAs, or future lease areas, would not adequately address the need for an area-specific analysis. The Network recommends that the USCG conduct a similar comprehensive analysis for individual lease areas and/or within adjacent regions, to allow for a balanced approach tailored to the local circumstances of those areas.

The Network appreciates this opportunity to provide feedback regarding this important topic, supports the draft MARIPARS as written, and recommends that it become final. We thank the USCG for your leadership and look forward to continued engagement.

Sincerely,



Liz Burdock, President & CEO
Business Network for Offshore Wind

¹ United States Coast Guard, Navigation and Vessel Inspection Circular No. 01-19, *Guidance on the Coast Guard's Roles and Responsibilities for Offshore Renewable Energy Installations (OREI)*, August 2019, <https://www.dco.uscg.mil/Portals/9/DCO%20Documents/5p/5ps/NVIC/2019/NVIC%2001-19-COMDTPUB-P16700-4-dtd-01-Aug-2019-Signed.pdf?ver=2019-08-08-160540-483>

² 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