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**RE: Draft Northeast Ocean Plan Public Comment Period**

Dear Regional Planning Body Co-leads:

Deepwater Wind is an offshore wind energy company headquartered in Providence, Rhode Island. We are currently installing the the Block Island Wind Farm, America's first offshore wind farm. We hold the two Bureau of Ocean Energy Management (BOEM) leases in the Rhode Island-Massachusetts Wind Energy Area and are actively developing offshore wind projects in other markets along the east coast. We were a stakeholder during the development of Rhode Island's state ocean plan, the Ocean Special Area Management Plan (OSAMP). The OSAMP resulted in legislation which provided a path forward for Rhode Island to become the location of the first offshore wind farm in the United States. We see the value of bringing diverse interests together to discuss how to manage our ocean resources, as we did with our project off Block Island, and are excited to see the SAMP framework being extended into federal waters in the Northeast.

We congratulate the work done by the Regional Planning Body (RPB) to date and hope our comments will be used to improve the Northeast Ocean Plan. Additionally, we look forward to working with the RPB during plan implementation and future iterations of the plan.

The Northeast Ocean Data Portal is a key element of the ocean plan. We see the value in the data portal from both a management agency and an industry perspective. Specifically, agencies like BOEM can use the data and information provided in the portal to make more informed decisions on siting offshore wind energy. Better decisions with the best available data mean our industry has greater success in building offshore wind; we also save time and money due to reductions in permitting inefficiencies. From an offshore developer perspective, the data and maps found in the portal ranging from marine life and habitat to fishing interests and maritime commerce are highly beneficial when developing a permit application. Using the data and information within the portal and plan to identify where potential conflicts may occur is vital to the success of our industry and will allow us to address conflicts before they delay or stop a project. We strongly urge the RPB to ensure data relevant to offshore energy and infrastructure is maintained and updated, including those data sets relevant to the status and location of offshore energy sites, submarine cables, and any data collected from relevant federal agency like BOEM's environmental studies research efforts. We urge the RPB to hold firm on their commitments to advancing, updating, and maintaining all relevant data on the portal.

We also see the value in the marine life and synthesis data products found on the Northeast Ocean Data Portal. Overall, this data will be highly beneficial as we develop offshore wind energy and can be useful when determining project timelines. With respect to the framework for important ecological areas, we urge the RPB to clearly define a transparent process for how these areas will be identified. As it currently stands, the commitment and framework are vague. We understand the value in this framework approach but would like a clearly defined, transparent process that gives ocean users, including the offshore wind energy industry, a comfort level with the process. We urge the RPB to clearly articulate how the identification of important ecological areas will add to or differ from ongoing work and commit to an open, transparent, and scientifically-driven process.

While we are happy with the variety and extensive amount of data and information within the plan and portal, the RPB must also seek to find effective ways to provide notifications to interested parties when updates are made to the plan, Northeast Ocean Data Portal, or new project proposals. For example, a mechanism that alerts portal users that new data layers have been added would greatly benefit industries that utilize and reference the data layers when making development decisions. Additionally, when significant updates to the plan occur, notifying stakeholders must be a priority.

RPB agency commitments to ensure better interagency coordination and early engagement with stakeholders must be adhered to during plan implementation. Specifically, BOEM has made commitments to involve potentially affected stakeholders early in the decision-making process for proposed offshore wind energy projects. Earlier coordination with potentially affected stakeholders like commercial and recreational fishermen (*Commercial*

*Fisheries Action 4*) benefits each stage of offshore wind energy development, including identification of Wind Energy Areas and site specific determinations. Early coordination means sites are chosen with the least impact on industry and the environment. As an offshore wind developer, this is how we operate our business; we saw the benefits this approach provided in state waters, and we fully support this same approach by agencies in a federal management context. We support the broad commitments made by RPB member agencies in the plan to engage stakeholders earlier and more effectively, and ask the agencies to ensure these commitments are met during plan implementation by working with developers and stakeholders to develop specific improvements to current outreach and engagement practices.

The ocean plan performance and monitoring component of the plan should also include a mechanism that allows stakeholders to petition the RPB to consider implementation issues as they arise. The RPB provides a unique opportunity for states, federal agencies, tribes, and ocean users to discuss management of ocean resources. Utilizing this unique forum to address difficult or new management issues as they arise and allowing stakeholders to provide feedback would greatly enhance plan performance. We suggest the RPB add a mechanism into the plan performance and monitoring section of the plan and outline the specifics of this mechanism in the appendices.

Finally, we urge the RPB agencies to prioritize and provide funding to fill the data gaps and research needs identified in Chapter Five of the ocean plan. A regional research and science agenda helps ensure renewable energy developers and others have access to a broad range of data on marine life, habitat areas, cultural resources, maritime commerce, fishing, and other industry uses. This is incredibly valuable and will be used to inform proposals and permitting for new energy or other infrastructure developments across the region. We thank the RPB for their efforts to compile this information and hope commitments to prioritize and fill data gaps during plan implementation will be fulfilled. Additionally, our hope is that BOEM will prioritize funding to fill some of the identified data gaps with Environmental Studies Program funds (*Energy Infrastructure Action 8*), especially where a dual research purpose of advancing understanding of habitat and fisheries complements potential, future offshore wind energy siting.

Thank you for the opportunity to comment on the Northeast Ocean Plan. We appreciate your consideration of our comments, and look forward to working with you as the plan is implemented.

Sincerely,



Aileen Kenney

Vice President of Permitting and Environmental Affairs