

January 11, 2022

Director Amanda Lefton
Bureau of Ocean Energy Management
Office of Public Affairs
1849 C Street, NW
Washington, D.C. 20240

Dear Director Lefton,

We write to you as lead offshore wind representatives from Maine, Massachusetts, and New Hampshire and members of the Gulf of Maine Intergovernmental Renewable Energy Task Force. Collectively, we urge the Bureau of Ocean Energy Management (BOEM) Environmental Studies Program to fund critical baseline research and studies to responsibly advance offshore wind opportunities in the Gulf of Maine.

The recent announcement by Interior Secretary Deb Haaland outlining BOEM's plans to pursue offshore wind leases in the Gulf of Maine by mid-2024 brings renewed urgency to prioritize and invest in important studies related to offshore wind development in this region. The findings of these studies will be important to ensuring offshore wind development in the Gulf of Maine is supported by robust, scientific data on par with data available for other U.S. Outer Continental Shelf areas.

In its National Studies List for 2022, BOEM identifies two studies by the Office of Renewable Energy Programs that seek to provide essential information to aid the planning process prior to leasing of wind energy areas and improve the ability to assess, predict, monitor, and manage potential environmental impacts of offshore wind in the Gulf of Maine. The two studies include an Ecological Baseline Study of the U.S. Outer Continental Shelf Off Maine (AT-22-12), and a Comprehensive Assessment of Existing Gulf of Maine Ecosystem Data and Identification of Data Gaps to Inform Future Research (AT-22-11)

As funding decisions are made for the next Environmental Studies Program, we urge BOEM to invest in the Gulf of Maine. Specifically, we support the prioritization of the Ecological Baseline Study (AT-22-12). In addition, we propose three other studies as a response to BOEM's request to identify data gaps. First, we propose a comprehensive marine mammal and wildlife study. Second, we propose conducting a socio-economic impact analysis. And third, putting all of the data and analyses together, we envision a cumulative impact assessment for the development of offshore wind in the Gulf of Maine. Below we describe each briefly.

As a part of the Ecological Baseline Study, we suggest that BOEM consider investing in targeted benthic habitat surveys, specifically through the collection of high resolution multibeam mapping and ground truthing of the data using sediment sampling and benthic fauna characterization in

order to create detailed sediment and habitat maps. Currently, existing bathymetric and benthic habitat data for the Gulf of Maine is extremely limited. This information is fundamental to determining the areas of complex habitats with associated species habitat use and distribution. Complex habitats are particularly important for several critically vulnerable species in the Gulf of Maine, such as Atlantic cod and American lobster. The benthic surveys should seek to collect data about coral gardens as these biogenic habitats are known to be important for juvenile fish and are sensitive to disturbance.

Next, we suggest that BOEM prioritize a comprehensive marine mammal and wildlife survey for the Gulf of Maine. This survey would protect areas designated as critical habitat for species such as the North Atlantic Right Whale and fill significant data gaps in the distribution, abundance and utilization of the Gulf of Maine by avian species. We also seek support for the collection of additional fisheries data in partnership with NOAA Fisheries and state marine resource agencies to inform our understanding of the potential impact of offshore wind development on regional fisheries.

In addition to marine environment and species-specific studies and based on extensive engagement with stakeholders in New England, we have identified the need to better understand the potential socio-economic impact of offshore wind development on fishing communities. For example, Maine's floating offshore wind research array stakeholder process demonstrated the lack of socioeconomic data integral to estimating economic impacts to existing ocean users, including the fishing communities. Second, the recently released Responsible Offshore Development Alliance (RODA) Research Priorities 2022 Report identified economic impacts as one of the important topics to stakeholders impacted by offshore wind deployment.

Finally, putting these together, it would be useful to conduct a cumulative impact analysis to increase our collective understanding of the potential impacts of offshore wind development on our natural resources, existing uses, industries and people.

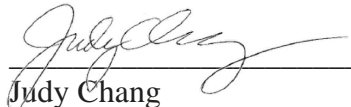
The above proposed data collection and analyses are important to provide a comprehensive understanding of the potential impact of offshore wind development in the Gulf of Maine. Such information would be useful to support offshore wind decision-making in the Gulf of Maine through all phases of offshore wind development. These studies will provide invaluable information to support our understanding of the region and further BOEM's goals to advance development of offshore wind in an environmentally and economically responsible way.

Thank you for your consideration of this important matter. We look forward to working with you and your staff to initiate these essential studies and expand our knowledge of the Gulf of Maine ecosystem to responsibly develop offshore wind.

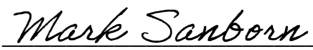
Sincerely,



Dan Burgess
Director
Governor's Energy Office
State of Maine



Judy Chang
Undersecretary of Energy and Climate Solutions
Executive Office of Energy and
Environmental Affairs
Commonwealth of Massachusetts



Mark Sanborn
Department of Environmental Services
Assistant Commissioner
State of New Hampshire