



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT

WASHINGTON, DC 20240-0001

Mr. Patrick Wycko
United States Coast Guard

Dear Mr. Wycko:

Thank you for the opportunity to comment on the final report issued by the Atlantic Coast Port Access Route Study (ACPARS) work group and the accompanying Marine Planning Guidelines. As one of our key federal partners for ensuring the safety of offshore energy activities, BOEM appreciates the collaborative partnership it has built with the U.S. Coast Guard over the years in support of our oil and gas program, and most recently, with respect to the implementation of our emerging offshore renewable energy program.

While BOEM strongly supports the development of guidelines that will reduce risks to offshore wind facilities and the maritime community, the Bureau does have concerns about the timing of when the guidelines are applied in our planning and leasing process and the inclusion of precise recommended buffer distances. As we have previously expressed and reflected in our leasing decisions, the Bureau strongly believes that site-specific development of setback distances that consider the unique characteristics of each project/area is the most appropriate method for establishing the necessary buffers.

BOEM strives to ensure that lessees have sufficient flexibility to microsite a project within their lease areas, especially given that data critical to siting decisions (e.g., results from geophysical and geotechnical surveys, environmental surveys, site specific resource assessment data, etc.) will not be gathered until after lease issuance. Applying setbacks too early in the planning and leasing phase of the program may unnecessarily eliminate areas that eventually are determined to be productive and a low risk to mariners. Allowing for flexibility on setback distances and evaluating detailed developer proposals on a case-by-case basis will ensure the federal government makes an informed decision when approving renewable energy development on the Outer Continental Shelf. Additionally, awareness and incorporation of emerging technologies, mitigation measures, and evolving best practices (as reflected, for example, in the updated Marine Guidance Note from the United Kingdom) at the time that BOEM is evaluating a specific wind farm, will lead to better decisions that more appropriately balance the many uses of the Outer Continental Shelf.

Again thank you for your efforts and the opportunity to comment. I personally remain committed to ensuring that the missions of both of our agencies can continue to be met. I look forward to continuing to work with you on advancing the offshore renewable energy program that is vital to the Nation's energy future and independence. Please feel free to contact me if you have any questions or would like to discuss further.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Abigail Ross Hopper', written in a cursive style.

Abigail Ross Hopper
Director