



July 27, 2020

James Bennett
 Program Chief, Renewable Energy
 Bureau of Ocean Energy Management

**RE: BOEM-2020-0005
 Vineyard Wind Supplement to the Draft Environmental Impact Statement**

Dear Program Chief Bennett,

The undersigned organizations and our thousands of members and supporters across the northeast region appreciate the opportunity to submit comments on the *Vineyard Wind Supplement to the Draft Environmental Impact Statement (SEIS)*, which was published to the Federal Register on June 12, 2020.

As businesses, associations, institutions, labor unions, and NGOs with significant operations in New England, we write to express our support for policies and programs that encourage the expansion of responsibly developed offshore wind in our region. We strongly recommend that BOEM promptly move the Vineyard Wind I project forward.

Offshore wind is our region's best opportunity for new sources of energy¹. This clean energy resource is the single biggest lever we can pull to reduce emissions, address the climate crisis, and grow the

¹ Weiss, Jürgen and Hagerty, John Michael, "Achieving 80% GHG Reduction in New England by 2050," *The Brattle Group*, slide 11,
https://brattlefiles.blob.core.windows.net/files/17233_achieving_80_percent_ghg_reduction_in_new_england_by_20150_september_2019.pdf

economy at the same time. All New England states have mandated emissions limits or goals, and offshore wind energy is critical for meeting those targets.

Per ISO-New England's analyses, around 1/6 to 1/3 of New England's old fossil fuel plants will likely retire over the next decade², and it is imperative that we fill any gap with clean energy. Closing these plants and replacing them with offshore wind will also reduce pollution and lead to improved air quality, which as COVID-19 has clearly demonstrated, is an extremely important public health issue.³ The SEIS itself recognizes this and also recognizes that without offshore wind, "additional, more polluting, fossil fuel energy facilities would come or be kept on-line to meet future power demand." This outcome would be unacceptable from a climate and health perspective, as well as from an economic standpoint.

The economic potential of offshore wind must be recognized, and this potential is more important in this time of a severe economic downturn. When Massachusetts awarded the 20-year contract for 800 MW of power from Vineyard Wind 1, the Department of Energy Resources projected direct and indirect benefits to ratepayers totaling \$1.4B in 2017 net present value dollars. Vineyard Wind claims \$3.7 billion in energy related cost savings over the life of the project. As the cost of this energy resource continues to decline, offshore wind will save ratepayers further billions of dollars over the terms of their contracts.

Analyses by the American Wind Energy Association (AWEA) have found that the responsible expansion of this industry would bring at least 83,000 jobs as well as generate annual economic impacts of \$25 billion by 2030⁴. The clean energy industry has suffered enormous job loss in this economic crisis— Massachusetts alone lost nearly 19,000 clean energy jobs during April and May. Offshore wind could bring those jobs back and provide economic growth opportunities. The Vineyard Wind 1 project will alone create 3,600 jobs for local residents, and potentially create tens of thousands more as the supply chain and additional projects are built out over the next several years. This project presents a tremendous opportunity for the highly skilled, unionized New England workforce, particularly in the manufacturing and building trades.

The SEIS claims that if Vineyard Wind 1 is not approved, the economic potential of the offshore wind industry will be realized by future projects. However, this claim ignores the possibility that the failure of this project would have a chilling effect on future investment and would send the signal that the United States is not serious about offshore wind. If Vineyard Wind 1 is not approved, the chances this industry moves forward in the United States would be severely compromised, potentially resulting in a reduction in projects built, as well as uncertainty in manufacturing supply chain investment.

We believe strongly in the responsible development of offshore wind. The SEIS reinforces our belief that offshore wind energy can be developed in a manner that protects wildlife and habitat and should advance as quickly as responsible development allows. Vineyard Wind worked with environmental

² "ISO New England Status of Non-Price Retirement Requests and Retirement De-List Bids," *ISO New England*, August 17, 2018.

³ Xiao Wu and Rachel C. Nethery, "Exposure to air pollution and COVID-19 mortality in the United States," *Harvard T.H. Chan School of Public Health*. April 5, 2020, <https://projects.iq.harvard.edu/covid-pm>

⁴ Hensley, John and Wanner, Celeste, "U.S. Offshore Wind Power Economic Impact Assessment," *American Wind Energy Association (AWEA)*: 1, https://supportoffshorewind.org/wp-content/uploads/sites/6/2020/03/AWEA_Offshore-Wind-Economic-ImpactsV3.pdf.

advocates to come to a landmark agreement on procedures and practices that will help protect the North Atlantic right whale during project construction.

We support the uniform 1x1 nautical mile grid layout and commend the offshore wind industry for finding this compromise with the fishing industry, which the US Coast Guard found allows for safe navigation through the wind energy areas.⁵ We oppose additional transit lanes through the wind energy areas, which would greatly reduce the amount of energy that could be produced, render this offshore wind project not viable, and seriously curtail our ability to mitigate the severe impacts of climate change.

Thank you for the opportunity to comment on this analysis. It is an important step toward considered and efficient shared use of this valuable energy resource. We hope you will support the expansion of responsibly developed offshore wind to realize the energy potential of the MA/RI Wind Energy Areas.

Sincerely,

Craig S. Altemose, Executive Director – **350 Massachusetts**

Douglas Bechtel, President – **New Hampshire Audubon**

Jennifer Benson, President – **The Alliance for Business Leadership**

Hillary Bright, Director of Special Projects – **BlueGreen Alliance**

Lori Brown, Executive Director – **Connecticut League of Conservation Voters**

Heather Burns, CEO – **CT Sustainable Business Council**

Timothy Carter, President – **Second Nature**

Priscilla De La Cruz, President – **Environmental Council of Rhode Island**

Sarah Dooling, Executive Director – **(MCAN) Massachusetts Climate Action Network**

Paula Garcia, Bilingual Energy Analyst, Climate and Energy Program – **Union of Concerned Scientists**

Alli Gold Roberts, Director, State Policy – **Ceres**

Lois Happe, President – **Eastern CT Green Action**

Susannah Hatch, Clean Energy Coalition Director – **Environmental League of Massachusetts**

Susan Helms Daley, MA Leadership Team – **Mothers Out Front**

Amber Hewett, Campaign Manager, Offshore Wind Energy – **National Wildlife Federation**

Ravijit Paintal, CEO – **Autonomous Marine Systems**

Charles J. Rothenberger, Climate & Energy Attorney – **Save the Sound**

⁵ United States Coast Guard, The Areas Offshore of Massachusetts and Rhode Island Port Access Route Study, USCG-2019-0131, January 22, 2020. p. 2.

Kai Salem, Policy Coordinator – **Green Energy Consumers Alliance**

Marc Scully, President – **People’s Action for Clean Energy**

Dan Weeks, Employee-Owner, Director of Market Development – **ReVision Energy**

Rob Werner, New Hampshire State Director – **League of Conservation Voters**

Jessica Wolff, MBA, MSN, U.S. Director of Climate and Health – **Health Care Without Harm**

David Zeek, Offshore Wind Chair – **Massachusetts Sierra Club**

Cc:

Governor Charlie Baker

Governor Ned Lamont

Governor Janet Mills

Governor Gina Raimondo

Governor Phil Scott

Governor Chris Sununu