

Participating Organizations

- Alliance for a Living Ocean
- American Littoral Society
- Asbury Park Fishing Club
- Atlantic Highlands Arts Council
- Bayshore Regional Watershed Council
- Bayshore Saltwater Flyrodders
- Belford Seafood Co-op
- Belmar Fishing Club
- Beneath The Sea
- Bergen Save the Watershed Action Network
- Berkeley Shores Homeowners Civic Association
- Cape May Environmental Commission
- Central Jersey Anglers
- Citizens Conservation Council of Ocean County
- Clean Air Campaign, NY
- Clean Water Action
- Coalition Against Toxics
- Coalition for Peace & Justice/Unplug Salem
- Coastal Jersey Parrot Head Club
- Communication Workers of America, Local 1075
- Concerned Businesses of COA
- Concerned Citizens of Bensonhurst
- Concerned Citizens of COA
- Concerned Citizens of Montauk
- Eastern Monmouth Chamber of Commerce
- Environment NJ
- Fishermen's Conservation Association, NJ Chapter
- Fishermen's Conservation Association, NY Chapter
- Fishermen's Dock Cooperative, Pt. Pleasant
- Food and Water Watch, NJ
- Friends of Island Beach State Park
- Friends of Liberty State Park, NJ
- Friends of the Boardwalk, NY
- Garden Club of Allenhurst
- Garden Club of Bay Head and Mantoloking/Seaweeders
- Garden Club of Brielle/Bayberry
- Garden Club of Englewood
- Garden Club of Fair Haven
- Garden Club of Long Beach Island
- Garden Club of RFD Middletown
- Garden Club of Morristown
- Garden Club of Navessin
- Garden Club of New Jersey
- Garden Club of New Vernon
- Garden Club of Oceanport
- Garden Club of Princeton
- Garden Club of Ridgewood
- Garden Club of Rumson
- Garden Club of Sea Girt/Holly
- Garden Club of Short Hills
- Garden Club of Shrewsbury
- Garden Club of Spring Lake
- Garden Club of Terra Nova
- Garden Club of Washington Valley
- Great Egg Harbor Watershed Association
- Green Party of Monmouth County
- Green Party of New Jersey
- Highlands Business Partnership
- Hudson River Fishermen's Association
- Jersey Shore Captains Association
- Jersey Shore Parrot Head Club
- Jersey Shore Partnership
- Junior League of Monmouth County
- Keyport Environmental Commission
- Kiwanis Club of Shadow Lake Village
- Leonardo Party & Pleasure Boat Association
- Mantoloking Environmental Commission
- Marine Trades Association of NJ
- Monmouth Conservation Foundation
- Monmouth County Association of Realtors
- Monmouth County Audubon Society
- National Coalition for Marine Conservation
- Natural Resources Protective Association, NY
- NJ Beach Buggy Association
- NJ Environmental Lobby
- NJ Friends of Clearwater
- NJ Marine Education Association
- Nottingham Hunting & Fishing Club, NJ
- NYC Sea Gypsies
- NY Marine Education Association
- NY/NJ Baykeeper
- Ocean Wreck Divers, NJ
- PaddleOut.org
- Piscataway Saltwater Sportsmen Club
- Raritan Riverkeeper
- Religious on Water
- Rotary Club of Point Pleasant
- Rotary District #7540—Interact
- Saltwater Anglers of Bergen County
- Sandy Hook Bay Anglers
- Save Barnegat Bay
- Save the Bay, NJ
- SEAS Monmouth
- Shark Research Institute
- Shark River Cleanup Coalition
- Shark River Surf Anglers
- Sierra Club, NJ Shore Chapter
- Sisters of Charity, Maris Stella
- South Monmouth Board of Realtors
- Staten Island Tuna Club
- Strathmere Fishing & Environmental Club
- Sunrise Rod & Gun Club
- Surfers' Environmental Alliance
- Surfrider Foundation, Jersey Shore Chapter
- Surfrider Foundation, South Jersey Chapter
- TACK 1, MA
- Unitarian Universalist Congregation/Monm. Cnty.
- United Boatmen of NJ/NJ
- Viking Village
- WATERSPIRIT
- Women's Club of Brick Township
- Women's Club of Keyport
- Women's Club of Long Branch
- Women's Club of Merchantville
- Women's Club of Spring Lake
- Zen Society, NJ



*Ocean Advocacy
Since 1984*

August 19, 2020

Aida Camacho-Welch
Secretary of the Board
State of New Jersey
Board of Public Utilities
44 South Clinton Ave
Trenton, New Jersey 08635

RE: Docket No. QO20070478 – Draft New Jersey Offshore Wind Second Solicitation Guidance Document

Dear Secretary Camacho-Welch:

Clean Ocean Action (“COA”) thanks the New Jersey Board of Public Utilities (“NJBP”) for the opportunity to provide comments on the Draft New Jersey Offshore Wind Second Solicitation Guidance Document (“Draft Guidance Document”). COA is committed to ensuring offshore wind energy is developed in the most environmentally responsible manner possible and understands the importance that the Draft Guidance Document plays in the future of offshore wind energy development in the New York/New Jersey region.

COA is a New Jersey-based regional environmental non-profit organization focused on protecting and enhancing the marine and coastal environments of New York and New Jersey. COA consists of a broad-based coalition of over 125 active boating, business, community, conservation, diving, environmental, fishing, religious, service, student, surfing, and women's groups. COA has been actively following offshore wind developments in the New York/New Jersey Bight for the past decade. Over the past several years, COA has actively engaged with NJBP, the New Jersey Department of Environmental Protection (“NJDEP”), and other state and federal agencies regarding offshore wind development. This includes serving as a stakeholder on the NJDEP’s Offshore Wind Environmental Resources Working Group.

COA supports the environmentally responsible development of offshore wind energy, and advocates for a balanced approach that recognizes the urgency of developing affordable and reliable renewable energy in the context of the numerous potential negative impacts offshore wind development may have. COA believes offshore wind can and must be developed while acknowledging in a way that addresses the potential impacts by stipulating policies to avoid, and reduce negative impacts, and ensure meaningful mitigation of the unavoidable. Overall, COA is encouraged by the level of detail outlined in the Draft Guidance

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Document and appreciates the requirements that are forward-looking in terms of ensuring a clean resilient energy grid. This includes the requirements that the applicants address whether the project will include energy storage capabilities, and information related to the developer's intent to use technologies aimed at reducing peak demand electric generation. These are just some of the key aspects that illustrates New Jersey's commitment to ensuring offshore wind development is done right.

However, COA urges NJBPU to include the following requirements outlined in these comments in the Final Solicitation Guidance Document to further ensure that the development of offshore wind does not come at the expense of New Jersey's marine and coastal ecosystems. These include added obligations for developers in the Environmental Protection Plan, Fisheries Protection Plan, Economic Development Plan, Interconnection Plan, and Operation and Maintenance Plan. Additionally, and most importantly, COA objects to the current structure of the Criteria for Evaluation. Specifically, the weighted evaluation system which gives insufficient attention to environmental impacts. While the solicitation does require assessment of environmental concerns if the NJBPU does not give this adequate consideration in the evaluation of applications, it is a false premise and environmental protections will be severely undermined.

I. Section 3.9 – Environmental Protection Plan & Section 3.10 – Fisheries Protection Plan

The Environmental Protection Plan and the Fisheries Protection Plan described in sections 3.9 and 3.10, respectively, are essential to ensuring the responsible development of offshore wind energy off the coast of New Jersey. Together, these plans outline the details, information, and commitments prospective offshore wind developers must provide to NJBPU as part of their application. Therefore, it is critical that these plans include robust, meaningful mandates to establish that the applicants' prospective projects do not cause harm to either the marine and coastal habitats and ecosystems, or the commercial and recreational fishing industries. Thus, COA urges NJBPU to include the following requirements in the Environmental Protection Plan and Fisheries Protection Plan: (1) a requirement that the applicant include a cumulative environmental impact assessment, (2) a requirement for the applicant to address impacts to navigation and transit, and (3) a requirement that the baseline and monitoring data collected by the chosen applicant be made publicly available.

A. Requirement for a Cumulative Environmental Impact Assessment

COA urges NJBPU to include an explicit requirement for applicants to address the cumulative impacts to both the environment and the commercial and recreational fishing industries. Offshore wind development is not occurring in a vacuum and the applicants must address not only the impacts from their proposal, but from their proposal in combination with existing offshore development, and reasonably foreseeable and anticipated developments. It is not enough for the applicant to simply address the prospective environmental impacts from their project alone. As the state moves to meet the goal of 7,500 MW of offshore wind capacity by 2035, potential offshore wind projects must be understood in context of this larger goal. This includes understanding the impacts of the specific project in relation to already permitted projects, as well as areas for prospective development. Therefore, NJBPU must require the applicant to develop a plan for a cumulative impact assessment which will focus on the

environmental impacts from the applicant’s proposed project in relation to future offshore wind developments in the New York/ New Jersey Bight including: (1) existing offshore wind farms, and (2) future offshore wind developments indicated by areas that have been leased or finalized as Wind Energy Areas by the Bureau of Ocean Energy Management.

COA understands and appreciates the challenge that a cumulative impact analysis of this scope and magnitude requires. However, the necessary information to effectively undergo this evolution is readily available and others have already begun providing cumulative analyses elsewhere in the U.S. for offshore wind development.

Within the next several months, both Orsted’s Ocean Wind project and Equinor’s Empire Wind project are expected to release their Construction and Operation Plans, which detail all essential information related to those developments. This includes specific details on the number of turbines, points of interconnection, cable routes, turbine configuration and spacing, operation and maintenance plan, and environmental impacts. Moreover, NJBPU has finalized the solicitation schedule, outlining how New Jersey will reach its goal of 7,500 MW by 2035. The solicitation schedule contains key information such as the number of future offshore wind projects, timelines for these projects, and capacity requirements. This information, when combined with an understanding of the current lease areas and wind energy areas within the study area of the recently published New Jersey Offshore Wind Strategic Plan, provides a strong foundation from which to develop a meaningful cumulative impacts assessment for offshore wind development.

Furthermore, the recent publication of the Supplemental Environmental Impact Statement (“SEIS”) for the Vineyard Wind Project in Massachusetts illustrates that cumulative impact assessments for offshore wind can and must be performed. In July of 2020, the Bureau of Ocean Energy Management (“BOEM”) published the SEIS, which exclusively focused on cumulative impacts from the project in relation to others in the same geographical area. The SEIS, analyzed “reasonably foreseeable effects from an expanded cumulative activities scenario for offshore wind development.”¹ The results of the SEIS detailed the importance of early planning and a robust cumulative impact analysis. The SEIS concluded that the proposed action, as well as all six alternatives, would result in “major impacts” to both commercial and recreational fishing as well as navigation.² The previous project-specific Environmental Impact Statement found that, individually, Vineyard Wind would only result in “minor” to “moderate” impacts to these industries.³ The SEIS and cumulative impact analysis illustrates how the impacts change when viewed in relation to the surrounding developments and outlined why it is essential that regulators engage in cumulative impact analyses that focus on the development of the offshore wind industry holistically, as well as on an individual project-by-project basis.

For these reasons, COA urges NJBPU to mandate as part of the Final Guidance Document, that applicants provide a detailed plan describing how they will evaluate, analyze,

¹ Bureau of Ocean Energy Management, Vineyard Wind – Supplemental Environmental Impact Statement, Docket No. BOEM 2020-025, at 1-1. (Hereinafter “SEIS”).

² SEIS, at ES-5.

³ Bureau of Ocean Energy Management, Vineyard Wind – Draft Environmental Impact Statement, Docket No. BOEM 2018-060, at ES-8.

and plan for cumulative impacts in light of reasonable foreseeable offshore wind projects in the New York/New Jersey Bight. If the State of New Jersey is truly committed to the environmentally responsible development of offshore wind, cumulative impacts must be addressed.

B. Requirement for Applicant to Address Impacts to Navigation and Transit

Additionally, COA petitions NJBPU to require as a component of both the Environmental Protection Plan and the Fisheries Protection Plan that the applicant address the impacts and threats to navigation and transit routes. The development of offshore wind resources will undoubtedly have impacts on navigation and transit in the New York/ New Jersey Bight, and as currently written the Draft Guidance Document does not require the applicants to address these impacts.

New Jersey is a hub for marine commerce with several ports of significance, including the Port of New York and New Jersey (“Port of NY/NJ”). The Port of NY/NJ handles over 10,000 deep draft vessels each year, making it the third largest port in the United States, and the largest on the east coast. There is concern that offshore wind development will displace traditional navigation and transit routes, resulting in increased vessel density – the amount of ships operating within the same sea space, within a now narrower corridor. The displacement would create a funneling effect, constricting traffic between turbine arrays and thereby increasing the number of ships operating in other transit lanes. The impacts from this are threefold.

First, it may result in increased vessel collisions either with turbines or other vessels. As more vessels operate within the same space, the risk of accidents from collisions will increase. The risk of collision creates an increased risk of spillage, which extremely troublesome when you consider the materials the Port of NY/NJ handles. The Port of NY/NJ is the largest petroleum products port in the nation, and deals with other products such as chemicals, plastics, and pharmaceuticals, that would be devastating if spilled into the marine environment.

Second, increased vessel density, as well as the overall increase in transit from construction and operation of the wind farm, may increase the risk of collisions with marine mammals, such as the critically endangered North-Atlantic Right Whale. The North Atlantic Right Whale has an estimated global population of only 450-500 individual animals. The species has failed to recover from whaling despite a 77-year-old international ban. Given the whales’ endangered status, and the known impacts that collisions cause, including injury and mortality to the species, additional precautionary measures are necessary for their protection. These additional protective measures include an evaluation of impacts to navigation from offshore wind development. As more vessels are funneled into a smaller space, there is potential for increased collisions with wildlife.

Third, the changes in navigation patterns may disrupt commercial fishing activities by blocking existing transit routes, thereby creating barriers to historical fishing grounds. Moreover, even if access is still available, increases in transit time to and from fishing areas will impact the commercial and recreational fishing industries.

The Draft Guidance Document must include a requirement to address impacts to navigation and transit to ensure that the full scope of impacts from the development are documented, and ultimately avoided or mitigated.

C. Requirement that Baseline and Monitoring Data be Publicly Available

COA also urges NJBPU to require that the monitoring data the applicant collects pursuant to N.J.A.C. 14:8-6.5(a)(16) be made publicly available. The environmentally responsible and successful development of offshore wind requires an essential commitment of transparency from both the State and offshore wind developers. Transparency is the gateway to meaningful and considered public involvement, which is critical for the success of the offshore wind industry in New Jersey.

Currently, the offshore wind industry is in its infancy in the United States. Therefore, the full range of environmental impacts associated with the development of offshore wind energy from construction through decommissioning are not fully understood. The initial offshore wind projects will be vital to closing data gaps, identifying trends associated with marine life, and documenting potential negative impacts. As such this information must be used to inform and strengthen all future solicitations and developments. As such, the monitoring data related to impacts to the marine environment must be made publicly available so elected officials, commercial and recreational fishermen, environmentalists, and academics can utilize their specific expertise and ensure environmental protections throughout the process of the development and decommissioning of offshore wind facilities in the New Jersey area.

II. Section 3.8 – Economic Development Plan

The Economic Development Plan requires the applicant to address the expected economic development impacts on New Jersey communities, including any plans to use offshore wind infrastructure already planned for New Jersey, such as the New Jersey Wind Port, as well as any plans to use alternative infrastructure located in New Jersey or elsewhere.

COA supports NJBPU’s requirement that applicants address the ability to use wind infrastructure already planned for the New Jersey. However, COA urges NJBPU to be more forceful. Specifically, the NJBPU should include as a requirement of the Economic Development Plan that the applicant demonstrate, to the extent technologically and economically feasible, a commitment to utilizing the New Jersey Wind Port and/or Port of Paulsboro for project manufacturing, marshalling, and assembly. The State has committed to investing significant economic resources into the development of these ports at a time of economic distress resulting from the COVID-19 pandemic; developers should prioritize these facilities to provide a return on the investment by the State. NJBPU should require applicants to demonstrate, to the extent technologically and economically feasible, a commitment to utilizing the New Jersey Wind Port and/or Port of Paulsboro for project manufacturing, marshalling, and assembly. This requirement will not only have economic benefits for the state but will also ensure that the industrial components of offshore wind development are centralized in strategic locations, and not sprawled throughout the state. As a coastal state with the highest population density in the United States, there is significant concern about the level of coastal development necessary to support the emerging offshore wind industry and supply chain and how these coastally dependent

developments will impact the marine and coastal environment. While offshore wind development will be critical to cutting greenhouse gas emissions and minimizing future climate impacts, the development needed for the industry is coming at a time where the Jersey Shore is under threat from climate impacts. Sea level is rising more rapidly in New Jersey than anywhere else in the U.S. According to NJDEP's most recent report, sea level in New Jersey could rise 1.1 ft. by 2030, 2.1 ft. by 2050, and 6.3 ft. by 2100.⁴ These higher water levels will have significant impacts such as erosion, coastal flooding of low-lying areas, and increased salinity of estuaries and aquifers. Moreover, storms are expected to increase in both frequency and intensity. New Jersey must drastically change how it views coastal development and begin preparing for existing and anticipated climate impacts. This includes working to centralize water-dependent coastal development like offshore wind infrastructure. Requiring applicants to show a commitment to utilizing pre-established offshore wind ports will centralize development and help limited industrialization of the Jersey shore.

Additionally, COA petitions NJBPU to expand the Economic Development Plan to require the applicant to consider secondary impacts from the influx in employment in centralized areas that will follow the development of the offshore wind industry. The US offshore wind market is expected to expand rapidly, creating short-term and long-term jobs, including offshore wind-specific occupations that are not yet established in the United States. To accommodate this influx of workers, as well as migration of intrastate workers as we develop a localized workforce, significant infrastructure investments will be needed in the concentrated areas of offshore wind development, such as the New Jersey Wind Port, Port of Paulsboro, and various operation and maintenance ports. These secondary impacts must not be overlooked and issues related to housing needs, mass transit constraints, emergency services, as well as access to sewer, water, and electricity must be evaluated. The Final Guidance Document must have the applicant address and plan for these secondary impacts.

III. Section 3.12 – Interconnection Plan

COA urges NJBPU to include a requirement that the applicant address impacts to benthic resources from cable installation. Specifically, applicants must be required to demonstrate: (1) the ability to use minimally invasive techniques where practicable, and (2) achieving sufficient burial depths to avoid interference with fishing gear and to minimize impacts to burrowing species. Priority should be given to projects and cable access routes where the applicant can establish the ability to avoid hard bottom habitats and submerged aquatic vegetation.

Additionally, applicants must be required to address the potential for cable exposure over the lifetime of the project. The subsea terrain can shift in as little as six months and ocean currents can move sand away from the cable leaving previously buried assets exposed, increasing the risk of damage and corrosion. In the Netherlands, several case studies show that mobility of seafloor sediments and sand re-exposed previously buried cables. In response, developers created

⁴ Kopp, R.E., C. Andrews, A. Broccoli, A. Garner, D. Kreeger, R. Leichenko, N. Lin, C. Little, J.A. Miller, J.K. Miller, K.G. Miller, R. Moss, P. Orton, A. Parris, D. Robinson, W. Sweet, J. Walker, C.P. Weaver, K. White, M. Campo, M. Kaplan, J. Herb, and L. Auermuller. New Jersey's Rising Seas and Changing Coastal Storms: Report of the 2019 Science and Technical Advisory Panel. Rutgers, The State University of New Jersey. Prepared for the New Jersey Department of Environmental Protection. Trenton, New Jersey.

calibrated models of movement of sand waves that can be used to predict the risk at locations along the transmission route.⁵ COA recommends that all offshore wind developers assess the potential for cable exposure by (1) performing bathymetric surveys to identify sand waves, (2) sampling the benthic soils to assess particle size and potential distribution, and (3) assessing seabed currents.⁶ Moreover, several approaches to limit potential re-exposure have been developed such as increased burial depths in areas of expected sand waves, sweeping the seabed flat prior to installation where environmentally appropriate to do so, and avoiding areas with high currents causing significant sediment movement.⁷ Where studies indicate potential impacts from sand waves and ocean currents, these approaches must be used. COA therefore urges NJBPU to require all applicants to address the likelihood of exposure and develop plans for reburial that minimize impacts to benthic resources.

IV. Section 3.14 – Operation and Maintenance Plan

Section 14 requires that the applicant address information related to the operation and maintenance of the proposed offshore wind project. COA urges NJBPU to expand the requirement that the applicant “identify the primary risks to built infrastructure” and how these “shall be mitigated” to include an explicit requirement that all built infrastructure be made climate resilient to handle expected climate impacts. It must also consider priority protection and consideration of existing natural shoreline areas which currently serve as buffers. Studies have shown natural systems are better able to handle storm impacts. They are also critical for stormwater management.

As explained above, climate change is already impacting New Jersey, and the impacts are expected to increase in severity. The development of the offshore wind industry is an investment in the future of the State from both an energy and economic perspective. Therefore, onshore infrastructure, such as operation and maintenance ports, must be built and managed to withstand climate impacts. Applicants must be required to identify suitable locations for operation and maintenance ports that account for the area’s exposure to climate impacts such as coastal flooding, storm surge, and sea level rise. The applicant must also address the vulnerability of the infrastructure to be developed to these impacts. Preference should be given to development plans that reduce impacts by locating assets and new port development in areas that are less exposed to climate hazards, and by making the development better able to cope with climate impacts as and when they materialize. The development of this infrastructure should also consider the impacts elsewhere, such as the potential contribution to flood risk resulting from increases in paved surfaces.

The State of Massachusetts took steps to create climate resiliency with its offshore wind infrastructure by including a hurricane barrier in its design for the New Bedford Marine Commerce Terminal. The Hurricane Barrier stretches across the water from the south end of New Bedford to the Town of Fairhaven. The barrier’s 150-foot opening closes during hurricane conditions and coastal storms and makes the Harbor one of the safest hubs on the eastern

⁵ See, Bureau of Ocean Energy Management, *Offshore Electrical Cable Burial for Offshore Wind Farms on the OCS*, Project No. 671. (November, 2011).

⁶ *Id.* at 72.

⁷ *Id.* at 64.

seaboard. New Jersey should continue to illustrate its leadership by requiring applicants to address climate change by mandating climate-resilient built infrastructure.

Additionally, COA urges NJBPU to explore ways to centralize operations and maintenance developments, and mandate centralization where feasible. The current solicitation schedule breaks the 7,500 MW goal into six distinct projects. To avoid the over-industrialization of the Jersey Shore, efforts should be made to avoid the need for project specific operation and maintenance facilities. COA urges NJBPU to include in the Final Guidance Document a requirement that the applicant demonstrate steps to minimize the overall footprint of operation and maintenance facilities. These steps may include: (1) updating existing port facilities for offshore wind operation and maintenance readiness as opposed to new port development, (2) avoiding development on essential climate buffers and public lands, and (3) pursuing agreements with other offshore wind developers, where feasible, to share access to operation and maintenance ports to minimize the need for project specific port development.

V. Criteria for Evaluation

Finally, COA seeks clarity on the criteria for evaluation and urges NJBPU to give more consideration to the Environmental Impacts component, as well as include consideration of the impacts to commercial and recreational fishing interest.

Currently, the Draft Solicitation Guidance Document does not include any consideration of the impacts to the commercial and recreational fishing communities in its criteria for evaluation. The document makes clear that only six criteria are considered: OREC purchase price, economic impacts, ratepayer impacts, environmental impacts, and strength of guarantees of economic impacts. It is unacceptable that impacts to the fishing industry are not addressed in the evaluation of applications. The NJBPU must consider the impacts proposed offshore wind development will have on the commercial and recreational fishing industries to protect these pre-existing ocean uses that provide economic benefits to the state. Furthermore, if no weight is given to the impacts to the fishing industry, and the industries that depend on them such as restaurants, the purpose of the Fisheries Protection Plan becomes unclear.

Furthermore, COA disagrees with NJBPU's current weighted evaluation of the criteria, as the current structure gives insufficient attention to environmental impacts. The offshore wind industry is still in its infancy and there are significant unknowns and data gaps relating to the scope and impact the development will have on the marine and coastal environment. Furthermore, the initial projects in the area must develop the supply chain and ancillary industries, which will require significant industrial development throughout the state. Therefore, the NJBPU should not overlook the environmental impacts and thus must afford more weight to the applicant's ability to demonstrate net positive impacts, as well as avoidance and reduction of environmental harm.

VI. Conclusion

Thank you for the opportunity to submit comments on the Draft Solicitation Guidance Document. COA is committed to ensuring that the offshore wind industry is developed in the most environmentally responsible manner possible and appreciates NJBPU's efforts to evaluate

the environmental impacts of the prospective offshore wind projects. The recommendations outlined in these comments seek to strengthen the solicitation process by increasing the assurances from offshore wind developers to ensure they meet New Jersey's high standards of environmental protection.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Peter Blair", is positioned to the left of a vertical line.

Peter Blair, Esq.
Policy Attorney
Clean Ocean Action