



July 26, 2021

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

Submitted electronically via <https://www.regulations.gov/commenton/BOEM-2021-0041-0001>

RE: Request for Interest in Commercial Leasing for Wind Power Development on the Gulf of Mexico Outer Continental Shelf

Dear Director Lefton:

The National Ocean Policy Coalition (“Coalition”) is pleased to offer comments in response to the Bureau of Ocean Energy Management’s (“BOEM”) request for interest (“RFI”) in commercial leasing for wind power development on the Gulf of Mexico Outer Continental Shelf.

The Coalition is an organization of diverse interests representing sectors and entities that support the development and implementation of sound, balanced ocean policies that recognize and enhance the critical role that our oceans, coastal areas, Great Lakes, and marine and terrestrial ecosystems play in our nation’s economy, national security, culture, health, and well-being while conserving the natural resources and marine habitat of our ocean, coastal, and Great Lakes regions for current and future generations. Coalition members include interests ranging from fishing and energy to waterborne transportation that depend on ocean access to provide the nation with economic and societal benefits.

Although the Coalition is not providing comments specific to the identification of specific acreage for leasing consideration or site conditions, resources, and multiple uses in close proximity to or within the RFI area, the Coalition is pleased to highlight the following principles for ocean development siting that can help support more collaborative and effective decisions for any proposed use of ocean space, including potential future wind leasing in the Western and Central Gulf of Mexico:

- State and Federal policies should encourage efforts to identify, explore, and evaluate ocean, coastal, and Great Lakes areas of potential resource use and opportunity
- Impact assessments of proposed development projects should be based on the best available scientific and economic data and evidence, with analysis reasonably limited to project-specific spatial and temporal boundaries
- Consistent with applicable law, siting decisions should account for competing uses and be informed by cost-benefit analysis including economics, safety, and environmental factors
- When evaluating proposed uses of shared marine space, coordination should occur with adjacent coastal states to gain support and inform siting decisions, and other current and potential ocean users should be identified and engaged in a manner that affords them an opportunity to provide meaningful input



- Where a siting decision results in loss of existing economic activity for other marine users, displaced users should be fairly compensated for economic losses
- Where more than one coastal state is affected by a proposed project, an incentive-driven collaborative process under existing statutory authority should facilitate regional dialogue among the public and private sectors on how siting should proceed, including through existing entities such as regional ocean partnerships and intergovernmental renewable energy task forces
- Existing entities with statutory decision-making authority that includes siting of activities, such as regional fishery management councils, should be given deference for siting and access decisions affecting activities under their jurisdiction

From jobs, food, and energy to transportation, tourism, and beyond, Americans across the country depend on access to the ocean and its natural resources. For the Gulf of Mexico region, successful multiple-use management, coexistence among various ocean-based activities, inclusive, holistic collaboration among stakeholders, and strong partnerships achieved through groups including the Gulf of Mexico Alliance have been hallmarks of user groups' experience to date. Implementation of the above-listed siting principles will help ensure continued success and support decision-making at federal agencies including BOEM that is science-based, transparent, and balanced.

With the U.S. marine economy accounting for 2.4 million jobs and \$397 billion in Gross Domestic Product based on the most recent Commerce Department report,¹ the oceans, coasts, and Great Lakes are essential to the social and economic well-being of the United States. For that reason, the Coalition encourages BOEM and all federal agencies to use the principles identified above as a guidepost when making decisions regarding access to and use of the nation's marine resources.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Belcher", is placed over a light gray rectangular background.

Jack Belcher
Managing Director

¹ https://www.bea.gov/sites/default/files/2021-06/mesa0621_0_0.pdf