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July 30, 2018

Luke Feinberg
BOEM, Office of Renewable Energy Programs
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Sterling, Virginia 20166
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RE: Bureau of Ocean Energy Management [Docket No. BOEM-2018-0004]
Commercial Leasing for Wind Power on the Outer Continental Shelf in the New York Bight—Call for Information and Nominations

Dear Mr. Feinberg,
EDF Renewables Development, Inc., Company # 15027 (EDFR Offshore), respectfully submits this response to BOEM Docket number 2018-0004 regarding our interest in future offshore wind lease areas on the Outer Continental Shelf (OCS) in the New York Bight.

EDFR Offshore applauds BOEM for the considerable effort expended in holding this Call and appreciates the opportunity to submit comments. As part of our efforts to review the areas, we have worked with the New York State Energy Research and Development Authority (NYSERDA) in their efforts to study the suitability for offshore wind in the New York Bight. We support the extensive scientific study and outreach involved in the New York State Offshore Master Plan.

While we believe all areas in the New York Bight are buildable, EDFR Offshore prefers areas that will have less impact on the commercial fishing industry while balancing the need to maximize energy production. We request that even though potential lessees cannot express interest in the entire area, that BOEM make a determination of competitive interest using 43 U.S.C. 1337(p)(3) for any lease blocks in the New York Bight. EDFR Offshore is not giving up our right to compete in any area in the New York Bight and would prefer that BOEM does not proceed with the noncompetitive lease process pursuant to 30 CFR 585.232 for any part of the Call Area.

We request that BOEM determines there is competitive interest for any selected areas of the Call Area and proceed with Area ID, as set forth in 30 CFR 585.211(b), and utilized the competitive leasing process as set forth under 30 CFR 585.211 through 585.225.

EDFR Offshore offers feedback on the following items in the Call:



Commercial Fishing

As outlined in the Call for Information, "BOEM recognizes that several commercial and recreational fisheries operate in the Call Areas, including, but not limited to: Butterfish, Atlantic mackerel, Atlantic sea scallop, Atlantic surfclam and ocean quahog, longfin and Illex squid, monkfish, Northeast multispecies, summer flounder, scup, and black sea bass fisheries." EDFR Offshore has begun outreach to commercial fishing groups, including the Responsible Offshore Development Alliance (RODA). It is clear that portions of Hudson South are less likely to impact commercial fishing than other areas in the NY Bight and EDFR Offshore has focused most of our initial study effort in this area.

Bathymetric Conditions

Due to continued technical improvements and advances in construction techniques, there is no reason to limit projects to 60m water depth on the Atlantic coast. EDFR Offshore's parent company, EDF EN, is currently developing and deploying floating foundations in depths of 90-100m. Depth should not be a factor as BOEM selects future lease areas. While much of the NY Bight is 60m or shallower, future lease areas should include deeper location options.

Visual Impacts

Previous offshore wind viewshed analyses have often overstated the number of wind turbines on the western edge of Atlantic projects. In addition, recent night time simulations do not account for changes in lighting technology that drastically reduce the amount and intensity of lights, while still preserving safety for mariners and pilots. Viewshed should not be a key factor in determining lease areas.

Area of Interest

BOEM has selected a large area to study that includes 222 whole OCS blocks and 172 partial blocks in total, and comprises approximately 2,047 square nmi (702,192 hectares). In public meetings, EDFR Offshore staff have seen concern that this entire area will be leased and led to undue confusion. As BOEM's efforts continue, care should be made to ensure that all stakeholders understand that the study areas in the NY Bight are not the final lease areas. The offshore wind lease areas will comprise a significantly smaller portion of this total area.

As stated earlier, EDFR Offshore is interested in leasing any future sites in the New York Bight, but our preference is for areas on the western side of Call Area Hudson South. Our selected area is based on a review of NMFS maps, conversations with RODA, and our internal technical review. Our initial interest is in approximately 90,000 acres shown in the attached map and with focus on the following lease blocks. This is slightly above what BOEM requested due to some of the aliquots on the edge. We have also included a map showing a larger area that we feel is suitable for additional lease areas with less fishing impact than other portions of the NY Bight.



As our work with RODA and other groups continue, we may seek to refine our preferred lease area further. This are the blocks in our initial area of interest.

PROT Number	BLOCK Number	BLOCK Label	SUB Block	Acres	AREA Name	PROT Name
NJ18-03	6105C	6105	C	356	Hudson South	Hudson Canyon
NJ18-03	6105D	6105	D	356	Hudson South	Hudson Canyon
NJ18-03	6105G	6105	G	356	Hudson South	Hudson Canyon
NJ18-03	6105H	6105	H	356	Hudson South	Hudson Canyon
NJ18-03	6105L	6105	L	356	Hudson South	Hudson Canyon
NJ18-03	6105P	6105	P	356	Hudson South	Hudson Canyon
NJ18-03	6106	6106		5693	Hudson South	Hudson Canyon
NJ18-03	6155D	6155	D	356	Hudson South	Hudson Canyon
NJ18-03	6155H	6155	H	356	Hudson South	Hudson Canyon
NJ18-03	6155L	6155	L	356	Hudson South	Hudson Canyon
NJ18-03	6156	6156		5693	Hudson South	Hudson Canyon
NJ18-03	6206	6206		5693	Hudson South	Hudson Canyon
NJ18-03	6207	6207		5693	Hudson South	Hudson Canyon
NJ18-03	6256	6256		5693	Hudson South	Hudson Canyon
NJ18-03	6257	6257		5693	Hudson South	Hudson Canyon
NJ18-03	6258	6258		5693	Hudson South	Hudson Canyon
NJ18-03	6259	6259		5693	Hudson South	Hudson Canyon
NJ18-03	6306	6306		5693	Hudson South	Hudson Canyon
NJ18-03	6307	6307		5693	Hudson South	Hudson Canyon
NJ18-03	6308	6308		5693	Hudson South	Hudson Canyon
NJ18-03	6309	6309		5693	Hudson South	Hudson Canyon
NJ18-03	6355D	6355	D	356	Hudson South	Hudson Canyon
NJ18-03	6355H	6355	H	356	Hudson South	Hudson Canyon
NJ18-03	6355L	6355	L	356	Hudson South	Hudson Canyon
NJ18-03	6355P	6355	P	356	Hudson South	Hudson Canyon
NJ18-03	6356	6356		5693	Hudson South	Hudson Canyon
NJ18-03	6357	6357		5693	Hudson South	Hudson Canyon
NJ18-03	6358	6358		5693	Hudson South	Hudson Canyon

Requested Information from Interested or Affected Parties

General: BOEM has requested specific and detailed comments from the public and other interested or affected parties regarding a number of key items: geological, historic properties, and visibility. EDF



Offshore suggests that all these items should be included in the design review and not included in the Call process.

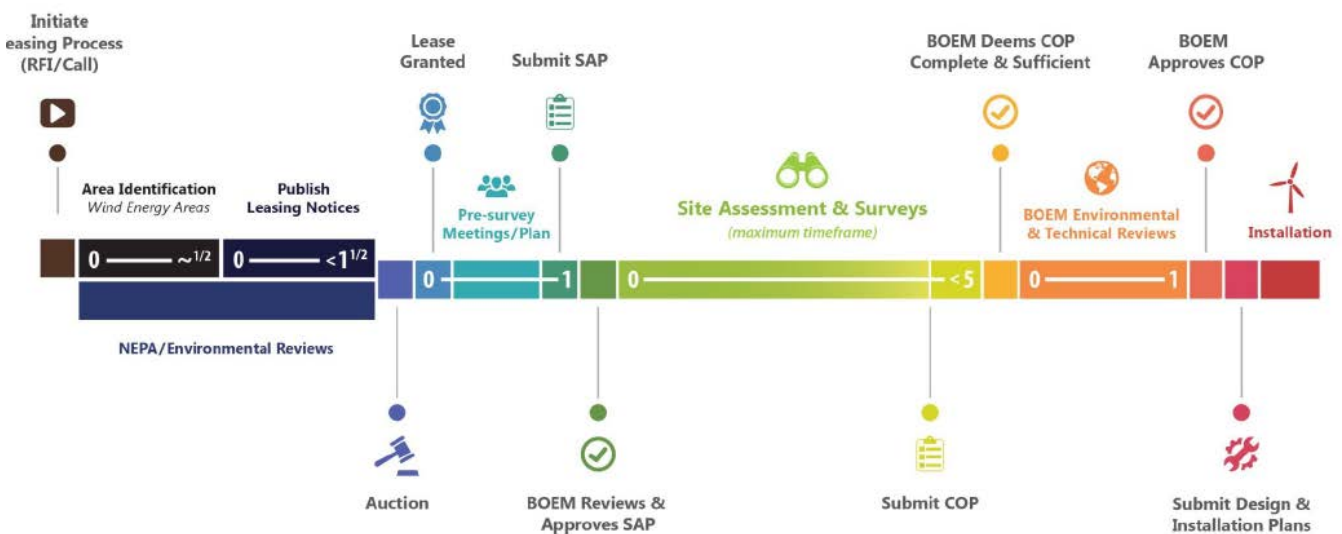
Buffers Between Lease Areas: Within the *Area for Consideration* document, the State of New York also included “indicative areas” intended to provide a sense of scale and outline what potential WEAs could look like. The indicative areas were drawn with buffers between the leases, as seen in Europe. BOEM should be aware that buffers are desirable, but buffer sizes will depend on the orientation of the project areas based on predominant wind direction. EDFR Offshore suggests that one option is to propose slightly larger lease areas at the next step of the leasing process, so the buffers can be discussed in a more defined scope.

Size and Number of WEAs: EDFR Offshore supports new lease areas that are generally the same size or larger than the other NY offshore lease areas and supports the State of New York request for four areas.

Required Nomination Information

Objectives: EDFR Offshore seeks to lease a portion of the NY Bight for Offshore Wind

Proposed Schedule: EDFR Offshore expects to follow the BOEM timeline outlined in previous BOEM presentations (graphic below). As part of our efforts EDFR Offshore has begun our own analysis of site conditions and wind resource, environmental studies, wind turbine suitability, foundation design, port review, interconnection study, and operations & maintenance efforts.





Pertinent Data: For the site review, EDFR Offshore reviewed NMFS maps that were submitted as part of this Call along with data sets from the NYSERDA offshore wind process.

Legal Qualification: Previously submitted, qualified

Technical and Financial Qualifications: Previously submitted, qualified

Thank you again for the opportunity to respond. We appreciate the effort of you and the staff at BOEM to support a robust offshore wind industry.

Sincerely,

A handwritten signature in black ink that reads "Doug Copeland". The signature is written in a cursive style.

Doug Copeland

EDF Renewables Development, Inc.

Submitted via electronic copy at [http:// www.regulations.gov](http://www.regulations.gov)