



COMMONWEALTH of VIRGINIA

Office of the Governor

P.O. Box 1475
Richmond, Virginia 23218

June 27, 2022

Bridgette Duplantis
Office of Leasing and Plans
Bureau of Energy Ocean Management (BOEM)
1201 Elmwood Boulevard
New Orleans, Louisiana, 70123

Re: Commonwealth of Virginia Comments on BOEM Commercial Leasing for Wind Power Development on the Central Atlantic Outer Continental Shelf

Dear Ms. Duplantis,

The Commonwealth is already a leader in the offshore wind industry, and the Youngkin Administration is focused on the economic development opportunities presented by this emerging sector in a way that is consistent with a common sense energy policy that promotes jobs for Virginia and its right-to-work philosophy. We are working to ensure that any offshore wind development is economically beneficial to the Commonwealth and developed in a manner that maximizes job creation and investment in Virginia, as well as balancing the critical interests of established maritime industries, the defense sector, and the natural environment.

The Governor supports and is fully committed to Virginia's current offshore wind development, and we believe offshore wind has an important role in Virginia's development of a diversified and common sense energy portfolio. The Commonwealth will continue to support any future offshore wind development that meets Virginia's economic needs and protects ratepayers from high energy costs.

BOEM's Central Atlantic Call Area includes critical areas off Virginia's coast and any future leasing or development of parts the Call Area must balance the competing interests of all stakeholders. The Commonwealth is home to a variety of these stakeholders who understand and value the opportunities with any future development, but also recognize the need to ensure other critical services, industries, and infrastructure are also considered at the local to regional scale.

For example, the commercial maritime industry, which comprises over ten percent of the Commonwealth's gross domestic product, relies on safe and reliable navigation fairways.

Virginia's ports and waterways are among the most nationally and economically significant in the United States. While supportive of the growth of the offshore wind industry and the opportunities for the Commonwealth to provide critical support to the offshore wind industry supply chain and become a key hub for future development, we must ensure any future leasing areas do not detrimentally impact or restrict maritime commerce or commercial navigation within the federal channels into the Chesapeake Bay, Hampton Roads, The Port of Virginia's facilities, Chesapeake Bay anchorages, the Atlantic Ocean shipping lanes and its port approaches as well as traditional and projected high-density maritime traffic routes.

Additionally, while the Commonwealth continues to work with BOEM to ensure the recognition and understanding of impacts to commercial and recreational fisheries in the Call Area, further understanding of these relationships will allow for informed decisions to avoid and minimize impacts to fisheries. While there is recognition that recreational fisheries could benefit from the habitat provided by future development, large portions of the Call Area do not currently reflect the potential millions of dollars of negative impact to Virginia's commercial fishing industries. Ensuring avoidance and minimization of impacts before considering mitigation is critical to the foundation for future offshore wind development for Virginia.

There are many other considerations that are critical such as the Commonwealth's growing state and national space and military operations that require unimpeded navigation and radar, the expansive tourism industry throughout the Hampton Roads and Virginia Beach areas, and critical natural heritage resources within the Call Area and throughout Virginia's coast where potential transmission line landing sites could be required.

In addition to balancing the interests of other key stakeholders, it is still vital that Virginia's ratepayers be protected from high energy costs and the amount of the Call Area necessary for offshore wind energy should reflect its appropriate role in a diversified and common sense energy portfolio. We recognize that development costs associated with the emerging industry are a risk, and unchecked costs are also likely to prove counterproductive to further development of the industry. Any offshore wind development within the Call Area would also need to consider interconnection into the Commonwealth and the role it plays in the reliability of our energy transmission infrastructure.

We appreciate the consideration and incorporation by BOEM of previous input, but further collaboration and coordination between the Commonwealth, BOEM, other states, and key stakeholders in Virginia during every step in this process moving forward will allow for a final Call Area and lease conditions that optimize the offshore wind development opportunities.

In addition to previously submitted comments by the Commonwealth and our key agencies and partners, we encourage consideration of detailed comments by several Commonwealth agencies and departments as BOEM identifies final areas for leasing and development. Doing this will ensure that the Commonwealth continues to be a leader in the offshore wind industry, and will ensure that any offshore wind development is part of a common sense energy policy that is economically beneficial to the Commonwealth and developed in a manner that maximizes job creation and investment in Virginia, as well as balancing the critical interests.

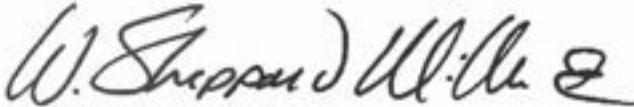
Sincerely,

A handwritten signature in blue ink that reads "Travis Voyles".

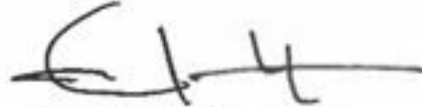
Travis Voyles
Acting Secretary of Natural and Historic
Resources

A handwritten signature in blue ink that reads "Caren Merrick".

Caren Merrick
Secretary of Commerce and Trade

A handwritten signature in black ink that reads "W. Sheppard Miller III".

W. Sheppard Miller III
Secretary of Transportation

A handwritten signature in black ink that reads "Craig Crenshaw".

Craig Crenshaw
Secretary of Veterans and Defense Affairs

A handwritten signature in blue ink that reads "George 'Bryan' Slater".

George "Bryan" Slater
Secretary of Labor