APPENDIX A
Summary of Major Preliminary WEA Comments

COMMENTS ON THE PRELIMINARY WEAs

On November 16, 2022, BOEM announced the eight draft WEAs for the GOM on regulations.gov. The comment period for the Draft WEAs closed on December 16, 2022. BOEM received 67 comments from Federal and State agencies, interest groups, industry, and the general public. Each comment was read and categorized according to its source and the nature of the information included. Of the 67 comments received, 22 presented substantive issues. All comments that were relevant to the modification of size or location of the Draft WEAs were considered in the preparation of the Final WEAs. A summary of all substantive comments received follows.

Virginia Maritime Association

- Consolidated PARS should be unimpeded.
- Additional areas in the southwest portion of Call Area "B2" and the northwest portion of Call Area "D" are under active consideration for anchorages and it may become necessary to reduce their size.
- The presence of several transatlantic subsea telecommunication cables may require further Draft WEA "D" reductions.
- Requests the removal of blocks 6025A, 7125M, and 7125N of Call Area "B1" which now impede the proposed Cape Charles to Delaware Bay Fairway.

Fish and Wildlife Service

- Additional research is needed to determine the extent of risk to Bermuda petrel, particularly in WEAs D, E1, E2, and F.
- Concerns for potential impacts to marine diving birds for areas C and D. They recommend that the surveys be conducted in those areas to better characterize use.
- The Service also encourages BOME to utilize the South Atlantic Conservation Blueprint (available online at https://www.southatlanticlcc.org/blueprint/)

International Black-capped Petrel Conservation Group

- At least seven geospatial datasets on Black-capped Petrel are available for the CAOCS, pertaining to at-sea observation records, individual-based tracking, and habitat modeling based on at-sea observation records.
- At a minimum, we suggest that BOEM justifies any prioritization in its use of datasets in the Ocean Planning Model.

Blue Water Fisherman's Association

- Requests the removal of the northwest corner of draft WEA E1.

RWE Renewables

- RWE urges BOEM to include both the primary and secondary areas in Call Area "A" in the final WEA.
- RWE urges BOEM work with USCG to achieve a balanced approach to draft

fairways in WEA B1.

- Suggest model refinement.

North Carolina Department of Commerce

- Governor Roy Cooper has a goal of developing 8GW by 2040.
- Fishermen have indicated that a commercial ocean gill net fishery occurs in Call Area D targeting Atlantic croaker and Atlantic cutlassfish (ribbonfish) and there is also a commercial trawl fishery that targets shortfin squid in this area.
- NEFCS surfclam survey data (2008-2019) indicates the presence of surfclams in Call Area D.
- Review information from Kitty Hawk Wind Energy Area Fisheries Liaison to better understand the fisheries that are transiting and operating in the call areas to mitigate the impacts to these existing fisheries.

Maryland Energy Administration

- Maryland requests three to five lease areas that can each accommodate between 1,000 to 2,000 MW of capacity (up to 10,000 MW total).
- The reduction in proposed lease areas will have substantial dampening effects on the ability of the available lease areas of Maryland's coast.
- The fragmented WEAs within Call A and B are of significant financial risk; it is desirable to have significant areas of Call Area E for future floating technologies.
- The OSW potential in areas adjacent to Maryland state waters is disproportionately affected compared to other states by the consolidated PARS.
- Vessels and fisherman that participate in tournaments that target Highly Migratory Species (HMS) in and around Poorman's and the Washington Canyons are competitive based upon a vessel's ability to quickly get to the canyons, fish, and return to port quickly. Modeling: The "Highly Migratory Species (HMS) Essential Fish Habitat (EFH) Overfished/Prohibited Sharks Count" layer would benefit from having a companion table listing the species by Call Area.

Hexicon USA

- Identifying larger Wind Energy Areas in the floating areas will be key to meet East Coast renewable energy goals. Floating Wind Energy Areas encompass lower areas of conflict and expanding these areas will help spur supply chain and R&D Investment.
- In terms of depth, exceeding 2,500 m, the Central Atlantic call areas E and F present significant, but not insurmountable challenges.

American Clean Power / MAREC

- Rerun the model after DoD input.
- Base safety fairways on the supplemental ACPARS.

- Models issues, which are weighting more heavily on the commercial developability sub-model of the area for wind energy.
- Keep area E and expand Area F.
- BOEM should aim to issue 10 leases of 100,000 acres each within call areas A-D.

RODA

- Concerns about data layers in model.

Garden State Seafood Association

- BOEM should ensure that the release of the drafts provides a meaningful opportunity to be flexible in response to comments.
- BOEM should show how they determined the model scores, what thresholds were used, and if external experts were consulted.
- Listed concerns about specific data layers used.

Audubon Society and ABC

- Areas E and F could put six species of Pterodroma petrel in peril.

National Wildlife Federation and NRDC

- Evaluate missing data for protected species before Final WEA determination.
- BOEM does not provide information on why the agency thought these areas were appropriate for development.

Fisheries Survival Fund

- Systems found that the cumulative impacts of offshore wind arrays on the local maritime ecosystem are far more pervasive than previously understood.

VMRC

- Slow the leasing process to allow more time to study foodweb interactions and hydrodynamic effects on larvae.
- WEA model does not equally weigh commercial fishing use.
- Model needs DoD input as well as non-federally managed fish data.
- Recommend avoiding all of Areas A (scallop and surfcalm summer flounder and black sea bass, B (dredge fishery, pot and trap, gill net and trawl), and C (surf clam, pt, and squid/butterfish/mackerel trawling) because of high fisheries interactions.
- High economic fisheries exposure risk from wind development for small coastal communities.

NMFS

- Constrain or heavily weight Frank Lautenberg area, remove E-1 and E-2.
- Add charter logbook data to model through 2020 (NMFS provided).
- Re-run model across all WEAs not just A-D and E-F separately.

Seafreeze Ltd.

- Remove areas E and F due to Frank Lautenberg overlap.
- Illex squid fishery is a high tonnage fishery with a small number of participating vessels, so model downplays its significance.

Chesapeake Climate Action Network

- Designate ten offshore wind leases of at least 80,000 – 90,000 acres each.
- WEAs A, B1, and B2 are particularly important to Maryland.

Delaware Department of Natural Resources and Environmental Control

- The state has an interest in Draft WEA-A as the site, most economically feasible and most likely to accommodate possible future offshore wind development that could interconnect into and serve Delaware.
- Concerned about corals in areas E and F.

Ocean Winds

- Keep primary and secondary areas in A-D.
- Does not encourage BOEM to maintain WEAs in the deeper portion of the Central Atlantic OCS, as it could potentially host demonstration projects to prove viability of ultra-deep conditions (1,300m+).
- Requests that BOEM revisits WEA B1 as the CPA-PARS process continues and assesses the feasibility of increasing acreage in coordination with USGS.

NOAA-NOS

- Requests the Eastern Regional Office of our Office of National Marine Sanctuaries be included in BOEM's Central Atlantic Intergovernmental Task Force.
- Propose additional archeological surveys in those identified WEAs.
- In addition, we request that BOEM take into account the need to mitigate the wind turbine interference (WTI) that any offshore wind energy project would cause to the oceanographic high-frequency (HF) radars in the region due to the implications to maritime safety, navigation, U.S. Coast Guard search-and-rescue, weather forecasting, and other applications.
- BOEM require WEA Lessees to develop a mitigation plan, to be reviewed and coordinated with the U.S. Integrated Ocean Observing System (IOOS) Surface Currents Program.
- The ROC would like to ensure analyses can be conducted on the project area(s) or proposed wind turbine locations as soon as practical to capture any potential beam interference issues which could create data contamination to any of the Tri-Agency NEXRAD WSR-88D or TDWR radars.

USCG

- The secondary WEA-A lease aliquots conflict with proposed fairways and require further negotiation to support additional leasing without compromising safety of navigation.

- When evaluating coastwise routes between Chesapeake Bay and New York across the busy entrance to the Delaware Bay, the Coast Guard received information and comments from multiple waterway users in support of our proposed fairways. Reconciling them with prospective leases in Area A is our highest immediate priority.
- The Coast Guard supports leasing in all other proposed WEAs.

NPS

- We suggest that BOEM include proximity to National Park System units and similar protected areas as well as proximity to National Register-listed properties, in particular, National Historic Landmarks, as a factor in the development of the final Central Atlantic WEAs and for similar future planning efforts in support of offshore wind energy leasing.
- Leasing for wind power development in Call Area D potentially extends construction and operations being planned at the Kitty Hawk Lease Area and would add to and intensify impacts currently expected to visual resources at Cape Hatteras National Seashore and Wright Brothers National Monument, migratory birds, fisheries, and may lead to increased marine debris that could affect Cape Hatteras or Cape Lookout National Seashores.
- NPS would prefer leasing and development not occur in Offshore Block D, particularly its southern end, which would have the greatest potential for impact on visual resources at Cape Hatteras and Wright Brothers. Increasing the distance from shore in this area could avoid or mitigate those visual impacts.
- NPS is interested in understanding the potential impacts for various turbine heights and layouts, and also potential impacts at night due to night lighting of the turbines under FAA requirements as areas are developed. The NPS has also found video simulations during daylight, dusk and nighttime hours particularly useful in assessing potential impacts. We hope that BOEM and / or the eventual developers will create these video simulations in addition to static photo representations. NPS has concerns about potential impacts to nesting shorebirds and migratory birds, particularly rare and endangered species that make their way up and down the Atlantic flyway and stop at National Seashores to nest, forage, and rest. Assateague Island NS, Cape Hatteras NS, and Cape Lookout NS provide important stopover and breeding sites for federally listed and migratory bird species, including piping plovers (*Charadrius melodus*), rufa red knots (*Calidris canutus rufa*), and Wilson's plovers (*Charadrius wilsonia*).