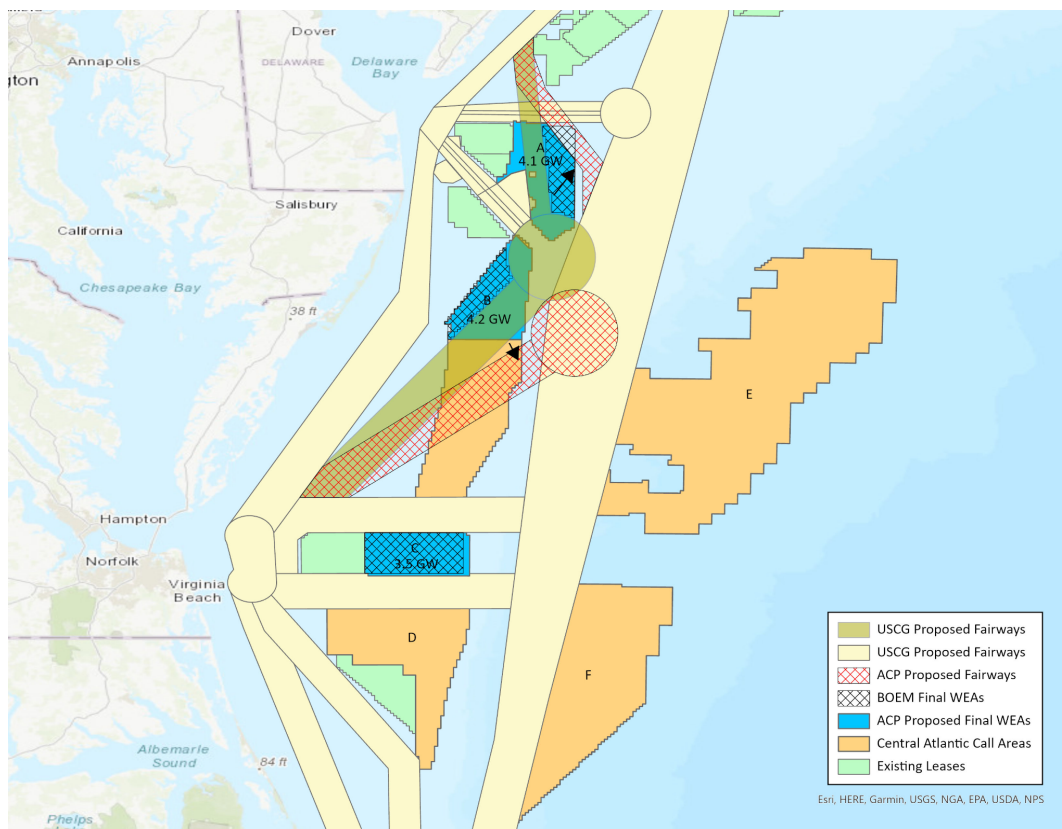


Liz Klein, Director
Bureau of Ocean Energy Management
Environment Branch for Renewable Energy
45600 Woodland Road, Mail Stop VAM-OREP
Sterling, VA 20166

Re: Docket No. BOEM–2023–0034, Notice of Intent To Prepare an Environmental Assessment for Commercial Wind Lease Issuance and Site Assessment Activities on the Atlantic Outer Continental Shelf Offshore Delaware, Maryland, and Virginia

Director Klein,

Collectively, we represent labor unions, offshore wind developers, justice organizations, and climate organizations. Building at least 8.5 gigawatts of offshore wind energy for Maryland is a priority for all of us. That is why we urge you to adjust the Central Atlantic lease area maps to make room for more offshore wind while still accommodating the needs of all other ocean users. The map below shows a solution that would lease an additional 300,000 acres of ocean space for offshore wind while not putting any turbines in the area the Department of Defense has deemed worthy of further study and while not diminishing the number or width of coast guard fairways. We urge BOEM to adopt this map.



BOEM estimates that, as currently proposed, the new Central Atlantic lease areas would accommodate between 4 and 8 gigawatts of offshore wind. Even taking the upper estimate of this range, the lease areas cannot accommodate the offshore wind needed in this region. Virginia is required by law to build 5.2 gigawatts of offshore wind. North Carolina must build 8 gigawatts of offshore wind, and Maryland just passed a law to build 8.5 gigawatts. Some of that energy can come from existing lease areas, but to meet those targets set in law, those three states need more than 11 gigawatts of offshore wind in the new lease areas. On top of that, Delaware is also reliant on the Central Atlantic for its offshore wind energy, and while it is not currently building any, it is expected to pass its first offshore wind legislation in 2024.

Offshore wind is vital to our future. It holds the promise of affordable, clean energy that creates hundreds of good union jobs and reduces air pollution. Limiting offshore wind comes with costs. It means fewer jobs, worse pollution, and a less affordable and reliable transition to a clean energy economy. While there are other ocean users whose needs must be accommodated, we are proposing a win-win solution that would nearly double the acreage available for offshore wind in the Central Atlantic while not reducing the width or number of Coast Guards fairways and while not encroaching on ocean space conflicted with the U.S. Navy, U.S. Air Force, or the National Aeronautics and Space Administration (NASA).

We hope BOEM will expand the space available for offshore wind in the Central Atlantic by adopting the map shown above.

Signed,

- Advanced Energy United
- Audubon Mid-Atlantic
- Baltimore-DC Metro Building and Construction Trades Council
- Business Network for Offshore Wind
- CASA
- Chesapeake Climate Action Network
- Climate Law & Policy Project
- Climate Reality Greater Maryland
- Elders Climate Action Maryland
- Environmental Justice Ministry Cedar Lane Unitarian Universalist Church
- IBEW Local Union 24
- Indivisible Howard County
- Interfaith Partners for the Chesapeake
- Ironworkers Mid-Atlantic States District Council
- MAREC Action
- Maryland LCV
- Maryland Legislative Coalition
- MLC Climate Justice Wing
- NAACP Maryland State Conference, Environmental and Climate Justice Committee
- Strum Contracting Company Inc.
- Unitarian Universalist Environmental Justice Ministry
- United Steelworkers District 8