



Maryland
Energy
Administration

Wes Moore, Governor
Aruna Miller, Lt. Governor
Paul G. Pinsky, Director

May 18, 2023

U.S. Coast Guard
Department of Homeland Security
Attn: John Stone
Office of Navigation Standards
US Coast Guard Stop 7318
2703 Martin Luther King Jr Ave SE
Washington, DC 20593-7318

RE: 10 March Notice - Consolidated Port Approaches and International Entry and Departure Transit Areas Port Access Route Studies Integral to Efficiency of Possible Atlantic Coast Fairways (Federal Register Number 88 FR 15055)

Dear Mr. Stone:

The State of Maryland would like to express its concerns with the US Coast Guard's (USCG) Consolidated Port Approaches and International Entry and Departure Transit Areas Port Access Route Studies (CPAPARS) Integral to Efficiency of Possible Atlantic Coast Fairways (Federal Register Number 88 FR 15055). The USCG's new consolidated port approaches appear to be a significant departure from past established Delaware Bay transportation separation schemes and spacing requirements that the US Coast Guard has discussed over the last decade. While the state understands the challenges associated with establishing fairways that mitigate the conflicted use of sea space, the state is concerned about the impact of these fairways with both approved and future offshore wind development projects in the Central Atlantic. The CPAPARS routes in the consolidated route approach directly impact existing offshore wind lease areas, and would prevent Maryland from realizing additional future offshore wind development in Call Areas A and B under review through the Bureau of Ocean Energy Management's (BOEM) Central Atlantic Intergovernmental Task Force, the areas most viable for near term offshore wind development.

Offshore wind holds the largest renewable energy resource for Maryland, making it vital for Maryland to achieve its goal of 100 percent clean energy by 2035, and statutory goals of a 60 percent reduction in GHG emissions by 2031 and net zero economy by 2045. If enacted, the new

routes would present significant barriers for meeting state and federal clean energy, emissions reduction, and climate change goals.

Importance of Offshore Wind Development in Maryland

Offshore wind is an essential renewable energy source to reach Maryland and the greater United State's decarbonization goals and mitigate the risks of climate change. Maryland has been a leader in offshore wind development since 2013 with the establishment of the Maryland Offshore Wind Energy Act of 2013 which led to the approval of 2.2 GW of offshore wind projects, enough energy capacity to power 600,000 homes. Since 2013, Maryland has maintained its position as a clean energy leader by investing in the steps needed to achieve a net zero economy by 2045. These investments include the development of a sustainable clean energy market, supply chain, and workforce. The immense power generation potential of offshore wind makes it a vital renewable energy resource for Maryland to achieve its goals. The importance of offshore wind for Maryland's clean energy economy is so essential the state formally requested BOEM to initiate the Central Atlantic lease process in 2021 and quadrupled its offshore wind energy goals to 8.5 GW through the POWER Act of 2023.¹

Quadrupling the state's offshore wind goal further promotes the state's transition and investments into Maryland's growing clean energy economy. To maximize the economic benefits of the offshore wind industry, Maryland has been investing in establishing a sustainable offshore wind market and de-risking that market through research, vocational training, business incentive programs, and stakeholder engagement with multiple industries. Maryland's central location on the east coast holds the potential for industry collaboration across neighboring states and the Mid-Atlantic region, making Maryland an essential location for businesses to invest in their own industry growth. However, the impact of the CPARPARS fairways on the development of offshore wind leasing areas off Maryland's coast increases the risks for businesses and developers who are looking towards Maryland for their future investments. The uncertainty in understanding the viability of the offshore wind lease areas and the complications associated with having large fairways on either side of the wind energy areas poses high economic risk to Maryland's energy investors.

Impacts to Ongoing Offshore Wind Siting

Understanding the importance of offshore wind's economic and clean energy benefits to Maryland, in November, 2021, the Maryland Energy Administration formally requested BOEM to initiate regionally focused offshore wind leasing in the Mid-Atlantic by reconvening the Intergovernmental Renewable Energy Task Force (Task Force) for Maryland. MEA requested three to five new commercial lease areas, each able to accommodate 1,000 - 2,000 MW of offshore wind capacity, and three additional lease areas specifically for research and development purposes. As a result of Maryland's formal request, BOEM reconvened the Intergovernmental Renewable Energy Task

¹ 2023 MD Laws, Chap. 95

Force and on April 29, 2022 and published a Call for Information and Nomination for six areas in the Central Atlantic, comprising 3.9 million acres. To meet Maryland's requested lease areas, which under Maryland statute are required to interconnect on the Delmarva Peninsula, lease areas within Call Areas A, B, and E are of utmost importance to the state. The CPAPARS fairways significantly overlap with Call Areas A and B, limiting offshore wind development in the areas suitable for fixed bottom technologies. Fixed bottom offshore wind is the most practical technology to continue near-term offshore wind development for the state. While potential lease areas in Call Area E are of interest to Maryland, the deeper water depths of those areas require floating offshore wind technologies, which are still in development, making offshore wind development in Call Area E an interest for reaching long-term offshore wind goals as technology continues to advance. For these reasons, Maryland is concerned about its ability to achieve its net zero economy by 2045, a goal that heavily relies on the state's 8.5 GW of offshore wind in near shore lease areas – a goal which strongly aligns with, and contributes to, the Biden Administration's national goal for offshore wind of 30 GW by 2030.

Should you have any questions, please do not hesitate to contact Catherine McCall, Director, Office of Coastal and Ocean Management, Chesapeake and Coastal Service at the Department of Natural Resources via email (catherine.mccall@maryland.gov) or phone (410-510-9527) and Samuel Beirne, Energy Program Team Lead - Wind & Water Programs at MEA via email (samuel.beirne@maryland.gov) or phone (410-913-5793).

Sincerely,

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Paul Pinsky

Director

Maryland Energy Administration

DocuSigned by:

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Kevin Anderson

Secretary

Maryland Department of Commerce

Sincerely,

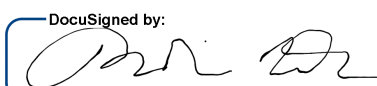
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Josh Kurtz

Secretary

Maryland Department of Natural Resources

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Portia Wu

Secretary

Maryland Department of Labor