Mr. Casey Reeves
Renewable Energy Program Specialist
Bureau of Ocean Energy Management,
Office of Renewable Energy Programs
381 Elden Street, HM–1328
Herndon, Virginia 20170

Subject: Notice of Intent to Prepare an Environmental Assessment for Proposed Wind Energy-Related Research Activities on the Atlantic Outer Continental Shelf Offshore Virginia and Notice of Public Scoping Meeting. [Docket No. BOEM–2014–0009]

Dear Mr. Reeves:

The Virginia Offshore Wind Development Authority (VOWDA) was created by 2010 legislation with a mission to facilitate, coordinate, and support development of the Virginia offshore wind energy industry, offshore wind energy projects, and supply chain vendors. VOWDA achieves this mission by:

- Supporting the collection of metocean and environmental data.
- Identifying regulatory and administrative barriers.
- Working with local, state, and federal government agencies to upgrade port and logistic facilities and sites.
- Ensuring development is compatible with other ocean uses and avian/marine wildlife.
- Recommending ways to encourage and expedite offshore wind industry development.

VOWDA supports the research project as an essential step for eventual construction and operation of Virginia’s offshore wind energy industry and encourages appropriate and efficient regulatory oversight. VOWDA is mindful of the considerable environmental survey work already performed by the Virginia Offshore Wind Technology Advancement Project (VOWTAP) team and the sustained efforts that the Virginia Department of Mines, Minerals and Energy (DMME) has made to ensure minimal conflict with existing ocean uses. The location of Research Lease Number 2 (RL2) has been thoroughly vetted and is supported by many ocean stakeholders, including the maritime and military users of the ocean space off Virginia.

This is evident from the fact that in response to BOEM’s "Public Notice of an Unsolicited Request for an OCS Research Lease, Request for Competitive Interest, and Request for Public Comment" on July 30, 2013, no public comments were submitted by any of the maritime or military users of the ocean space around RL2.
The DMME, who is the prospective lease holder for RL2, arranged a series of meetings in January 2013 to reach consensus among the maritime stakeholders, including industry and military users, and also federal regulatory agencies having jurisdiction on Virginia’s Outer Continental Shelf, on the most suitable location of RL2. VOWDA understands that minutes from those meetings are included as Appendix C of the DMME RL 2 application submitted to BOEM on February 8, 2013.

On May 15, 2013, DMME arranged for an additional meeting that convened maritime industry representatives from the American Waterways Operators, the Port of Virginia, and the Virginia Pilot Association. The purpose of this meeting was to determine if there had been any maritime developments since January that warranted reconsideration of the RL2 location. The assembled maritime industry representatives confirmed that they had no objection to having two demonstration turbines located outside the commercial Wind Energy Area (WEA) as long as the turbines were located as close as practical to the western edge of the WEA.

A similar effort has been ongoing by the VOWTAP team and DMME to keep state and federal environmental regulatory agencies and stakeholders informed of current activities and plans for the turbine technology demonstration project.

VOWDA thanks BOEM for the opportunity to comment on the subject Environmental Assessment Notice of Intent and looks forward to continuing to work with the Bureau, the industry and developers, and the numerous other stakeholders to facilitate and accelerate the smart development of our offshore wind resources.

Sincerely,

Robert R. Matthias
Chair