



State of New Jersey

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PHILIP D. MURPHY
Governor

May 4, 2018

The Honorable Ryan Zinke
Secretary of the Interior
Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Mr. Secretary:

I am writing to request a 180-day extension of the comment period for the "Commercial Leasing for Wind Power on the Outer Continental Shelf in the New York Bight Call for Information and Nominations," published by the Bureau of Ocean Energy Management (BOEM) in the *Federal Register* on April 11, 2018 (83 Fed. Reg. 15602).

New Jersey strongly supports the development of offshore wind, as evidenced by my Executive Order No. 8, which directs the New Jersey Board of Public Utilities and the New Jersey Department of Environmental Protection to take immediate steps to promote and develop offshore wind energy, with a goal of generating 3,500 megawatts of offshore wind energy capacity for state residents by 2030. We look forward to working cooperatively with BOEM and our New York neighbors to achieve this ambitious goal.

As you know, BOEM's Call for Information requests specific and detailed information from "Interested or Affected Parties" on no less than 14 issues. To assist BOEM in identifying appropriate areas for wind energy development in the NY/NJ Bight, New Jersey needs more time to respond adequately. BOEM has moved ahead to issue this Call with the understanding that New York has developed a number of studies and conducted its own stakeholder process to identify the areas of interest to New York. However, New Jersey stakeholders have not yet been meaningfully involved in the process, including New Jersey's large and valuable commercial fishing industry.

Information from the New Jersey fishing industry is particularly critical because its main fishing grounds are in areas that New York submitted to BOEM for potential wind energy development. Two of these areas are closest to the New Jersey coast. While New Jersey believes that wind energy and the fishing industry can coexist productively, it is critical that potential conflicts from these multiple uses be identified and planned for early in the process.

BOEM's NY Bight Call requests additional information regarding recreational and commercial fisheries that operate within the Call Areas, but allots only 45 days for interested parties to provide that information. That is simply not enough time for New Jersey to conduct the extensive stakeholder outreach necessary to collect the detailed fishery location and other information that BOEM needs to conduct a responsible and credible area identification process for the areas off the New Jersey coast.

Since the start of my administration less than four months ago, we have taken significant action to demonstrate that New Jersey is serious about jump starting the development of offshore wind; however, we are only now beginning our review and stakeholder process. This is in contrast with New York, which has worked for four years to conduct studies of the offshore wind areas and spent a year conducting outreach and collecting information from its stakeholders. New York did not conduct robust information gathering from the New Jersey fishing industry or from other New Jersey stakeholders.

New Jersey previously highlighted concerns to BOEM regarding the lack of stakeholder outreach in our state in a letter dated October 13, 2017 and then again in its comments dated December 14, 2017. The letters requested that BOEM engage New Jersey-based fishing interests as extensively as was done in New York, and that these meetings take place before further development of the Call for Information. Yet BOEM scheduled only one fisheries-based meeting on the New York Bight in one location in New Jersey after the NY Bight Call was published. This minimal level of outreach and limited time frame for response from New Jersey's stakeholders are simply not adequate or equitable.

New Jersey and its fishing industry need ample time to collect and provide to BOEM more detailed information to enable BOEM to do a responsible job during the next stage of its wind energy leasing process, and specifically in "deconflicting" the multiple uses of this critical ocean area. Given that New York conducted its stakeholder outreach over the course of a year, New Jersey needs at least half of that time – 180 days — to collect and provide the critical information from the New Jersey side of the NY/NJ Bight.

Furthermore, in addition to fisheries, BOEM is requesting specific and detailed information from "Interested or Affected Parties" on 14 issues. The issues noted are significant and substantial, including No. 3, "visibility," which may directly impact New Jersey residents and New Jersey maritime interests. We do not have any visibility studies by which to evaluate this issue.

Notably, BOEM also requests information on No. 8, "general interest by a developer(s) in constructing a backbone transmission system that would transport electricity generated by wind projects located offshore in the New York Bight, including a general description of the transmission's proposed path and potential interconnection points." This issue is of concern given the implications for future New Jersey offshore wind projects as well as New Jersey

coastal resources. It is unclear how this information will be used by BOEM in this proceeding, and we respectfully ask that this be separate from the NY Bight Leases.

These leases are the first of this scale to be developed that are in proximity to: 1) two distinct Independent System Operators (ISOs); 2) one of the highest areas of congestion in the country; 3) in proximity to the largest Port on the East Coast; and 4) one of the more ecologically rich and important marine resources on earth. Again, New Jersey is just beginning its consideration concerning the nexus of these issues and appreciates the support of BOEM and NYSERDA as we weigh these matters as well as the significant opportunities the NY/NJ Bight presents.

I would like to reiterate that New Jersey strongly supports and plans to pursue the development of offshore wind energy in the Atlantic Ocean off our shores, in full cooperation with BOEM. We are also committed to ensuring that it is done in the most responsible and beneficial manner for all sectors of our economy.

Thank you in advance for your serious consideration of this important request. I would welcome the opportunity to discuss it with you, and my staff is available to provide additional information. You may contact my office at 609-777-2486.

Sincerely,



Philip D. Murphy
Governor

c : Dr. Walter Cruickshank, Acting Director, BOEM
Mr. Todd Wynn, Director of Intergovernmental and External Affairs
Mr. James Bennett, Chief, Office of Renewable Energy Programs
Mr. David MacDuffee, Chief, Projects and Coordination Branch, BOEM