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January 20, 2012

Economics Division (HM 3310)
Bureau of Ocean Energy Management
381 Elden Street - MS 4050
Herndon, Virginia 20170-4817

Re: BOEM AUCTION FORMAT INFORMATION REQUEST (AFIR), Docket #: BOEM-2011-0095

Dear Director Beaudreau:

Thank you for the opportunity to comment on the set of auction formats proposed for issuing commercial leases for renewable energy projects on the Outer Continental Shelf (OCS). The undersigned organizations strongly support the development of appropriately-sited offshore wind projects, and encourage the Bureau of Ocean Energy Management (BOEM) to move forward and finalize a process that will facilitate the swift, efficient issuance of leases in order to bring America one critical step closer to bringing this massive clean energy source ashore.

Tapping even a fraction of the available wind resource off the Atlantic Coast will help the nation move toward an energy future that will power our homes and businesses with locally-produced clean energy; while avoiding fossil fuel pollution, creating thousands of jobs, and increasing energy independence. With no offshore wind turbines spinning today, America lags far behind our competitors in utilizing this pollution free resource. It is time to start building a clean energy future for America, and a significant commitment to environmentally-responsible offshore wind energy must be an essential part of that plan.

We are pleased that BOEM is continuing to develop the process for leasing the OCS for renewable energy development. It is imperative that the final lease auction process is as efficient as possible in order to prevent unnecessary costs for offshore wind development. The process must be fair and take into account the viability of potential projects for which the leases are being sought.

We support a lease auction process that minimizes time and expense for offshore wind project developers and ensures the selection of developers who have the capacity and commitment to properly explore and develop the OCS in an environmentally-responsible manner. BOEM's auction process should reflect the reality that the offshore wind industry is in its infancy in the United States and not create any financial hurdles for developers that will lead to higher prices for offshore wind projects.

Additionally, in the interest of fairness and to prevent gaming and speculation on offshore wind leases, we strongly urge BOEM to utilize a multiple factor auction approach in order to create the most environmentally efficient process possible for standing up offshore wind projects in the Atlantic. While BOEM is responsible for issuing leases, it is the states that must commit to offshore wind energy by creating market demand, financial incentives, and other policies needed to advance offshore wind energy. It is essential that state actions regarding offshore wind development be factored into BOEM's process for issuing leases. Without such an approach, it is possible that BOEM could end up issuing a lease to one developer, when another has already successfully navigated state processes to secure a power purchase agreement or ocean renewable energy credits. This unworkable situation will only result in unnecessary and costly delays at a time when BOEM should be focused on advancing a process that can quickly and efficiently award offshore wind energy leases. In addition, BOEM should design a multiple factor auction process that credits projects that have taken steps to reduce wildlife risks and environmental impacts on the marine environment, and should incorporate such measures into their regulatory preferences.

In conclusion, we thank BOEM for your work to date to advance offshore wind energy development and strongly encourage you to consider these recommendations for the lease auction process. It is critical that America pursues offshore wind energy in an efficient and cost-effective manner, in order to ensure that we can begin to harness this important clean energy source as soon as possible.

Sincerely,

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