



Responsible Offshore Development Alliance

November 25, 2019

James Bennett, Chief
Bureau of Ocean Energy Management
Office of Renewable Energy Programs
45600 Woodland Road
VAM-OREP, Sterling, Virginia 20166

Re: Guidelines for Providing Information on Lighting and Marking of Structures Supporting Renewable Energy Development [Docket No. BOEM-2019-0071]

Dear Mr. Bennett:

The Responsible Offshore Development Alliance (RODA) Joint Industry Task Force submits the following comments regarding the Bureau of Ocean Energy Management's (BOEM) Guidelines for Providing Information on Lighting and Marking of Structures Supporting Renewable Energy Development (Notice)¹

The Responsible Offshore Development Alliance Joint Industry Task Force (hereafter referred to as the Task Force) is an industry-to-industry forum dedicated to improve communications between the commercial fishing industry and offshore wind energy developers. Developed in July 2019, the goal of the group is to provide a more structured process to explore improved and creative approaches to offshore wind project siting, design, and operations. Current members of the Joint Industry Task Force include RODA members representing Atlantic fishing communities and businesses and U.S. offshore wind energy developers: Atlantic Shores, EnBW, Equinor, Mayflower, Ørsted, and Vineyard Wind, and Avangrid Renewables.

The purpose of this letter is to underline the alignment between the commercial fishing industry and the offshore wind industry regarding the important safety issues of lighting and marking of offshore turbines and substation structures. Both industries agree that it is important and beneficial for BOEM to consider this issue and engage with the relevant agencies, namely, the Federal Aviation Administration (FAA), and U.S. Coast Guard (USCG). Further, the Task Force requests that BOEM continue to work with the FAA and the USCG on developing strong recommendations for lighting and marking on offshore turbines and also engage with the additional users of the space.

Recently, the Task Force also identified safety lighting as a priority area available for improved standards and collaborative work between the fishing and renewable energy industries. Due to its focus on topics specific to fishing and offshore wind energy interactions, the Task Force defers to recommendations from the FAA for turbine identification and lighting practices in the mid-turbine and higher levels. For lower-level lighting and marking of turbines, commercial fishermen respectfully ask to play an active role in developing recommended guidelines as they are the industry most likely to interact with offshore energy structures. Additionally, as these projects are

¹ 84 Fed. Reg. 57471 (October 25, 2019).

developed in U.S. waters, we request that BOEM be flexible and adaptive in considering improvements and new recommendations from the mariners utilizing any published guidelines.

The RODA Task Force is a well-situated forum to gather feedback from the commercial fishing industry and offshore wind developers, both of which are working towards continued risk minimization and improved safety concerning navigation in and around offshore wind structures. This effort will require coordination with BOEM and the USCG to ensure the best possible knowledge and evidence is brought to bear in the development of standards and best practices for minimizing navigational safety risks.

The Task Force recently identified a range of navigational aids that the group will continue to discuss with the goal of developing consensus recommendations at future meetings. Some of these include: consistency in marking on all turbines with wind energy company identification, the strength and type of illuminated marking on turbines, AIS on turbines, minimization of Marine Radio Activated Sound systems in arrays, and others. The Task Force created a subcommittee that will continue to work to provide additional recommendations in coming months and the Task Force would be willing to engage proactively with BOEM and the USCG to provide updates on progress and consensus recommendations reached by the two industries to inform BOEM's actions in this regard.

Relationships between the commercial fishing industry and offshore wind industry are strengthening with the establishment of the RODA Joint Industry Task Force and we feel this is the cooperative platform to generate consensus on important topics, like navigational safety recommendations, that can better inform BOEM and coordinating federal agencies' policies. We request that should BOEM move forward and finalize the proposed guidelines, they will be responsive to amendments if/as/when new recommendations emerge, including the recommendations of the Task Force.

RODA's Joint Industry Task Force and its member organizations thank you for your consideration of this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Annie Hawkins".

Annie Hawkins, Executive Director

A handwritten signature in blue ink, appearing to read "Lane Johnston".

Lane Johnston, Programs Manager

*On behalf of the RODA Joint Industry Task
Force members*