



**Leading Light
Wind**

Leading Light Wind Project

Agency Communication Plan (rev.1)



Prepared By:

Invenergy Wind Offshore LLC

Version Updates

Version	Revision Date	Revision Description
Agency Communication Plan (rev.1)	March 23, 2023	Changed Leading Light Wind point of contact from Shannon Stewart to Carmen Bernett

Table of Contents

1.0	Introduction	4
1.1	Overview of Project Sponsors	4
1.2	Overview of Project	4
1.3	Principles and Objectives	5
1.4	Agency Coordination Plan Guiding Principles	5
1.5	Agency Coordination Plan Objectives	5
2.0	Agency Communication	6
2.1	Primary Communication Team	6
2.2	Federal Agencies	7
2.3	State and Local Agencies	9
3.0	Communication Methods	10
3.1	Initial Outreach	10
3.2	As-Needed Meetings	10
3.3	Agency Communication Log	11
3.4	Progress Reports	11
3.5	Project Webpage	11
3.6	Planning for Subsequent Project Stages	11
4.0	Coordination of Engagement Across Leases	13

1.0 Introduction

The Agency Communication Plan (ACP) reflects the development of strategies and procedures for the Leading Light Wind Project (the project) to engage with federal, state, and local agencies regarding permits and consultations for developing Lease OCS-A-0542 and for the life of the project. This ACP describes the approach for early and active information-sharing, focused discussion of potential issues, and collaborative identification of solutions to improve the quality and efficiency of agency decision-making processes and promote the sustainable development. The ACP will be updated and refined over time and made available via the Leading Light Wind Project webpage (<https://leadinglightwind.com>).

The ACP defines the guiding principles for communication and engagement with key federal, state, and local agencies, identifies agency contacts, and proposes communication methods to convey project information and solicit meaningful input. The ACP will evolve based on project activities and shared experiences of the project sponsors, agencies, and stakeholders.

This ACP complies with the terms of Lease OCS-A-0542 between the Invenergy Wind Offshore LLC and the Bureau of Ocean Energy Management (BOEM). Development of Lease OCS-A-0542 will follow the requirements of offshore renewable energy and alternate use regulations at 30 CFR Part 585 as well as other applicable statutes and regulations in existence.

1.1 Overview of Project Sponsors

Invenergy Wind Offshore LLC (Invenergy), a global renewable energy developer, and New York-based energyRe are collectively referred to as the project sponsors. Invenergy and its affiliates have successfully developed more than 30 gigawatts of projects that are in operation, construction, or are contracted, including more than 890 megawatts of wind, solar, and advanced energy storage projects in New York. This furthers the State of New York's renewable energy policy, which requires 70 percent of the state's energy to come from renewable sources such as solar by the year 2030. Invenergy's New York projects operate under the supervision and regulatory authority of the New York State Public Service Commission and the Federal Energy Regulatory Commission. EnergyRe is an independent New York company focused on solving complex challenges and providing clean energy solutions. The team at energyRe has expertise in infrastructure, engineering, and development.

1.2 Overview of Project

The Invenergy Wind Offshore LLC executed an offshore wind lease in the New York Bight in April 2022. The lease location (OCS-A-0542) is 40 miles east of Atlantic City and 80 miles south of Long Island and encompasses approximately 84,000 acres of the outer continental shelf.

The Leading Light Wind Project will include wind turbine generators as well as an export cable connecting to the onshore grid. The development of the cable to export power and to interconnect with the electrical grid will occur within the power procurement process, which is underway in New York and New Jersey. The project is anticipated to produce over 2,000 megawatts that could power over 650,000 homes annually.

The project sponsors are establishing protocols for offshore and onshore data collection and surveys. The data will support preparation and submittal of a Construction and Operations Plan (COP) to BOEM. Upon approval of the COP,

BOEM will provide a Notice of Intent to prepare an Environmental Impact Statement (EIS), which will analyze potential impacts of the project and identify proposed avoidance, minimization, and mitigation measures.

1.3 Principles and Objectives

The project sponsors recognize the need for early coordination and communication with federal, state, and local agencies, and to coordinate with other NY Bight offshore wind leaseholders. This ACP will guide communication throughout project development, the environmental review process, and during construction and operation.

The ACP will be refined as project development progresses and after receiving input from BOEM and other participating agencies on the draft ACP provided on August 26, 2022.

1.4 Agency Coordination Plan Guiding Principles

The project sponsors abide by the following guiding principles to facilitate agency involvement throughout project development, permitting, construction, and operation:

- **Transparency and Accountability.** The project sponsors collaborate and consult with agencies, communities, and other stakeholders at every stage of development, starting early to identify key issues, resolve challenges, and achieve buy-in.
- **Responsible Development.** The project sponsors strive to site, construct, and operate projects responsibly, with the goal to minimize environmental and community impacts. Invenenergy seeks input from agency experts on resource impacts and means to avoid, minimize, and mitigate such impacts.
- **Ongoing Monitoring.** Once projects are operational, the project sponsors conduct ongoing monitoring to minimize risks to resources.

1.5 Agency Coordination Plan Objectives

The ACP defines strategies and procedures that will guide engagement with federal, state, and local agencies regarding permits and consultations for developing Lease Area OCS-A-0542 for the life of the project. The project sponsors have identified the following objectives for the ACP:

- Provide consistent and timely updates on the project.
- Maintain a repository of accurate and current contact information for the project sponsors, BOEM, and agency primary points of contact.
- Engage with agencies at key project stages, milestones, and deliverables.
- Facilitate focused discussion of potential issues.
- Allocate dedicated time and space for agencies and the project sponsors to work toward collaborative solutions.
- Recognize agency staff and time constraints, ensuring communications are clear, concise and meaningful.

2.0 Agency Communication

Primary agency communication and coordination will occur between the project sponsors and BOEM’s Office of Renewable Energy Programs (OREP). BOEM is responsible for offshore renewable energy development in federal waters. BOEM’s OREP facilitates the responsible development of renewable energy resources on the outer continental shelf through conscientious planning, stakeholder engagement, comprehensive environmental analysis, and sound technical review.

2.1 Primary Communication Team

Three primary points of contact have been designated:

- The **Project Permitting Manager** will serve as primary point of contact regarding federal project permits and approvals, including the environmental review process.
- The **BOEM Project Coordinator** will serve as the primary point of contact for BOEM regarding federal project permits and approvals including the environmental review process.
- The **Project Agency Liaison** will oversee implementation of the ACP on behalf of the project sponsors. The Agency Liaison will be fully integrated with the larger project team, reporting to the Permitting Manager and engaging directly with agencies. The Agency Liaison will communicate directly with the primary points of contact identified for each agency and party listed in this ACP. Responsibilities of the Agency Liaison include, but are not limited to the following:
 - Convey project milestones and updates, information requests, and anticipated opportunities and challenges.
 - Coordinate meetings and correspondence with the parties identified in this ACP.
 - Facilitate opportunities for the project sponsors and agencies to work toward collaborative solutions.

Table 1 provides contact information for the three individuals identified above.

Table 1 – Project Primary Points of Contact

Role	Organization	Contact Name	Contact Information
Project Permitting Manager	Leading Light Wind	Carmen Bernett	cbernett@invenergy.com 708-883-3878
BOEM Project Coordinator	BOEM OREP	Annette Ehrhorn	Annette.ehrhorn@boem.gov
Project Agency Liaison	Leading Light Wind	Carmen Bernett	cbernett@invenergy.com 708-883-3878

2.2 Federal Agencies

The project sponsors sent an introductory email to the federal agencies responsible for project permits, consultations, and approvals and agencies with special expertise to confirm the appropriate points of contact. The project sponsors will send the ACP to those contacts and request participation in the ACP process.

Table 2 lists applicable federal agencies and their roles and responsibilities. This table, and the ACP, will be updated and refined as project development progresses and specific agency engagement is undertaken.

Table 2 – Federal Agencies and Roles and Responsibilities

Agency	Roles & Responsibilities
Bureau of Ocean Energy Management (BOEM)	National Environmental Policy Act Lead Agency, Outer Continental Shelf Lands Commercial Lease, Site Assessment Plan, Construction and Operations Plan (COP), and survey plans.
U.S. Army Corps of Engineers (USACE)	Coordination related to Clean Water Act Section 404, 408, and Rivers and Harbors Appropriation Act Section 10 permitting; likely cooperating agency for National Environmental Policy Act.
U.S. Fish and Wildlife Service (USFWS)	Consultation related to Section 7 of the Endangered Species Act Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, Fish and Wildlife Coordination Act, and Coastal Barrier Resource System; likely cooperating agency for National Environmental Policy Act.
U.S. Coast Guard (USCG)	Consultation related to private aids to navigation installed and maintained by anyone other than the USCG; likely cooperating agency for National Environmental Policy Act.
U.S. Department of Defense	Consultation related to national security maritime uses that occur within and surrounding the project area.
National Oceanic and Atmospheric Administration (NOAA Fisheries), National Marine Fisheries Service (NMFS)	Consultation related to Section 7 of the Endangered Species Act and Essential Fish Habitat, Magnuson-Stevens Fishery Conservation; likely cooperating agency for National Environmental Policy Act.
United States Environmental Protection Agency (USEPA)	Consultation related to Section 309 of the Clean Air Act and Clean Water Act requirements (permitting and sole source aquifer); potential cooperating agency for National Environmental Policy Act

Federal Agency Contact Information

Table 3 lists the identified points of contact for each of the identified federal agencies. The project sponsors have requested confirmation of this information.

Table 3 – Preliminary Points of Contact for Agencies

Agency/Stakeholder	Name	Contact Information
U.S. Army Corps of Engineers (USACE)	Dr. Christopher Mallery Acting Chief, Regulatory Branch Mr. Stephan Ryba Acting Deputy Chief, Operations Division	North Atlantic Division US Army Corps of Engineers Bldg # 301 Fort Hamilton Brooklyn, NY 11252 Mobile: 347-967-7745 Christopher.S.Mallery@usace.army.mil Stephan.A.Ryba@usace.army.mil
U.S. Fish and Wildlife Service (USFWS)	Noelle L. Rayman-Metcalf, Endangered Species Biologist	U.S. Fish and Wildlife Service New York Field Office 3817 Luker Rd. Cortland, NY 13045 607-753-9334 noelle_rayman@fws.gov
U.S. Coast Guard (USCG)	Elizabeth J. Marshall <i>USCG Sector Delaware Bay</i> Matthew K. Creelman <i>Fifth Coast Guard District</i> John M. Singletary, Gregory P. Hitchen, and Jeffrey M. Yunker <i>USCG Sector NY</i> Michele E DesAutels, Chris S. Sparkman, and Mark E. Cutter <i>First Coast Guard District</i>	Elizabeth.J.Marshall@uscg.mil Matthew.K.Creelman2@uscg.mil John.M.Singletary@uscg.mil Gregory.P.Hitchen@uscg.mil Jeffrey.M.Yunker@uscg.mil First Coast Guard District 212 Coast Guard Dr. Staten Island, NY 10305 Michele.E.DesAutels@uscg.mil Chris.S.Sparkman@uscg.mil Mark.E.Cutter@uscg.mil
U.S. Environmental Protection Agency (USEPA)	Mark Austin, Environmental Review Team, Strategic Programs, Region 2 New York Anne Rosenblatt Schaffer, Remedial Project Manager, Region 2 New York	Office of the Regional Administrator U.S. Environmental Protection Agency Region 2 290 Broadway, 25th Floor, New York, NY 10007 212.627-3952 Austin.Mark@epa.gov rosenblatt.anne@epa.gov

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Defense**

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**National Oceanic and
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Phone: (978) 281-99176
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2.3 State and Local Agencies

The project sponsors will coordinate with and invite agencies with state and local permitting roles and/or resource expertise to participate in the ACP as project development progresses and as clarity of a proposed transmission solution is identified (i.e., onshore and nearshore project components). For example, the agencies in New York State, if applicable, would include those involved in the Article VII, Siting of Major Utility Transmission Facilities process for transmission lines greater than or equal to 125 kV and extending 1 nautical mile or more. The project sponsors anticipate providing more detail on state and local agencies to include in the ACP in the next six to eight months and as available.

3.0 Communication Methods

The Project Agency Liaison will work closely with BOEM to identify coordination opportunities and will regularly engage with the agency contacts identified in this ACP. The project sponsors will seek feedback on the approach to the ACP and will adapt the ACP where appropriate to identify critical path items and allow for resource allocation within and among the various agencies.

Through a combination of outreach methods described in the following sections, the project sponsors will (1) regularly share project schedule, milestones, status, and planned activities with agency contacts; (2) clearly identify challenges and solutions related to permits and resources associated with the project; and (3) maintain open lines of communication with agencies.

Coordination with agencies will occur through a combination of in-person or virtual meetings, conference calls, and e-mail or hard copy correspondence.

3.1 Initial Outreach

The project sponsors provided this draft ACP to BOEM and other identified federal agencies for review and comment on August 26, 2022. Upon receipt of comments, feedback will be incorporated to update the ACP. The project sponsors will also schedule informational meetings on the project as requested by specific agencies.

If an agency responds in writing that it does not wish to participate in the ACP, the agency will no longer be included in ACP communications, and the change will be documented in this ACP. A decision to not participate in the ACP does not change the agency's regulatory authority or the need to communicate with the agency. If an agency does not respond to outreach, the project sponsors will continue to solicit participation in ACP engagement opportunities until the agency provides a response.

3.2 As-Needed Meetings

The project sponsors will coordinate virtual and in person meetings at various milestones or coordination points in the stages of the project to resolve issues as they arise. These meetings will be specific to the concerns of the agency involved. Issues may pertain to specific resources, geographies, or topical area. Meeting objectives may include information-sharing, discussion of study methodology or approach, discussion of potential impacts, or achieving consensus on avoidance, minimization or mitigation strategies. The project sponsors will host these meetings, which may be requested by agencies as needed.

The project sponsors will communicate as needed with agencies throughout the project's development to:

- Answer specific questions or interests, and to identify the applicable studies and impact analyses to be performed and how they pertain to the project.
- Coordinate with appropriate agency staff during early development of the project and throughout the environmental review process.
- Consult with agency staff at appropriate times during the environmental survey and analysis process.
- Coordinate as required by regulations or as needed to inform the process.

3.3 Agency Communication Log

Meetings or conference calls with interested agencies will be scheduled periodically throughout the project development process. These meetings will include a standard agenda and will provide agency staff with consistent and transparent information about the project's progress, schedule, and critical path items that involve agency decision-making or review.

The project sponsors will maintain an agency communication log to include letters, meeting notes, phone logs, and/or emails where substantive information has been discussed or received.

3.4 Progress Reports

To encourage transparency and to comply with the terms of Lease Agreement OCS-A-0542, the project sponsors will submit a public-friendly draft progress report to BOEM every six months through from the surveys and data collection process through approval of a COP. The draft progress report will include the following:

- A brief narrative of engagement objectives and activities
- A copy of the Agency Communications Log
- A description of agency feedback prior to coordination points (e.g., transmission planning prior to proposing any export cable route)
- A list of anticipated or scheduled engagement activities for the next reporting period.

Upon BOEM review and comment, the project sponsors will finalize the progress report and provide to BOEM to share with the public via the BOEM website or other methods as requested.

3.5 Project Webpage

The Leading Light Wind Project website (<https://leadinglightwind.com>) will include a dedicated page specifically for the public to access the latest ACP. The project sponsors will distribute outreach and educational materials on the project website, which will offer updates and provide links to information on the regulatory process and other important stakeholder issues.

3.6 Planning for Subsequent Project Stages

As the development progresses, the ACP will be updated ahead of the phases of the project, including the following:

- **Surveys and Data Collection** – This phase of activity will include data collection and survey campaigns including but not limited to geophysical, geotechnical, and benthic surveys. The Agency Liaison will ensure that appropriate agencies are apprised and engaged with regarding any resource surveys.
- **Design and COP Preparation** – The Agency Liaison will use agency and other stakeholder communication received to date to inform the wind farm design and layout (e.g., wind turbine generators, offshore substation foundations, inter-

array cables, and export cable routes). The ACP will be adjusted as necessary during the continued engagement with agencies during the design and COP preparation phases of the project.

- **Construction and Installation** – Ahead of construction and installation activities, the ACP will be further refined and reviewed with agencies and other stakeholders to facilitate ongoing communication and engagement. The ACP will be adjusted as needed.
- **Decommissioning** – Prior to the decommissioning, the ACP will be updated to address this final phase of the project.

As previously stated, the ACP will evolve based on project activities being executed. This evolution will be based on shared experiences of the project sponsors and agencies and stakeholders and will require the continued engagement and dedication of all parties to be effective.

4.0 Coordination of Engagement Across Leases

NY Bight leaseholders have begun to engage with one another in introductory meetings, with the shared goal of reducing burdens on resource-limited agencies and stakeholders. The project sponsors continue to collaborate with these leaseholders and agencies, specifically agreeing to the following shared objectives:

- To work together to identify innovative avoidance, minimization, mitigation, and monitoring measures based on lessons learned in the industry both domestically and globally.
- To seek opportunities to meet as a group on select topics to reduce the need for individual meetings with agencies, as was recently done for the NY Bight Programmatic Environmental Impact Statement (PEIS).
- To seek to meet jointly in other forums and/or request joint “NY Bight” presentations/agenda items at various working group and stakeholder meetings to reduce the need for individual presentations.
- To work together to coordinate port hours so that fishers have consolidated, rather than dispersed, times to discuss issues with NY Bight leaseholders.
- To participate in BOEM convenings of Native American Tribes.

The project sponsors welcome agency comments and suggestions to further coordinate with NY Bight leaseholders throughout this effort.

