

Atlantic Shores Offshore Wind, LLC 1 Dock 72 Way, Floor 7 Brooklyn, NY 11205

April 1, 2021

Karen Hanley Acting Director Federal Permitting Improvement Steering Committee 1200 New Jersey Avenue, SE Washington, DC 20590 (submitted via email to: fast.fortyone@fpisc.gov)

# Subject:FAST 41 Initiation Notice for Commercial Lease of Submerged Lands for<br/>Renewable Energy Development on the Outer Continental Shelf (OCS-A<br/>0499) - Atlantic Shores Project 1

Dear Ms. Hanley:

Atlantic Shores Offshore Wind, LLC (Atlantic Shores), a joint venture between EDF-RE Offshore Development, LLC and Shell New Energies US LLC, is pleased to submit this FAST 41 Initiation Notice (FIN) to support the development of offshore wind, under the Commercial Lease of Submerged Lands for Renewable Energy Development on the Outer Continental Shelf OCS-A 0499 (Lease) for Atlantic Shores Project 1. Atlantic Shores, the current lessee under the Lease, proposes to construct within the 183,353-acre Lease Area and within Export Cable Route Corridors from the Lease Area to shore landing locations along the coast of New Jersey.

Please find enclosed the FIN seeking enhanced coordination and oversight from the Federal Permitting Improvement Steering Committee (FPISC). Should you have any questions or comments regarding the enclosed material, please feel free to contact me or the Atlantic Shores Permitting Manager, Paul Phifer:

Paul Phifer, PhD, Permitting Manager Email: paul.phifer@shell.com Phone: (413) 800-4598 We thank you in advance for your time, and we look forward to working with you and your team.

Sincerely,

Jennifer Daniels

Jennifer A. Daniels Development Director Atlantic Shores Offshore Wind, LLC

cc: Isis Farmer, BOEM David MacDuffee, BOEM Annette Moore, BOEM Michelle Morin, BOEM Paul Phifer, Atlantic Shores Ross Pilotte, FPISC Brandi Sangunett, BOEM Will Waskes, BOEM Atlantic Shores Offshore Wind, LLC FAST 41 Initiation Notice March 30, 2021

### 1) **Project Information**

- Title: Atlantic Shores Project 1
- Sector: Wind
- Type: Federal Offshore
- Location (centerpoint given): 39° 21.666'N Latitude, 74° 3.193'W Longitude

### 2) Project Sponsor

- Atlantic Shores Offshore Wind, LLC
- Contact information: Paul Phifer, Permitting Manager, paul.phifer@shell.com, 413-800-4598

### 3) Statement of the purposes and objectives of the project

The purpose of the Atlantic Shores Project 1 is to develop an offshore wind energy generation facility in the Bureau of Ocean Energy Management (BOEM) Lease Area OCS-A 0499 to provide clean, renewable energy to the Northeastern U.S. by the mid-to-late 2020s. The Project will help both the U.S. and New Jersey achieve their renewable energy goals, diversify the State's electricity supply, increase electricity reliability, and reduce greenhouse gas emissions (GHGs). The Project will also provide numerous environmental, health, community, and economic benefits and will create substantial new employment opportunities.

Presidential Executive Order 14008 (Tackling the Climate Crisis at Home and Abroad), signed on January 27, 2021, directs the Secretary of the Interior, in consultation with other federal agencies, to review siting and permitting processes to identify steps to double offshore wind energy production by 2030. New Jersey's renewable energy goals include reaching 7,500 megawatts (MW) of offshore wind energy capacity by 2035, as outlined in the 2020 New Jersey Offshore Wind Strategic Plan, and achieving 100% clean energy by 2050, as described in the 2019 Energy Master Plan.

Currently, a limited number of BOEM offshore renewable wind energy lease areas can support both the U.S.' and New Jersey's ambitious renewable energy goals within the mandated timeframes. Atlantic Shores' Lease Area OCS-A 0499 is one of five lease areas in proximity to New Jersey. Of those lease areas, Lease Area OCS-A 0499 contains the largest uncommitted area for renewable energy development to support both the national mandate for offshore wind and the State of New Jersey's ongoing and future renewable energy solicitations.

## 4) Concise description including general location and/or a summary of geospatial information, if available, and the locations, if any, of environmental, cultural, and historic resources.

Atlantic Shores Project 1, at its closest point, is approximately 8.7 miles (14 kilometers [km]) from the New Jersey shoreline and will include an array of wind turbine generators (WTGs), multiple offshore substations (OSSs), and potentially several meteorological (met) tower and/or meteorological and oceanographic (metocean) buoys. The Construction and Operations Plan (COP), developed pursuant to 30 Code of Federal Regulations (CFR) 585.626 and 627, provides extensive information on the Lease Area and propose project infrastructure including: wind turbine generators; offshore substations; met towers and buoys; marine cable system comprised of export, inter array and interlink cables/routes; onshore interconnection cables/routes; and onshore substations. This information is summarized in the body of the COP and associated technical appendices. The COP, and its supplemental filings coming later in 2021, extensively describes the physical, biological, cultural, economic, and cultural resources in the Lease Area.

## 5) Statement regarding the technical and financial ability of the project sponsor to construct the proposed project

Atlantic Shores Offshore Wind, LLC (Atlantic Shores) is a 50/50 joint venture (JV) between EDF-RE Offshore Development, LLC (a subsidiary of EDF Renewables, Inc.) and Shell New Energies US LLC (indirectly owned by Royal Dutch Shell), and was formed for the sole purpose of developing Lease Area OCS-A 0499. As a JV, Atlantic Shores actively draws upon the full strength of its two parent companies (Parents), including building an experienced team of more than 35 full time equivalents, which will continue to grow as the Project matures toward a Final Investment Decision (FID) and start of construction. Our Parents' technical expertise and capabilities will enable Atlantic Shores to bring the Project to fruition. Atlantic Shores will draw upon the collective experience of hundreds of renewables and offshore specialists who design, procure, manage, construct and operate over 11 GW of renewable energy projects. In the United States alone, Atlantic Shores has access to the extensive combined experience of a 21,000-person workforce, with specific expertise in developing offshore projects and bringing offshore wind power to the electrical grid. This includes overcoming technical challenges, optimizing energy output and minimizing and controlling costs, risks and schedule, building up local supply chains, and cohabiting with other users of the sea.

The Project is intended to be fully financed through Atlantic Shores' upstream Parents' balance sheets, subject to the FID. With a combined balance sheet strength of \$707 billion and experience in financing similar renewable energy projects, EDF Renewables, Inc. and affiliates, owned by EDF Renouvelables S.A. (collectively, the EDF Renewables Group), and Shell New Energies US LLC and affiliates, owned by Royal Dutch Shell (collectively, the Shell Group), can comfortably carry the Project forward on that basis

alone. In addition, in light of the recent extension of the Investment Tax Credits (ITC), it is also anticipated that Atlantic Shores will seek to monetize the 30% ITC through tax equity financing, which will occur just prior to commissioning of the first wind turbine generator.

### 6) Statement of any Federal financing, environmental reviews, and authorizations anticipated to be required

Atlantic Shores is not expecting any Federal financing. Table 1 identifies the expected Federal environmental reviews and authorizations for Atlantic Shores Project 1 and their associated timelines.

Regulatory Authority	Permit/Approval	Submission Date	Approval/ Completion Date		
Federal Permits/Approvals					
BOEM	Site Assessment Plan (SAP) approval	December 6, 2019	Expected Q2 2021		
	COP approval/Record of Decision (ROD)	Expected Q1 2021	Expected Q2 2023		
	National Environmental Policy Act (NEPA) Review	To be initiated by BOEM	Expected Q2 2023		
	Consultation under Section 7 of the ESA with NMFS and USFWS, coordination with New Jersey under the CZMA, government- to-government tribal consultations, consultation under Section 106 of the NHPA, consultation with DoD, consultation with NMFS under the MMPA, and consultation with NMFS for Essential Fish Habitat.	To be initiated by BOEM	Conducted concurrently with NEPA and COP review process		
	Facility Design Report (FDR) and Fabrication and Installation Report (FIR)	Expected Q1 2024	Expected Q1 2024		
EPA	OCS Air Permit	Notice of Intent submission expected Q1 2021 OCS Air Permit Application submission expected Q1 2022	Expected Q2 2023		
USACE	CWA Section 404 (required for discharge of dredged materials and placement of foundations, scour protection, and cable protection)	Expected Q2 2021	Expected Q2 2023		

### **Table 1: Federal Reviews and Authorizations**

	Rivers and Harbors Act of 1899 Section 10 Individual Permit (required for all offshore structures and dredging activities) Section 103 of the Marine Protection, Research, and Sanctuaries Act (for dredged material disposal, if required)		
NMFS	Letter of Authorization (LOA) or Incidental Harassment Authorization (IHA)	Expected Q1 2022	Expected Q3 2023
USCG	Private Aid to Navigation (PATON)	Expected Q3 2023	Expected Q4 2023
FAA	Determination of No Hazard to Air Navigation	Expected Q3 2022	Expected Q2 2023

# 7) Assessment that the project meets the definition of a covered project as defined in 42 U.S.C. §4370m(6)(A) of the FAST Act and a statement of reasons supporting the assessment

Atlantic Shores Project 1 meets the definition of a covered project as defined in 42 U.S.C. §4370m(6)(A) of the FAST Act because:

- It is subject to NEPA. Atlantic Shores recently submitted its COP to BOEM in order to start the process toward BOEM's development of an environmental impact statement (EIS) under NEPA. Atlantic Shores will not be able to operate unless an EIS is completed for the project and a subsequent Record of Decision (ROD) is issued.
- 2) The project will require a total investment of more than \$200m. An offshore wind project of this size is expected to cost no less than several billion dollars (USD).
- 3) It does not qualify for abbreviated authorization or environmental review processes under any applicable law. Given the magnitude of this project, full non-expedited Federal reviews and authorizations are required.

Ultimately, as this Atlantic Shores Project 1 is subject to NEPA, requires an EIS, is highly complex, and requires authorization from more than two Federal, it would likely benefit from enhanced oversight and coordination from FPISC.