



208 South Great Road, Lincoln, MA 01773  
781.259. 2172 [hricci@massaudubon.org](mailto:hricci@massaudubon.org)

December 14, 2020

Office of Coastal Zone Management  
251 Causeway Street, Suite 800  
Boston, MA 02114  
Attention: Prassede Vella

Via Email: [prassede.vella@mass.gov](mailto:prassede.vella@mass.gov)

Re: **Review and Update of the 2015 Massachusetts Ocean Management Plan**

Dear Ms. Vella:

Mass Audubon is pleased to see that the process is underway to conduct the required 5-year review of the Massachusetts Ocean Management Plan. Massachusetts was the first state to adopt a law requiring a comprehensive plan for management of the ocean resources within its territorial boundary. We encourage the Commonwealth to continue its leadership in this important planning and regulatory arena. We also encourage additional coordination with neighboring states and throughout the region, as these valuable public resources are interconnected and utilized beyond the artificial jurisdictional boundaries.

The Plan includes baseline assessment of physical, natural and cultural resources, existing uses, and economic values. It establishes research priorities including further assessment of sediments and ecological resources including fish and shellfish, marine mammals, and birds. Uses ranging from transportation, fishing, dredging and renewable energy development are also addressed. The state ocean waters are divided into three use categories: prohibited, multi-use, and renewable energy. Specific categories of uses are further addressed where allowed, and as regulated under various laws and programs. The update should include thorough review of all aspects of the Plan, including new and emerging information. For example, although no renewable energy projects are presently proposed within state waters, the potential for new technologies needs to be updated and considered.

The update should include an in-depth assessment of the effects of climate change on all resources and uses, with careful review of the most up to date available information and projections, and priority actions to avoid and reduce impacts and alignment with state, regional, national, and international climate initiatives.

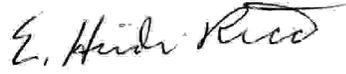
The Plan currently includes designated corridors for transmission lines to connect offshore wind facilities with the electric grid on land. The review process should evaluate the potential for coordinated development of an offshore wind grid managed as a system rather than independent lines for each individual project. This analysis should evaluate both the resource impacts and costs of different approaches to this issue, including the land side impacts associated with inefficient build-out of the available off-shore corridors and landfall locations<sup>1</sup>.

---

<sup>1</sup> [https://brattlefiles.blob.core.windows.net/files/18939\\_offshore\\_transmission\\_in\\_new\\_england\\_-\\_the\\_benefits\\_of\\_a\\_better-planned\\_grid\\_brattle.pdf](https://brattlefiles.blob.core.windows.net/files/18939_offshore_transmission_in_new_england_-_the_benefits_of_a_better-planned_grid_brattle.pdf)

We look forward to a robust stakeholder engagement process for the Plan update, and further opportunities to comment.

Sincerely,

A handwritten signature in black ink that reads "E. Heidi Ricci". The signature is written in a cursive style with a prominent flourish at the end of the name.

E. Heidi Ricci  
Director of Policy