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4. BOEM's final guidance should include provisions to accommodate any site-specific conditions and project-specific components. While BOEM had recently proposed reducing the threshold to 1500m for near term projects the agency is apparently now implementing the sound standard at 1km starting in May 2026 in regulatory documents.¹ Supply chain and domestic of shore wind industry investments for projects are made well before a project is built. Prior to the implementation of such a standard, there needs to be robust evidence that any applicable limit would be technically and economically feasible. This is a prime example of why these guidelines must be developed collaboratively with industry so that unintended consequences are avoided before they become barriers to development.
 5. Implementation of a vessel sound emissions management plan appears both unnecessary and impractical. The relative amount of vessel sound associated with of shore wind is minimal. Based on estimates from MarineTraffic.com, of shore wind vessels account for less than 2% of all of shore vessel traffic. Given that of shore wind accounts for such a small percentage of marine traffic, implementation of the sound emissions management plan will provide no measurable protection to species and will instead add to the burden of the of shore wind industry and ratepayers. In addition, this plan would not be feasible for projects currently in the permitting pipeline as they are already making procurement decisions and entering into contracts with vessels and because of the limited vessel availability due to the nascent U.S. supply chain and Jones Act requirements.
 6. Requiring sound field verification (SFV) at every turbine location would be unnecessary and cost prohibitive. We believe a standardized target sub-sample of turbine locations would be more than sufficient to determine the effectiveness of sound reduction mitigation measures. Again, empirical data compiled from the projects currently conducting SFV could be discussed at our proposed BOEM-industry forum and would inform a broader discussion on how best to incorporate lessons learned from early projects.
 7. The Proposed Guidance creates a potential regulatory roadblock, as it would establish limits that are inconsistent with current National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) practice. In particular, standard practice in Marine Mammal Protection Act (MMPA) incidental take authorizations is currently for NOAA NMFS to establish marine mammal harassment zone sizes based on a modeled 10 dB reduction in pile driving sound

