February 22, 2021

Program Manager
Office of Renewable Energy
Bureau of Ocean Energy Management
45600 Woodland Road
Sterling, Virginia 20166

Re: South Fork Wind Farm and South Fork Export Cable Project Draft Environmental Impact Statement, BOEM 2020-057

I write on behalf of the National Ocean Industries Association or NOIA. An almost 50-year-old organization, we represent all segments of the offshore energy industry. This includes traditional fossil fuels such as oil and gas, primarily in the Gulf of Mexico, but also important new sources of energy like offshore wind. Further, our members include not just energy developers but also the businesses large and small who do the work of building, supplying, and maintaining these projects. In other words, we represent hundreds of thousands of blue-collar and white-collar employees stretching from New England to the Gulf Coast and across the nation.

As an organization, NOIA *strongly* supports ongoing attempts to build new offshore wind resources in federal waters. Projects like the 132 megawatt South Fork Wind Farm—with its potential to bring clean, affordable energy to 70,000 homes on Long Island—are vital to the economic growth of this country and efforts to meet environmental goals for the 21st century. According to recent estimates, we have a $70 billion[1] market off America's coasts for wind in the next 10 years. That means clean, reliable energy in places like New England and New York where building infrastructure onshore is famously difficult and industrial growth has sometimes been hard to come by.

Indeed, this project's consideration comes at a vital time for the United States. In recent weeks, President Joseph R. Biden came into office with a promise to reduce the carbon-intensity of the American economy and meet our country's goals to avert the worst impacts of climate change. As part of this, in the president's first days in office he signed an Executive Order in which he declared a goal of "doubling offshore wind by 2030".[2] Representative Deb Haaland, who has been nominated to the position of Interior Secretary, and will have her first confirmation the day after comments on South Fork's Draft Environmental Impact Statement (DEIS) are due, has been equally vocal on her belief that by replacing "carbon-polluting energy with wind, solar and other clean energy sources… we can improve public health, resilience and economic outcomes for the communities that have historically borne the burden of pollution..."[3] **Quite simply, neither the**

[1] https://www.cnbc.com/2019/12/13/us-has-only-one-offshore-wind-farm-but-thats-about-to-change.html
[2] https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/
[3] https://thehill.com/blogs/congress-blog/energy-environment/494139-coronavirus-is-teaching-us-that-we-have-a-role-to-play

goals set by President Biden and Representative Haaland, nor the vital mission behind them, can be met without the timely approval of projects like South Fork.

Critically, the local community is *also* fighting to have these goals met. The community of East Hampton—a key recipient of the power from South Fork—has set goals to reach 100% renewable energy.[4] It is also clear that the debate around fossil fuels in Long Island remains a topic of interest for both local officials and the public.[5][6] In essence, the community agrees with national leadership that now is the time to move towards renewable energy sources. For an area rich in wind resources like the East Coast and the Atlantic Ocean between Rhode Island and Long Island, that means offshore wind.

As expected and discussed in the DEIS, these projects effectively minimize adverse impacts and avoid undue burden on local communities. In almost every area reviewed in the DEIS, the impacts for the area are inconsequential. Potential impacts mentioned by BOEM would be temporary, such as the impacts that would only occur during construction. The long-term benefit are tremendous for the region with decades of clean energy on the horizon.

Furthermore, marine related impacts, such as the potential for impacts on North Atlantic right whales or other vulnerable species, will be effectively mitigated so that these species remain protected. While moderate impacts may occur during construction, the focused efforts of the companies to minimize or prevent impacts are impressive. As we mentioned in the Vineyard Wind docket, our member company Ørsted, a key partner in the South Fork project, has joined with the Woods Hole Oceanographic Institution and a group of universities to launch the Ecosystem and Passive Acoustic Monitoring project—explicitly designed to better understand the presence of key mammals.[7] Further, their planned Rhode Island innovation hub is being touted as a potential launching point for novel technologies dedicated to marine mammal protection.[8] Given all of this, the impact on marine mammals in the area will not only be manageable and minimized, but those impacts will be lessened in the future as new technologies and techniques are developed to further protect species.

There were areas where BOEM did see the potential for more moderate impacts which we would like to discuss in more detail. For example, BOEM highlights the potential for Environmental Justice concerns on lower-income communities during construction.[9] While *any* industrial activity has the potential to impact communities, BOEM is missing the "forest for the trees". The

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[4] https://d3n8a8pro7vhmx.cloudfront.net/renewableenergylongisland/pages/77/attachments/original/1422739644/RES-2014-662_Energy_Goals_for_the_Town_of_East_Hampton__Long_Island__NY.pdf?1422739644

[5] https://www.easthamptonstar.com/government/2020115/fossil-fuel-vs-renewables-pressure-lipa

[6] https://www.nydailynews.com/opinion/ny-letter-october-4-20191004-nzo5nwabkvb3xkkmu4ysmqrg5i-story.html

[7] https://www.windpowerengineering.com/orsted-academic-partnership-will-assist-in-protecting-right-whales-in-u-s-offshore-wind-portfolio-waters/

[8] https://www.providencejournal.com/news/20200302/wind-power-developer-opens-2nd-ri-office

[9] https://www.boem.gov/sites/default/files/documents/renewable-energy/SFWF-DEIS_0.pdf

electricity provided by South Fork—again, enough to power some 70,000 homes—will need to come from *somewhere*.

If clean energy projects are not built, the likely result will be a higher capacity factor for existing plants or perhaps construction of new facilities. Individuals who live near certain powerplants have historically been lower-income individuals than the national average[10] and have faced lower home values.[11] The literature is also quite clear that living near (often older) power generating facilities with fewer controls has a direct-line relationship to negative health outcomes for the communities who live nearby them, with the journal Nature Energy actually demonstrating that in the worst cases a plant's closure reduces the use of emergency inhalers and other signs of poor lung-health in nearby communities.[12] This is not merely hypothetical on Long Island.

It is clear that the community is concerned with the environmental impact of the existing Northport Power Plant that is a significant piece of Long Island's generating fleet.[13] **Likewise, the E.F. Barrett Generating Station on Long Island—another key piece of the existing electrical system on Long Island—is roughly half a century old and emits 30 times more nitrogen oxide than newer facilities.[14]** Nitrogen oxides like NO2 are known to reduce long function, worsen asthma and increase hospital admissions.[15] In fact, for *years* the Long Island community has planned on reducing the use of legacy power-plants through the construction of new renewable energy. A Long Island Power Authority report from 2016 projected that the capacity factor of three key plants on the island (including the two mentioned above) would fall dramatically in the out-years, at the same time they projected offshore wind would come online. They helpfully capped one chart with the blunt message "Renewables Reduce Usage and Emissions of Fossil Fuel Plants"[16]

Given this fact, while BOEM describes certain net-negative environmental justice impacts from the construction of South Fork, this seemingly is tied to the simple fact that *any* activity is occurring. If environmental justice is to be a credible discussion point around offshore wind construction, then BOEM should acknowledged the fundamental reality that the energy capacity of the project and the associated turbines will be located miles from communities thereby eliminating environmental justice issues. BOEM should also explore the fact that this is a region with a demand for power and somewhat limited options to secure it unless these communities instead welcome the construction of new, state-of-the-art fossil-fuel facilities. If offshore wind does not come to fruition in the region, it is entirely plausible that *legacy* fossil-fuel plants will fill that gap. We urge BOEM to consider the environmental justice implications of *not* building new renewable energy facilities like South Fork.

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[10] https://www.naacp.org/wp-content/uploads/2016/04/CoalBlooded.pdf
[11] https://www.realtor.com/news/trends/things-that-affect-your-property-value/
[12] https://www.nature.com/articles/s41560-020-0600-2
[13] https://www.wshu.org/post/concern-grows-over-northport-power-plant-emissions#stream/0
[14] https://www.liherald.com/stories/ef-barrett-generation-station-in-island-park-to-follow-new-dec-guidelines,121588
[15] https://www.lung.org/clean-air/outdoors/what-makes-air-unhealthy/nitrogen-dioxide
[16] https://www.lipower.org/wp-content/uploads/2016/10/Irp20Presention20BEST1.pdf

Further, it is important to note the economic opportunities that will be created by offshore wind to the north of Long Island. Southern New England—and especially Rhode Island and southern Massachusetts—has faced economic struggles in recent years. Rhode Island has lagged the rest of the region consistently.[17] That is likely why state business leaders are excited by the prospects of new jobs, with groups championing the fact that they hope to see 6,000 supply chain jobs created for every 100 turbines built.[18] It is promising that in recent months we have seen state officials in Rhode Island partnering with industry to offer virtual training for local businesses to meet the needs of the wind industry.[19] In fact, a study by the Workforce Development Institute found that the offshore wind industry calls for employing 74 different occupations for various steps of designing, building and operating a wind farm.[20]

In nearby Massachusetts, the Clean Energy Center (MassCEC), a state economic development agency, has identified a host of potential economic opportunities within the commonwealth related to offshore wind. This includes not just the ports used for staging and construction but also cables, secondary steel, substations, monopile and gravity foundation manufacture and assembly sites, nacelle, tower and blade construction and assembly sites as well as component storage.[21] This will help create jobs spanning from white collar to blue collar, entry-level to the highest-levels of expertise. For a region that, again, has seen historically stagnant growth, this as a significant net-positive that would not otherwise be created.

While BOEM does find in the DEIS the potential for impacts on the viewshed and notes that the recreational and commercial mariner community could experience "major adverse effects" to their viewshed, this may not necessarily be correct. While the view may change in some areas, it is worth noting that wind farms built offshore such as those near Nysted, Denmark have *attracted* pleasure-craft, with the then-mayor commenting that more sailboats have come to the town since the windfarm was built and the harbormaster discussing how popular the ability to sail inside the wind energy area has been with tourists and boat owners.[22] Likewise, the physical presence of the towers, bring their own *positive* impacts. We do applaud BOEM for referencing the "reef effect" offshore wind facilities can create; we believe this is an important fact. Fisherman often explicitly seek out the red snapper that congregate near oil and gas facilities and other offshore structures in the Gulf of Mexico[23] and off of California, and clearly BOEM Regions are aware (and have even funded studies that show) that the creation of fixed-bottom

[17] https://www.providencejournal.com/story/news/local/2020/11/10/bryant-economic-report-ri-regained-ground-over-summer-but-still-lags/6222118002/

[18] https://windwinri.com/

[19] https://electricenergyonline.com/article/energy/category/wind/141/867700/rhode-island-partners-with-network-for-business-based-osw-training.html

[20] https://wdiny.org/Portals/0/New%20York%20State%20and%20The%20Jobs%20Of%20Offshore%20Wind%20Energy_%20WDI2017.pdf?ver=2017-05-03-150746-023

[21] https://www.masscec.com/massachusetts-offshore-wind-ports-infrastructure-maps-0

[22] https://www.offshore-stiftung.de/sites/offshorelink.de/files/documents/Offshore_Stiftung_2013_04SBO_SOW_tourism_study_final_web.pdf

[23] https://www.saltwatersportsman.com/red-snapper-winter-season-texas/

structures have and can continue to attract more mariners, both commercial *and* recreational. Clearly, the global experience and even limited local experience show that we should not assume *negative* impacts from wind farms for the domestic tourism and sea-faring economy.

Regarding vessel traffic though, **we were disappointed to see the Vessel Transit Lane Alternative included in this DEIS and urge BOEM to instead work with experts at the U.S. Coast Guard to create a just and workable approach for this and future projects**. This, of course, is a matter thoroughly litigated in the recent Vineyard Wind DSEIS. Just as NOIA stated in *that* docket, the concept of a uniform layout will effectively accommodate vessel transit without significant impact, even though a 1 nautical mile layout as generally agreed to by industry and included in the South Fork proposal is already a concession that reduces density of turbines. Quite simply, a 1x1 layout best balances the interests of *all* who want to use federal waters; no one gets everything they want but no one is grievously harmed.

We defer to the experts at the Coast Guard who have reviewed a uniform, well-spaced layout for offshore wind projects. Just last year in the Port Access Route Studies, we were told that:

> USCG has determined that if [wind energy] turbine layout is developed along a standard and uniform grid pattern, formal or informal vessel routing measures would not be required as such a grid pattern will result in the functional equivalent of numerous navigation corridors that can safety accommodate both transits through and fishing within the WEA. While these navigation corridors would be smaller than those suggested by some commenters, the USCG believes they should be sufficient to maintain navigational safety and provide vessels with multiple straight-line options to transit safely throughout the MA/RI WEA.[24]

As you know, the Transit Lane alternative would create a 4 nautical mile-wide transit lane through the South Fork project. At the very least, such an approach is proven to reduce the ability to produce energy from the Wind Energy Area (WEA) in this region, something mentioned by various commenters in the Vineyard Wind SEIS and a clear negative in-and-of its own right. While there is some belief in the fishing community that these wider lanes are needed, as the Business Network for Offshore Wind commented in that docket that a precedent for creating wide transit lanes through wind areas would reduce the clean energy production in the area and "constrain the U.S. OSW industry's ability to mitigate climate change, the end result being even greater negative impacts upon fisheries in southern New England and along the Eastern Seaboard."[25] Climate change is well-established as a threat to fisheries and fishing communities[26], and construction of abundant renewable energy resources is a critical tool for combating climate change. The precedent of reducing America's ability to produce renewable energy from the earliest offshore wind projects should be avoided entirely. Wider lanes could

[24] https://www.federalregister.gov/documents/2020/05/27/2020-11262/port-access-route-study-the-areas-offshore-of-massachusetts-and-rhode-island

[25] https://www.offshorewindus.org/wp-content/uploads/2020/07/Business-Network-OSW-Comments-re-Vineyard-Wind-SEIS-FINAL-1.pdf

[26] https://www.msc.org/what-we-are-doing/oceans-at-risk/climate-change-and-fishing

end up chilling investment and opening the possibility that some offshore wind projects do not become reality for the Atlantic Coast.

However, our concerns are also for the more immediate safety of mariners. As the Coast Guard found, wider transit lanes amidst energy projects as considered here in the South Fork transit alternative would mean that "most traffic would be funneled into the corridors thereby increasing traffic density and risks for vessel interaction."[27] As we stated in the Vineyard Wind supplemental's record, NOIA's member companies have nearly half a century of experience with running vessels through multi-use areas, primarily in the Gulf of Mexico. This is an area that sees military, energy, commercial and recreational traffic regularly sharing common waterways. An arbitrary, limited number of corridors for a variety of ships will *never* be a prudent approach to routing vessel traffic, especially for ships which will come from different fleets, different ports, and different industries. Congested transit lanes are a source of consternation and concern and should not be artificially created lightly.[28]

In sum, the South Fork project will be an economic and environmental win for the region. We hope that BOEM continues to recognize this fact and explores and memorializes the positive aspects of offshore wind that are missing from the DEIS, while also avoiding unnecessary hindrances such as the Transit Lane Alternative concept.

Very respectfully,

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[27] https://www.federalregister.gov/documents/2020/05/27/2020-11262/port-access-route-study-the-areas-offshore-of-massachusetts-and-rhode-island
[28] https://www.marineinsight.com/marine-navigation/how-to-handle-a-ship-in-congested-high-traffic-waters/