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Empowering Communities, Advocating Solutions.

August 15, 2023

Jeffrey Willis, Executive Director
Kevin Sloan
RI Coastal Resources Management Council
4808 Tower Hill Road
Office #116
Wakefield, RI 02879

Dear Director Willis and Mr. Sloan:

Citizens Campaign for the Environment (CCE) is a 120,000 member, non-profit, non-partisan organization that empowers communities and advocates solutions to protect public health and our environment. CCE strongly supports advancing well-sited, environmentally responsible renewable energy projects and phasing out the use of antiquated fossil fuel power plants throughout New York State. **CCE is writing to express our support for Sunrise Wind.**

CCE commends Rhode Island and CRMC specifically for its leadership in advancing offshore wind in the US. The success of the Block Island Wind Farm has been an historical, critical first step in America's advancement of an emerging "wind-ustry" along the east coast.

It is important to remember that while offshore wind is new to the US, it is not new. The nearly three decades of global experience with offshore wind from across the world provide us with important data and key information. Countries including Belgium, China, Denmark, Finland, Germany, Ireland, Italy, Japan, the Netherlands, Norway, Sweden, and the United Kingdom have embraced offshore wind power. As of 2019, European offshore wind farms generate nearly 205,000 MW of renewable energy, or approximately 14% of the EU's power. We are seeing the benefits of offshore wind for local communities and minimal impacts on marine life overseas and can utilize those experiences to protect wildlife while building offshore wind off the east coast.

New York State is a leader in the fight against climate change and a national champion for offshore wind. The state is working towards achieving mandates of 70% renewable energy by 2030, carbon free electricity by 2040, and a net zero carbon economy by 2050. We cannot achieve these goals, particularly in downstate New York, without also achieving or exceeding our target of 9,000 MW of offshore wind. The Biden administration has announced plans to tackle climate change and put forth a goal of reaching a net-zero carbon economy by 2050. We must work aggressively to support responsibly-sited renewable energy projects like Sunrise Wind to meet these critical state and federal goals.

All large-scale energy infrastructure projects will have some environmental impact; it is our responsibility to choose the projects with the greatest benefit and the least impact. Climate change impacts have caused significant damage, continue to be a significant threat to our region, and continue to adversely impact our estuaries and our coastal communities. The environmental

benefits of advancing offshore wind farms to reduce climate impacts needs to be weighed against any potential impacts associated with construction and maintenance of offshore wind farms.

CCE believes that offshore wind is one significant part of the antidote in fighting climate change. We cannot and should not put the antidote on pause while allowing impacts of climate change to intensify.

Here in New York, we have heard many myths circulating about potential impacts of offshore wind. To make an informed decision about our energy future we MUST assess the impacts of continuing our reliance on damaging fossil fuels. Opposition to offshore wind has ignored or mischaracterized the scientific consensus about the climate crises and consequential societal impacts. Specifically, there are three issues CCE would like to address.

1. EMFs from cable connections.

Electromagnetic fields (EMFs) are present in offshore wind cables, but they are also present in many existing telecommunication and energy cables, as well as in many of our household appliances. The offshore wind cables are generally buried 3-6 feet underground and encased in 6-12 inches of cement. The cable itself is 8-12 inches in diameter and emits a 60 hz magnetic field at the source. By burying the cable and encasing it in thick concrete, further reduces the EMFs to a level that is not only far below health standards but is, in fact, negligible.

CCE is based on Long Island, where the existing Neptune Cable for example, which carries fossil fuels through Jones Beach and across communities in Nassau County, is one of several very large energy cables that have been in our communities for decades. The US Bureau of Ocean Energy Management finds that “common household items, including television sets, hair dryers, and electric drills, can emit magnetic fields similar to or higher in intensity than those emitted by undersea project power cables” including offshore wind cables.

2. Open-loop cooling systems – Wind vs Fossil Fuel Power Plants

One of the major ecological benefits of offshore wind is offsetting impacts from fossil fuel plants, including impingement and entrainment of fish eggs and larvae. Sunrise Wind would offset the need for the Northport and Port Jefferson power plants, which are two of the three legacy fossil fuel power plants on Long Island. During the DEIS public meetings, concerns were raised about the impact that the cooling system in the Sunrise Wind project would have on fish populations, particularly Atlantic Cod.

According to the DEIS, up to 34,239 individual Atlantic cod larvae could be entrained through Sunrise Wind’s cooling system, which would be the equivalent of 17 adult fish killed per year. In contrast, the Port Jefferson plant is responsible for the entrainment of over 1 billion larvae and impingement of over 75,000 fish. The Northport power plant is responsible for the entrainment of almost 8.5 billion larvae and impingement of over 125,000 fish.

New York’s goal is to replace the antiquated power plants with offshore wind. It is important to understand that substituting the potential marine species impacts by Sunrise Wind’s cooling system, compared to the damage being done currently by the existing cooling systems of our fossil fuel power plants, results in a significant benefit to the marine environment. Ultimately, the Sunrise Wind cooling system would cause substantially less impact than the status quo fossil fuel generation we currently have and would also offset the fossil fuel pollution generated by the Northport and Port Jefferson power facilities, leading to improved water quality and air quality in Long Island Sound.

3. Offshore wind and whales

In 2017 the National Ocean and Atmospheric Administration (NOAA) declared an “unusual whale mortality event” for whales. This designation was based on data that showed a steep increase in deceased whales in 2016 and 2017 washing up on America’s shores. It is important to note that this occurred BEFORE any offshore wind activity ever occurred in NY or NJ. There is dangerous misinformation about offshore wind development and the increase in dead whales on the east coast. This misconception is not based on scientific facts.

- Wind surveys do not kill whales.

When NOAA declared an unusual whale mortality event in 2017 there was no offshore wind project approved in NY or NJ and it was long before offshore wind survey work was conducted. A second misconception is that offshore wind survey work requires the same exploratory equipment as natural gas and oil companies. This is simply not true. Oil and gas exploration requires seismic air guns that penetrate deep into the sea floor. Seismic air guns create one of the loudest man-made sounds in the ocean which damages marine life including whales. The sound can travel several miles through the ocean at 220-250 decibels. Blasts are repeated as often as every 10 seconds for days and weeks. This is not used and not needed for wind surveying work.

Offshore wind surveying uses sound waves known as High Resolution Geophysical (HRG). These surveys use higher frequencies than those used in seismic air guns and image smaller structures with a high level of detail. Additionally, most of the equipment for these surveys cannot be heard by humpback whales. According to the Bureau of Ocean and Energy Management “physical attributes of HRG sources-such as beamwidth, exposure duration, and frequency – make them significantly unlikely to result in harm of marine mammals.”

- What is causing the whale deaths?

Scientists are working to understand the cause of increased whale strandings. The two most common species impacted are Minke Whales and Humpback whales. When whales die, they undergo what is called a necropsy to determine the cause of death. These procedures are challenging when dealing with a 25-ton marine mammal, many of which are in various stages of decomposition. Scientists tell us that Minke Whales are showing signs of infection around the heart area, and 40% of Humpback whales are showing clear signs of ship strikes. Another cause of death is entanglement with commercial fishing gear which weighs down whales, decreases their mobility and ability to feed.

Many scientists believe that whales are here in greater numbers due to changing water temperatures and an increase in bait fish off our shores. The bait fish are a beloved food source for whales, but this food source may be leading whales into shipping lanes making them vulnerable to ship strikes. Also, according to the Port Authority there is a 35% increase in ships from 2019 into New York Harbor, adding another serious threat to whales.

- How do we protect whales?

We know that ship strikes, along with commercial fishing are a real threat to whales. Over 20 environmental groups have called on Congress to allocate \$20 million for better whale monitoring, which would decrease ship strikes, and to fund marine mammal response and necropsy efforts.

One of the greatest threats to not only whales but all wildlife and our oceans is climate change. Warming temperatures, ocean acidification, changing food webs, and altered migration and

feeding habits put whales at greater risk. One thing we can do locally is support the transition from fossil fuels towards renewable energy, which will decrease local ocean acidification in our local waterways, protect local marine species and fisheries, and help combat global climate change. **Offshore wind is the solution, not the problem.**

Our region is on the cusp of securing offshore wind's clean energy benefits. Projects like Sunrise Wind must advance and not be derailed by intentional misinformation or unfounded fears. CCE urges you to follow the science and vote to approve the advance of this important project.

Sincerely,

A handwritten signature in cursive script, reading "Adrienne Esposito".

Adrienne Esposito
Executive Director