Comments by Adrienne Esposito, Executive Director, Citizens Campaign for the Environment

Thank you for the opportunity to comment on the South Fork Wind Energy Farm off the coast of Long Island.

The DEIS is specifically identifies impacts of the South Fork Wind Farm, however BOEM’s decision with this project will have lasting implications for New York’s energy future and our nation’s climate policies. New York State is a leader in the fight against climate change and national champion for offshore wind, having passed the strongest climate change law in the nation in 2019. The state is working towards achieving mandates of 70% renewable energy by 2030, carbon neutral 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 well-sited, responsible renewable energy projects, like the South Fork Wind Farm, to meet these critical state and federal goals.

**CCE thanks BOEM for compiling a thorough and rigorous DEIS for this project. CCE supports the proposed action and urges the agency to move forward with an FEIS and approval of the project by the end of this year.**

Impacts to fish, birds and marine species need to be assessed and mitigated to the greatest extent possible for each offshore wind farm built in the United States. However, the more substantive impact to these species is climate change. The real danger facing our beaches, fisheries, and coastal communities is not a wind farm, it is rising sea levels, ocean acidification, warming waters and extreme weather events. These events are a significant threat to Long Island and already impacting 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 associate with construction of offshore wind farms. CCE believes that offshore
wind is one significant part of the antidote in fighting climate change. We can not and should not put the antidote on pause allowing impacts of climate change to intensify.

**Climate Change Impacts on Long Island**

Long Island is already experiencing the negative ecological and economic impacts of climate change. We need to be at the forefront of the transition to renewable energy and of offshore wind development in the US.

- The National Ocean and Atmospheric Administration (NOAA) predicts under a worst-case scenario a 6 ft sea level rise will cause most of the barrier islands and Long Island homes south of Merrick Road (route 27A) to be flooded or under water, with more than 150 municipalities impacted. Homes and infrastructure are already being raised, including roads in Freeport, Lindenhurst, Smithtown, and Southampton, as well as the Shelter Island ferry, while residents in the most vulnerable communities are facing managed retreat and home buyouts. These communities are in an exceptionally vulnerable position to extreme weather events.

- Superstorm Sandy destroyed or damaged 95,000 buildings on Long Island and caused billions of dollars in damages. We are experiencing the increasing occurrence of “hundred-year storms” and increased precipitation during rain and snow events, and the problem will only get worse. NOAA predicts that in a worst-case sea level rise scenario, the average high tide in NYC will be 2 feet higher than the storm surge during Superstorm Sandy. Costs of repairing damage from extreme weather events like Superstorm Sandy and Hurricane Irene coupled with the need to raise homes and pay increased flood insurance premiums are impacting struggling homeowners in coastal communities. In addition to major storms, south shore communities are already experiencing “sunny day flooding” due to higher tides. This means on sunny day there is still street flooding and property damage.

- Extreme weather events are not our only challenge. Warmer winters coupled with longer, hotter summers are creating more hospitable conditions for invasive species, deer ticks and mosquitoes that carry diseases and reduced agricultural yields. Increased summer temperatures and more severe heat waves also degrade air quality, increase health care costs, and put lives at risk.

- In the US, air pollution from burning fossil fuels leads to annual losses of $600 billion and the loss of 230,000 lives. In NYC, approximately 130 residents die each year just from heat waves, with the number expected to rise over the coming century. Both Suffolk County and NYC regularly receive an “F” for air quality by the American Lung Association and experience disproportionately high rates of asthma, heart disease, and
other chronic health issues in disadvantaged communities. Transitioning to offshore wind will significantly curb air pollution and provide quantifiable health benefits for New Yorkers. Air pollution reductions from the first 2,400 MW of offshore wind in New York would be valued at roughly $1 billion and would avoid an estimated 100 premature deaths each year.

- Ocean acidity has increased 30% since the industrial revolution and there are documented negative impacts to sea scallops, squid, clams, oysters, and other species in the northeast.

- The lobster die off in the Long Island Sound is catastrophic is mainly attributed to warmer waters. The native lobster species and its historic maritime industry declined 90%. The industry used to account for tens of millions of dollars annually.

We are not winning the war to save this planet. In fact, we are losing it. Climate change is altering ecosystems faster than species can adjust. World Wildlife Federation scientists have estimated that most species on this planet (including plants) will have to "move" faster than 1,000 meters (3280 feet) per year if they are to keep within the climate zone which they need for survival. Many species will not be able to redistribute themselves fast enough to keep up with the coming changes. These species may well become extinct.

It is CCE’s strong position that if we are to make decisions that protect birds, shellfish, finfish, and other marine species, then we must support siting offshore wind and we must move forward with the proposed action.

Long Island is faced with the decision whether to lead on renewable energy and embrace wind power, or to stall and remain shackled to fossil fuels. This project, including the construction, operation, and maintenance of the infrastructure associated with it, underwent rigorous environment review. It will set an important precedent for how offshore wind projects are developed in NY, including extensive surveys of marine mammals, consistent and meaningful stakeholder engagement, mitigation plans for commercial fisheries, and a 1 x 1 mile grid system for turbines to minimize impacts to fishing and shipping. We must ensure that future offshore wind projects undergo the same intense study to mitigate environmental and community impacts. But now is the time to act.

The Proposed Alternatives

A “no action alternative” is not a viable option for Long Island’s south fork. The South Fork Wind Farm was selected as the result of an RPF from LIPA to fill a growing need for additional energy on the South Fork of Long Island. A plan is needed to generate more power; therefore, it is not reasonable to present to the public that there a “no action alternative” as a genuine option. The choice was between a wind farm and a new fossil fuel fired power plant. The South Fork Wind Farm was determined to be the best proposal for ratepayers, community members, and our shared environment.
The other alternatives presented will delay or jeopardize the efficacy of the project without creating substantial environmental or community benefits. The Vessel Land Transit Alternative would eliminate Orsted’s ability to construct turbines in the proposed area, handicapping the project. While it may be possible to reduce the number of turbines by using larger turbines capable of generating more energy per turbine, it may also cause delays or hinder the viability of this project. South Fork Wind Farm is advancing in the permitting process and has already experienced delays at the federal level which pushed back its projected date of operation. We cannot continue with added delays.

We applaud the stated intent of the Fisheries Habitat Impact Minimization alternative; however, it is duplicative and unnecessary. Extensive fisheries mitigation efforts and siting surveys have been completed to reduce impacts to marine life, productive ongoing stakeholder meetings continue to further reduce risks to fisheries, birds, and marine mammals, and this additional measure would not create significant additional benefits. In fact, like the transit alternative, it may only serve to further delay this project and hinder our transition to renewable energy, further endangering our wildlife and coastal communities.

CCE recommends the following are included in the DEIS:

1. A section that identifies the adverse impacts of rising sea levels on Long Island already documented including coastal erosion, saltwater intrusion into our aquifer particularly on the east end of Long Island, increased flooding events, the new phenomena called “sunny day flooding” where streets and low-lying areas are flooded on a sunny, calm days, but higher tides cause communities to flood.

2. A section that illustrates the names and quantities of greenhouses gases that will be avoided by building a wind farm to meet the South Fork’s increased energy demand instead of a fossil fuel power plant.

3. A section that identifies the type of environmental monitoring data that will be required. Please identify how this data will be made publicly available. CCE suggests that BOEM create a standardized monitoring protocol for all offshore wind farms in our county. That data should be publicly available on BOEM’s website so that NGOs, Academia, and the public can readily obtain access.

4. A section on the adverse impacts to fishing and shell fishing caused by climate change. This section should include:
   a. Long Island Sound and the South Shore Estuary have experienced a dramatic decline in key recreational and commercial fish species such as the Winter Founder due to warming waters. LIS lobster industry has decreased 90%.
   b. Warmer waters have allowed invasive species to disrupt estuarine ecosystems. The DEIS should discuss the problem associated with invasive species and how fighting climate change can assist in this battle. Invasive species include the European rock shrimp, Asian Shore Crab, Green Crab and Sea Squirt, which are all invaders of the Long Island Sound. These species are extremely competitive and abundant populations have led to the displacement and reduction of native,
coastal species. According to Stephan G. Bullard, Ph.D. “Invasive sea squirts pose a particular threat to Long Island Sound, its organisms, and people living near the Sound. In terms of people, the main problem is that sea squirts heavily foul man-made marine structures such as docks and pilings and boat hulls. During outbreaks, invasive sea squirts reach incredible densities, and there can be hundreds per square foot. Because sea squirts are water-filled and often large (a few inches long), they add a tremendous weight to the structures they cover. For example, Ciona intestinalis has become so abundant in parts of Maine that it can add more than 2.5 pounds of fouling to an area about the size of a human hand. This added weight dramatically increases the weight of lines and gear, and adds massive drag to ships and, subsequently, increases fuel costs. Invasive sea squirts are particularly nasty when they infest aquaculture facilities. They readily foul aquaculture gear and sometimes the aquaculture organism themselves (e.g., they easily grow on bivalve shells). Their weight makes hauling gear much more difficult and it is very hard and time consuming to separate invasive sea squirts from animals like mussels and oysters.”

c. Warmer waters are creating favorable environments for harmful algae blooms including Red Tide, Rust Tide, Brown Tide, Mahogany Tide and Blue Green Algae blooms.

5. NYS DEC will be releasing a new report on Ocean Acidification. This report should be referenced in the DEIS.

It is our responsibility to choose the infrastructure with the least impact and the greatest benefit - and that is the proposed action, South Fork Wind Farm. CCE urges BOEM to move forward with the Proposed Action and issue an FEIS and subsequent approval of the project by the end of this year.