

July 5, 2018

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**Re: Southern Alliance for Clean Energy Comments on Request for Feedback**

Dear Director Cruickshank and Office of Renewable Energy Programs,

The Southern Alliance for Clean Energy (SACE) is a regional organization that promotes responsible energy choices that create global climate change solutions and ensure clean, safe and healthy communities throughout the Southeast. We welcome this opportunity to engage in a thoughtful discussion on offshore energy and thank you for your willingness to accept public input in the Request for Feedback (RFF) on the path forward for Atlantic offshore wind development.

We would like to voice our support for offshore wind energy off the Southeast coast. The Southeastern U.S. coast is home to some of the best offshore wind resources in the country. The relatively shallow offshore waters in our region are ideal for developing wind farms.

This abundant resource represents a huge economic and environmental opportunity over the next several decades. For example, Clemson University found that developing 1 gigawatt of offshore wind energy off of South Carolina's coast would create 3,879 in-state jobs, annually contribute \$366 million in output and \$61.6 million in local and state government revenue.<sup>1</sup> Furthermore, analysis by our organization, the Southern Alliance for Clean Energy, found that offshore wind energy off the coast of North Carolina, South Carolina, and Georgia could provide high-value power at times of peak electricity demand in summer months and mitigate the need for using expensive peaking electricity generating units.<sup>2</sup>

In addition to the ability for offshore wind development to promote economic development in the Southeast, it would also increase our energy security, diversify our region's energy portfolio, reduce global warming pollution, and conserve water resources that would otherwise be used in conventional electricity generation. Moreover, offshore wind energy from the Southeast can help our region achieve the Department of Energy's national vision of generating 20% of its electricity from wind power by the year 2030.

<sup>1</sup> Elizabeth Colbert-Busch and Robert Carey. Clemson University. *South Carolina Wind Energy Supply Chain Survey and Offshore Wind Economic Impact Study*. July 2012. <http://energy.sc.gov/files/WindEnEconImpact7-2012FINAL.pdf>

<sup>2</sup> Southern Alliance for Clean Energy. *Sea Power: How the South's Offshore and Nearshore Winds Can Serve Peak Demand*. August 2013. <http://www.cleanenergy.org/2013/09/13/seapower/>

Due to these many factors, support for offshore wind is generally high in the Southeast. Governor Roy Cooper of North Carolina issued an executive order in support of wind energy in July 2017,<sup>3</sup> the South Carolina Legislature passed a joint resolution in support of offshore wind development in May 2014,<sup>4</sup> and several municipalities along the Southeast coast have adopted resolutions or proclamations supporting offshore wind development, including Carolina Beach, NC, Wrightsville Beach, NC, North Myrtle Beach, SC, Charleston, SC, North Charleston, SC and Tybee Island, GA.<sup>5</sup>

With many compelling reasons to develop offshore wind in the Southeast, we would like to encourage the Bureau of Ocean Energy Management (BOEM) to continue to move forward with leasing area off the coasts of North Carolina and South Carolina. In particular, we wish to support the continuance of moving toward commercial leasing in the wind energy areas and call areas where offshore wind developers have expressed interest. Specifically, we urge the continuation of the processes to consider leases in the Wilmington West and Wilmington East Wind Energy Areas, the Grand Strand, Winyah, and Charleston Call Areas and any other areas nominated by formal calls for nominations, unsolicited nominations, or through this RFF.

An environmental assessment (EA) has already been completed for the Wilmington West and Wilmington East wind energy areas (WEAs) and it found no significant impacts would be caused by the proposed action of issuing leases and site assessment activities for potential future offshore wind energy development. Given the finding of no significant impact (FONSI) for these proposed actions, BOEM should continue to the process of facilitating the proposed action.<sup>6</sup> Given the proximity of the Wilmington West WEA to the Grand Strand Call Area, it does make sense to offer both areas for leasing at the same time.

Following the issuance of the EA, the National Oceanic and Atmospheric Administration (NOAA) expanded the critical habitat designation for North Atlantic right whales to include all of the Wilmington West WEA and part of the Wilmington East WEA.<sup>7</sup> The proposal of this expansion was considered in the EA, however, if any additional consideration for the protection of right whales is potentially necessary as the expansion is now final, BOEM should update the EA and re-issue it along with the forthcoming South Carolina EA.

Viewshed concerns raised by some coastal communities need to be incorporated into the permitting process. These concerns should be addressed in the environmental review of the construction and operations plan (COP), once a potential developer is able to conduct a site assessment plan (SAP), which will help inform where any turbines would be placed, what size of turbines would be proposed, and what kind of lighting strategies would be used.

In South Carolina, where an environmental assessment has not yet been published, progress towards lease issuance seems to have stalled. However the environmental studies that BOEM is currently overseeing to

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<sup>3</sup> Governor Roy Cooper. Executive Order No. 11, "Promoting Wind Energy Development." July 27, 2017. <https://files.nc.gov/governor/documents/files/EO11%20-%20Promoting%20Wind%20Energy%20Development.pdf>

<sup>4</sup> [http://www.scstatehouse.gov/sess120\\_2013-2014/bills/757.htm](http://www.scstatehouse.gov/sess120_2013-2014/bills/757.htm)

<sup>5</sup> Resolutions are attached as an appendix.

<sup>6</sup> Bureau of Ocean Energy Management. *Commercial Wind Lease Issuance and Site Assessment Activities on the Atlantic Outer Continental Shelf Offshore North Carolina Revised Environmental Assessment*. September 2015. <https://www.boem.gov/NC-EA-Camera-FONSI/>

<sup>7</sup> NOAA Fisheries. "NOAA Expands Critical Habitat for Endangered North Atlantic Right Whales." January 26, 2016. [https://www.greateratlantic.fisheries.noaa.gov/mediacenter/2016/january/25\\_noaa\\_expands\\_critical\\_habitat\\_for\\_endangered\\_north\\_atlantic\\_right\\_whales.html](https://www.greateratlantic.fisheries.noaa.gov/mediacenter/2016/january/25_noaa_expands_critical_habitat_for_endangered_north_atlantic_right_whales.html)

survey marine mammals, birds, and turtles<sup>8</sup> will ultimately contribute to a more accurate EA. Therefore it is reasonable that BOEM first incorporate data from these studies into the South Carolina EA prior to any decision of the significance of any environmental impacts from the proposed action of leasing and site assessment off of South Carolina's coast. Since U.S. Wind has expressed interest in the Grand Strand Call Area and we wish for the leasing process to be as streamlined as possible, we recommend that BOEM's environmental studies should be completed, analyzed, and incorporated into BOEM's decision making matrix as soon as possible.

Additionally, we reiterate our support for mitigation measures for the protection of right whales, previously submitted in our comment letter regarding the South Carolina Notice of Intent to Prepare an Environmental Assessment in January 2016:<sup>9</sup>

*We applaud BOEM for setting protection measures for the North Atlantic right whale in the North Carolina environmental assessment and urge continuity in the South Carolina environmental assessment. The South Carolina EA should include the mitigation measures presented in the North Carolina EA as Standard Operating Conditions (SOCs), including vessel strike avoidance measures such as speed restrictions, visibility requirements and protected-species observers (PSOs). In addition, BOEM should seasonally disallow certain activities such as pile driving and other construction activities with heavy boat traffic, as well as high-resolution geophysical and geotechnical surveys, to accommodate the right whales' migration schedule. Such activities should be seasonally limited to when right whales are less likely to be present. Meanwhile, biological surveys specifically designed to aid in the detection of the North Atlantic right whale, as well as other important fauna, should be allowed to proceed year around. Other SOCs to include in South Carolina's EA could include requiring pile-driving technology designed to reduce noise, including vibratory pile driving, press-in pile driving, bubble curtains, cushion blocks, cofferdams, and noise attenuation piles.*

In sum, we support the process BOEM is currently undertaking to offer the Wilmington WEAs with the Grand Strand Call Area in a single lease sale after completing the current round of environmental studies and issuing a data-driven environmental assessment for South Carolina's call areas.

Thank you for the opportunity to comment.

Sincerely,

Chris Carnevale  
Coastal Climate and Energy Manager  
Southern Alliance for Clean Energy  
Charleston, SC

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<sup>8</sup> Bureau of Ocean Energy Management. "Environmental Studies for South Carolina." <https://www.boem.gov/South-Carolina-Environmental-Studies/>

<sup>9</sup> Southern Alliance for Clean Energy et al. Comment Letter "re: Environmental Assessments; Availability, etc. Commercial Wind Leasing and Site Assessment Activities on the Atlantic Outer Continental Shelf Offshore South Carolina, Docket ID: BOEM-2015-0125-0001." January 25, 2016. [http://www.cleanenergy.org/wp-content/uploads/SACE\\_CVSC\\_SCSC\\_Comments\\_on\\_BOEM\\_South\\_Carolina\\_Offshore\\_Wind\\_NOI\\_2016-01-25.pdf](http://www.cleanenergy.org/wp-content/uploads/SACE_CVSC_SCSC_Comments_on_BOEM_South_Carolina_Offshore_Wind_NOI_2016-01-25.pdf)