



Clean Ocean Action

Offshore Wind Policy Statement

Summary:

- Clean Ocean Action (COA) is not opposed to responsible and reasonable offshore wind (OSW) development that supports and sustains a healthy ocean, as proven through recent and peer-reviewed science, good governance, and due diligence based on a pilot-scale project, with ecosystem monitoring and assessments developed, implemented, and evaluated by independent scientists.
- The current, reckless OSW development in marine ecosystems does not meet the above standards, nor has it been weighed against the projects' high need for industrial resources and facilities and unproven potential for reducing greenhouse gas (GHG) emissions.
- Founded in 1984, COA's mission is to protect the ocean from pollution and industrialization, including successfully prohibiting offshore fossil fuel development, using research, education, and citizen action.
- COA builds coalitions of broad interest groups. COA is non-partisan, as are ocean issues, including OSW.
- COA does not accept funds which could cause a conflict of interest with our mission; this includes the fossil fuel and OSW industries, as well as any company seeking permits on which COA will review and comment.

Clean Ocean Action's mission is protecting the ocean. COA has worked for nearly 40 years as a coalition of over one hundred diverse groups and thousands of citizens in a strictly nonpartisan manner to protect the ocean from oil and gas drilling, raw sewage, contaminated dredge material dumping, wood burning, and more. COA has emphasized reducing plastics and runoff pollution as well. Overall, this advocacy greatly improved the health of the ocean, which in turn helps combat climate change, as a healthy ocean absorbs heat and carbon dioxide.¹

Since 2003, COA has participated in good faith in considering the idea of OSW development, including supporting the 2011 Fishermen's Energy pilot project. Reasonable and responsible OSW energy may have a role in reducing climate change if it significantly reduces GHG emissions and is approached with transparency, good governance, scientific integrity, and due diligence, and is based on the "precautionary principle" that a project must be proven to be safe before it is undertaken. To that end, COA has called for a responsible OSW pilot-scale project that, if proven successful, could be combined with comprehensive monitoring systems yet to be developed, which would be tied to strong mandatory, measurable, and enforceable protections for marine life and the ecosystem. Such protections must include guardrails that trigger pauses in development to investigate events, e.g., unprecedented whale deaths. Unfortunately, a commonsense approach to OSW energy development is disappointingly absent.

Instead, the Biden Administration launched an explosive increase of ocean industrialization in 2020, including 30 GW of OSW. The current scope, scale, magnitude, and speed of OSW energy development is an unprecedented industrialization of a critical ecosystem already under stress from centuries of abuse. According to the National Marine Fisheries Service (NMFS), by 2030 the Northeast marine ecosystem alone will be occupied by over 2.4 million acres of OSW energy leases, with 3,400 turbines, 10,000 miles of submarine cables and an additional 5.7 million acres under review for development.² ***Again, this is a never-before-seen scale of human industrial invasion and abuse to an ecosystem.***

Spike in Marine Mammal Deaths:

Between December 2022 and November 2023, 58 dolphins and a record number of 38 whales died in the NY/NJ region. These deaths coincide with unprecedented and extensive OSW development activities, including sonar and seismic surveys which are known to pose risks to marine mammals. This has raised serious and legitimate questions, prompting COA to request a federal investigation with a petition supported by nearly 400,000 people. The request was rejected without evidence to support the agency's counterargument. COA is continuing to research and monitor.

¹ NASA, Global Climate Change: Ocean Warming," December 2022, <https://climate.nasa.gov/vital-signs/ocean-warming/>; NOAA National Ocean Service. "What is Ocean Acidification?" <https://oceanservice.noaa.gov/facts/acidification.html>, as seen 4/20/2023.

² Andy Lipsky, NOAA Fisheries. "Fisheries, Wildlife, and Ecosystem Science in a New Era of OSW Energy Development." NOAA Ecosystem Based Management and Ecosystem Based-Fisheries Management Seminar Series, March 9, 2022, <https://www.youtube.com/watch?v=Dh7yBEDHzL8>.

Additionally, most OSW power plants require multiple offshore transmission sub-stations (OSS) to connect the energy produced offshore to the electric grid onshore. With currently available technology, they will need to use once-through cooling systems³ similar to the ones long opposed by environmentalists for nuclear power plants. Each OSS will pump in billions of gallons of life-rich seawater, impinging and entraining trillions of animals and plankton, including eggs and larvae of many species, which will then be killed with biocides.⁴ Then, the super-heated, contaminated water will be discharged into the sea, creating hot zones. This extensive loss of biomass and temperature changes will likely have serious effects on the marine ecosystem.

Federal and state agencies are fast-tracking OSW leases and projects. Some characterize it as “building the plane while flying it.”⁵ Numerous scientists and studies state that OSW projects are moving faster than science.⁶ Critical research work does not exist for understanding the impacts and implications of OSW energy development, especially the concurrent and **combined impacts** of so many OSW power plants. Also, the complete community and public health impacts from the many **onshore** activities are unspecified, including size and locations of ports and support systems, manufacturing and construction sites, or operation and maintenance activities.

The lack of due diligence, robust science, good governance, and disregard of the precautionary principle has led to hasty and poorly informed decisions. This approach can yield disastrous results, such as extinction of endangered species, loss of fisheries, ecological collapse, and the loss of the coastal culture that sustains this region.

Indeed, the OSW energy industry is in turmoil, experiencing large-scale technological failures, rising costs from macroeconomic shocks, supply chain constraints, and issues connecting to existing grids.⁷ The recent failure of Orsted’s Ocean Wind 1 and 2 projects is a glaring example of how untested the OSW energy industry is in the United States. In addition, radar is impaired by turbines, creating navigational, national security, and safety risks, especially since the region hosts numerous ports including the Port of New York and New Jersey, the busiest port on the eastern seaboard.⁸

With such a gross lack of due diligence, COA celebrates the recent announcement that the Government Accountability Office (GAO) will conduct a cost/benefit analysis of OSW development, which may begin in November 2023. COA advocates for a pause on OSW development until the GAO study is released and recommendations are implemented.

Climate change is real, and actions must be taken now. The cheapest, fastest, safest, and cleanest way to reduce GHG emissions is to reduce energy use and waste.⁹ Additionally, combining onshore renewable energy, green infrastructure, and food waste reduction are more practical and more adaptable than offshore options. Acting rashly in the name of “doing something” for climate change is reckless beyond measure, especially when the action threatens the ocean—the proven and cost-free buffer to climate change.

MORE FOSSIL FUELS THAN WIND?

The Inflation Reduction Act (\$50,265) requires leasing of 60 million acres for offshore oil and gas development prior to any new OSW lease. This may result in any climate benefits from OSW being erased.

COA is not funded by fossil fuel or OSW companies (for the record, fossil fuel companies are most often the same companies developing renewable energy). COA is a non-profit 501(c)(3) organization in good standing; it is ranked and meets the highest standards by two of the nation’s most trusted charity evaluation organizations, Charity Navigator and Candid (GuideStar).

³ Bureau of Ocean Energy Mgmt., *Supporting National Environmental Policy Act Documentation for Offshore Wind Energy Development Related to High Voltage Direct Current Cooling Systems*, OCS Study 2022-023 (Apr. 2022).

⁴ *Id.*

⁵ Comments by NJDEP Commissioner Shawn LaTourette at the “OSW Energy, Climate Change and the Marine Environment Forum” New Jersey Environmental Lobby on October 5, 2021, at Stockton University, Conference recording Part 1: <https://www.njenvironment.org>.

⁶ Will Sennott and Anastasia Lennon, *Blown Away: Fishermen Endangered by Offshore Wind’s Political Power*, ProPublica/New Bedford Light (Apr. 18, 2023), <https://newbedfordlight.org/massive-study-examines-offshore-winds-impact-on-fishing-fisheries/>

⁷ *E.g.*, Eduardo Garcia, *Cost crunch prompts mass rethink of US OSW contracts*, REUTERS (Sept. 13, 2023),

<https://www.reuters.com/business/energy/cost-crunch-prompts-mass-rethink-us-offshore-wind-contracts-2023-09-13/>; John Fialka, *U.S. OSW Needs to Clear a Key Hurdle: Connecting to the Grid*, SCIENTIFIC AMERICAN (Aug. 3, 2020),

<https://www.scientificamerican.com/article/u-s-offshore-wind-needs-to-clear-a-key-hurdle-connecting-to-the-grid/>.

⁸ National Academies of Sciences, Engineering, and Medicine. 2022. Wind Turbine Generator Impacts to Marine Vessel Radar.

<https://doi.org/10.17226/26430>.

⁹ WORLD ECON. FORUM, *This is how cities can reduce emissions with waste-reduction solutions* (Nov. 7, 2022),

<https://www.weforum.org/agenda/2022/11/waste-emissions-methane-cities/>