

# Clean Ocean Action

## Offshore Wind Policy Stance

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**Overarching Policy:** *To ensure all Offshore Wind development in the New York/ New Jersey Bight is done in the most environmentally sustainable manner possible.*

Clean Ocean Action (COA) seeks to connect its longstanding directive to preserve and protect the marine and coastal environment with the urgent need to swiftly transition to a clean energy future to combat catastrophic climate change. Therefore, COA has developed the following policy stance created to ensure that offshore wind development in the New York/New Jersey Bight is done in the most environmentally responsible manner possible. This includes minimizing energy needs through energy efficiency and conservation, as well as increasing onshore renewable generation, to reduce the burden placed on the ocean by offshore wind development. COA will evaluate all individual projects, including cumulative impacts, to ensure offshore wind development meet these standards.

To effectuate this policy, COA will work with all whom have a stake in the development of offshore wind in the New York/New Jersey Bight, including federal, state and local governments and agencies, offshore wind developers and their supply chains, and any entity who can aid in the safe and efficient implementation of offshore wind energy.

It is COA's stance that while offshore wind will play a role in New Jersey's needed transition to a clean energy future, it is not the only answer. Other measures must also be taken to ensure the ocean is not needlessly industrialized based on human energy demands.

Clean Ocean Action's offshore wind platform will therefore rest on the following pillars:

- (1) Protection and enhancement of the ocean environment which provides critical ecosystem and economic services; and
- (2) Prioritization and aggressive implementation of energy efficiency and conservation strategies; and
- (3) An inclusive approach to achieve New Jersey's goal of reaching 100% clean energy by 2050 with an understanding that while offshore wind will play a role, it is not a panacea for our future; and
- (4) Ensuring all offshore development is properly sited to avoid conflict with existing ocean uses and living resources, and will not create additional hazards from navigational impacts; and
- (5) Minimizing impacts on the ocean and coastal environment which cannot be avoided; and
- (6) Working to ensure that all land based facilities and development needed for the offshore wind industry are designed to minimize the overall impact on the natural environment,

are as energy efficient as possible, and are properly sited in environmentally preferable locations; and

- (7) Ensure that the State of New Jersey develops a comprehensive roadmap for the development of 7,500 MW of offshore wind capacity by 2035 that includes a true and fair analysis of the cumulative impacts of multiple offshore wind projects on the marine ecosystem, and mandating that all individual permit decision will be evaluated under this comprehensive plan; and
- (8) Driving policy makers to consider all of the above.

### **Pillar One: Protection and Enhancement of the Ocean Environment.**

The ocean has silently been providing needed climate services for our planet. Reports indicate that the ocean absorbs roughly 26% of all carbon released into the atmosphere, and approximately 90% of the excess heat produced from climate change.<sup>1</sup> However, these vital climate services have come at a cost. Ocean acidification, increased temperatures and deoxygenation have significantly harmed the ocean and weakened the ocean's ability to provide critical ecological services.

Not only does the ocean provide needed ecological services to combat catastrophic climate change, but the ocean is also a significant economic driver. The impacts from climate change and unchecked ocean industrialization threaten the prosperity of New Jersey's clean ocean economy. Estimates show that New Jersey's clean ocean economy produced 9.6 billion annually from tourism, recreation, navigation and fishing. This accounts for roughly 138,000 jobs.

Clean Ocean Action will work to ensure that the ocean and the marine environment are considered first in all decision-making related to offshore wind development. To this end, COA will advocate for robust scientific research before, during and after wind turbine construction. These studies must be made publically available.

### **Pillar Two: Prioritization and Implementation of Energy Efficiency and Conservation Strategies.**

First and foremost, COA will advocate for robust and effective energy efficiency and conservation strategies. To be clear, the solution to our climate crisis is not simply the creation of new energy resources, but is the more efficient use of our energy. As we further develop our ocean, it is essential that we work to create and implement land based solutions to lower our overall electric demand and carbon footprint. Energy efficiency and conservation strategies are underutilized and can achieve significant energy and greenhouse gas reductions limiting the burden placed on our ocean, marine, and coastal environments from offshore wind generation. The Council for an Energy-Efficient Economy (ACEEE) concludes that new efficiencies in

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<sup>1</sup> LuAnn Dahlman and Rebecca Lindsey, *Climate Change: Ocean Heat Content*, U.S. National Oceanic and Atmospheric Association. (Aug. 1, 2018).

transportation, building and industrial sectors can reduce greenhouse gas emissions in the United States by 50% by 2050.<sup>2</sup>

Moreover, energy efficiency and conservation will ensure an equitable transition to renewable energy by lowering electric bills. Currently, New Jersey has the 12<sup>th</sup> highest electricity rates in the nation, and the highest of all states in the PJM interconnect.<sup>3</sup> Adoption of renewable energy and the massive infrastructure needed to support utility scale projects, such as offshore wind farms, will only increase the cost of electricity in the state if development is not coupled with efforts to implement serious energy efficiency and peak demand management programs. A report by the Lawrence Berkeley National Laboratory found that energy efficiency programs funded by utility consumers are the most cost-effective programs for energy and greenhouse gas emission reductions.<sup>4</sup>

COA will therefore focus on the following areas to ensure we systematically lower energy usage through energy efficiency and conservation measures while we continue to transition from fossil fuels to renewable energy resources.

- (1) Aggressive energy efficiency resource standards and targets for utilities
- (2) Time of Use Rates
- (3) Demand Response Projects
- (4) Increase Building Codes
- (5) Incentives for Utilities to Lower Energy Demand

### **Pillar Three: A Holistic Approach to Achieving 100% Renewable Energy.**

The science is clear, if catastrophic climate change is to be avoided, we must swiftly transition from fossil fuels to renewable energy resources. While offshore wind energy will play a role and can provide much needed utility scale renewable generation, it is not the only solution. New Jersey must continue to develop solar and onshore wind resources. While New Jersey has been a leader in the distributed solar installations, more can be done. COA will work to:

- (1) Create more opportunities for distributed solar resources in underutilized areas such as parking lots, brownfields, roadways, warehouses, and dual-use solar on agricultural land; and
- (2) Work to mandate solar on all new large scale developments, something other states like California have already required.

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<sup>2</sup> American Council for an Energy Efficient Economy, *Halfway There: Energy Efficiency Can Cut Energy Use and Greenhouse Gas Emissions in Half by 2050*. (Sept. 18, 2019)

<sup>3</sup> U.S. Energy Information Administration, State Electricity Profiles (January 2018). Available at <https://www.eia.gov/electricity/state/>

<sup>4</sup> See, The Cost of Saving Electricity Through Energy Efficiency Programs Funded by Utility Customers: 2009 – 2015. Energy Analysis and Environmental Impact Division of Lawrence Berkeley National Laboratory. (June 2018). Available at [http://eta-publications.lbl.gov/sites/default/files/cose\\_final\\_report\\_20180619\\_1.pdf](http://eta-publications.lbl.gov/sites/default/files/cose_final_report_20180619_1.pdf)

- (3) Ensure the New Jersey Board of Public Utilities adopts a new pricing mechanism which will make distributed solar more competitive by placing a monetary value on the full range of environmental benefits provided; and
- (4) Seek responsible locations for the development of onshore renewable energy projects; and
- (5) Advocate for policies which will make onshore renewable energy more cost-effective.

**Pillar Four: Ensuring all offshore development is sited to avoid conflict with existing ocean uses and living resources.**

Proper siting of offshore wind resources will be essential to ensuring that the industry is developed in an environmentally responsible way. First and foremost, protections must be given to endangered and threatened species as well as their critical habitat. Offshore wind resources must be sited to avoid harm to marine life and wildlife. Furthermore, siting must be done understanding that the ocean is already home to existing commerce and industry. For instance, our section of the ocean is a central hub for navigation and shipping. The Port of New York and New Jersey is the third largest port in the United States, and the largest on the east coast. Vessels come in and out of the port carrying harmful chemicals and oil. Shipping lanes must be protected and navigational hazards assessed to ensure continued protections to our marine environment. Offshore wind development must not be developed in locations which will increase safety concerns and result in potential harm to the environment through spills and accidents. On top navigation, the NY/NJ Bight is home to a vibrant recreational and commercial fishing industry. Decisions related to the siting of offshore wind development must utilize the wealth of specialized knowledge this community has related to living resources, navigational hazards, and our ocean ecosystem to determine the most environmentally sound locations for development. Furthermore, siting decisions must include an evaluation to the impacts to the fishing community including assurances of continued access.

Only sites which have minimum or no conflicts should be utilized. To implement this pillar COA will:

- (1) Engage with the Bureau of Ocean Energy Management on the selection of potential offshore wind energy areas and offshore wind energy leases; and
- (2) Leverage our history of environmental excellence in the NY/NJ Bight and along the Jersey Shore to ensure our vast network of stakeholders are included in all siting decision-making processes to provide informed input to relevant decision makers.
- (3) Consider potential options to minimize environmental impacts such as backbone centralized transmission as opposed to project specific transmission. Any backbone transmission line must only be used to carry clean, carbon-free electricity.

### **Pillar Five: Minimize Impacts Which Can Not be Avoided**

While COA will work to demand that all aspects of offshore wind development account for the marine and coastal ecosystem, we understand that some conflicts may not be fully avoidable. To this end, COA will work to demand that these unavoidable impacts are minimized to the fullest extent possible.

### **Pillar Six: Environmentally Responsible Development of Onshore Resources**

Thus far, the offshore wind energy discussion in New Jersey has primarily focused only on the impacts to offshore resources. However, it is important to remember that when we talk about offshore wind development, and the 7,500 MW goal the state has committed to, we are also talking about the development of a completely new and coastally dependent industry. Offshore wind will require significant onshore development ranging from operation and maintenance facilities, staging ports, and construction sites for foundations, turbines, and other necessary components.

Therefore, COA will work to direct that all onshore development necessary for the offshore wind industry is sited in the most environmentally preferable locations. We will also work to demand that the offshore wind industry develops all facilities in the most energy efficient manner to lower carbon emissions. Finally, given that New Jersey is the most densely populated state in the nation, we will work with the offshore wind industry to ensure that all development is created with as small a footprint as possible.

### **Pillar Seven: Ensure that the New Jersey Develops a Robust Offshore Wind Strategic Plan.**

With the vast nature of the undertaking of developing the offshore wind industry within New Jersey, it is COA policy that a comprehensive and overarching plan which focuses on the total buildout of 7,500 MW of offshore wind is created. COA finds it unacceptable that New Jersey awarded the first of three offshore wind solicitations before the completion of the Offshore Wind Strategic Plan.

Through the New Jersey Offshore Wind Strategic Plan, COA will work to ensure that all decisions consider and evaluate the cumulative impact on marine resources and the coastal zone, every step of the way. While each project should be robustly analyzed in and of itself, these projects are not occurring in a vacuum. Each project is being developed in close proximity to one another. The impacts of developing not just one offshore wind farm, but multiple in a small geographic radius of the ocean must be understood.

COA will work to ensure that all permitting decisions are made in accordance with the overarching plan. Specifically we will work to:

- (1) Mandate a cumulative impact analysis for all offshore wind projects; and

- (2) Where feasible, require shared facilities to lower the overall onshore footprint of the offshore wind industry; and
- (3) Require interagency co-operation within New Jersey; and
- (4) Require coordination between New York and New Jersey.

**Pillar Eight: Driving Policy Makers to Consider All of the Above**

The development of the offshore wind industry in the NY/NJ Bight area will require the coordination of local, state, and federal elected officials and agencies. There is no singular focal point for the responsible development of offshore wind in our region. Therefore, COA will work to engage with policy makers at all levels to ensure our criteria for the environmentally sound development of offshore wind is achieved.