

BOEM Virtual Hearing, Supplement to the Vineyard Wind Draft Environmental Impact Statement

Prepared remarks of John Rogers, Union of Concerned Scientists

July 2, 2020

Thank you very much for the chance to speak this evening. My name is John Rogers, and I am a senior energy analyst at the Union of Concerned Scientists. UCS “puts rigorous, independent science to work to solve our planet’s most-pressing problems.” That includes our work in the power sector, and that’s why we appreciate BOEM’s efforts and thoroughness, and the opportunity to comment tonight on the Supplemental EIS.

What brings me here is not a single project, but the chance to comment based on the broad scope of the SEIS, and all the projects that it encompasses. As I expect you fully realize, offshore wind offers exciting prospects:

- It can offer large amounts of pollution-free generation, which many states, including along the Eastern seaboard, are demanding. That matters for reducing air pollution from fossil fuel power plants that affects, in particular, the often-marginalized communities that abut those plants. And it matters for reducing climate change’s harmful impacts—including on the marine environment and all that depends on it.¹
- Offshore wind generates at times that make it an excellent complement to other renewable energy resources, including because of its strength in winter.
- Offshore wind can offer savings to electricity customers, thanks to the strong cost reductions that the industry has achieved, which are themselves thanks in part to the strong state policies that have prompted larger projects and offered economies of scale.

¹ In this regard, this SEIS’s conclusion regarding air pollution (p. A-43) is notable:

The proposed Project and other future offshore wind projects will in fact probably lead to reduced emissions from fossil fuel power-generating facilities and benefit air quality. Under the No Action Alternative, additional, more polluting, fossil fuel energy facilities would come or be kept on-line to meet future power demand, fired by natural gas, oil, or coal.

Also noteworthy is the text immediately following, in which BOEM suggests that the fossil impacts from not having built the first large-scale offshore wind project in US waters “would be mitigated partially by other future offshore wind projects surrounding the proposed Project area” (p. A-44). Yet it challenging to envision subsequent offshore wind projects succeeding in the near term if a first project failed to proceed not because of its merits but because of the lack of such a smooth, science-based process—hence the importance of this proceeding (as noted below).

- And offshore wind can offer economic development and jobs, with the creation of an entirely new industry, with all the project study, development, installation, maintenance, manufacturing, finance, and more that the industry entails. That job creation potential seems particularly important with high unemployment and an economy in need of rebuilding.

All of those benefits depend on having a smooth, science-based regulatory process, for good decision making. So it's very encouraging to have the BOEM SEIS out for comment. And especially encouraging to see that the SEIS found relatively low impacts even with its consideration of a substantial collection of offshore wind projects, far beyond the one project that has been the focus of this BOEM process.

One area of consideration deserves particular attention and comment: The spacing and layout of the turbines. When the five New England leaseholders proposed to adopt a uniform 1x1 turbine layout, the same east-west/north-south orientation, that was a solid response to many of the concerns expressed about the prior plans and navigation through the projects. And in its recent MARIPARS study, the US Coast Guard confirmed the appropriateness of that spacing.

But spacing the turbines so much farther apart also appreciably reduces the number of turbines and generation possible in the lease areas; Vineyard Wind estimated a 13,000-megawatt reduction for the New England lease areas, with a 30% reduction in potential clean energy.

So we voice our strong opposition to the SEIS's Alternative F, which would require additional transit lanes beyond the hundreds provided by the 1x1 fixed orientation layout. Alternative F would lead to a lot more lost potential. Fewer megawatts and less generation would mean more air pollution impacts from the fossil fuel generation that those turbines could have displaced, less savings on electricity bills, fewer opportunities for economic development and jobs, and a heightened impact on marine wildlife from the worsening impacts of climate change.

None of those should be acceptable outcomes, and we ask you to reject Alternative F in particular.

In my almost three decades of working in the power sector, I have never seen an opportunity like we're seeing now with offshore wind. The lengthy process to date, and now a strongly supportive SEIS, provide a strong basis for moving forward, with appropriate attention to mitigation. What comes of this process isn't about just one project; it's about every project in the queue behind it, and about fidelity to science, and facts, and good decision making.

After years of consideration of offshore wind in these parts, it's time for us to act, and to begin to realize the tremendous benefits of offshore wind. So thank you for all you have done, and for all that is yet to come.