



August 17, 2006

Mr. Doug Slitor
Minerals Management Services MS 5412
1201 Elmwood Park Blvd.
New Orleans, LA 70123

RE: Comments on EIS Scoping for the LIOWP Project

Dear Mr. Slitor,

Citizens Campaign for the Environment (CCE) is an 80,000-member, non-profit, non-partisan, advocacy organization working to protect public health and the natural environment in New York State and Connecticut. CCE works to build widespread citizen understanding and advocacy for policies and actions designed to manage and protect land and water resources, wildlife and public health.

CCE is very active in promoting policies and actions at the local, state, and federal level that support the development and use of renewable energy, which is derived from sources that are not depleted when used at sustainable levels. Today we face dwindling supplies of traditional energy sources; substantial increases in oil and gas prices, and significant pollutants that have an adverse impact on human health and the environment. America must look towards alternative energy sources to meet our rising energy demand.

CCE believes that we need to increase our use of renewable energy throughout Long Island, New York, and the Nation. **CCE believes that a rigorous environmental review should be conducted.**

CCE offers the following comments, which need to be addressed in the Environmental Impact Statement (EIS) for the Long Island Offshore Wind Park:

General Comments -

In general CCE believes that the EIS should contain a discuss of the impact of wind power in the following areas:

Wind power is emission free. In contrast to coal, oil, and gas plants, wind facilities do not burn fossil fuels and thus do not produce air pollution. Wind power does not require

millions of gallons of water each day for cooling purposes, like fossil fuel and nuclear plants. Wind power is a commercially available, proven clean technology.²

Wind power is independent of imported fuels. Once constructed, a wind facility requires no fuel. This reduces our dependence on imported oil and gas, much of which comes from unstable areas of the world. In times of rising and volatile fuel prices, domestic power production can hedge price fluctuations, increasing energy diversity and security.

Wind power keeps energy dollars at home. Buying coal, oil, and gas sends New York dollars out of state and out of the country. In contrast, wind power keeps more of those dollars in state. Investment in wind power can boost New York's growing renewable technologies industries.

Wind power helps stabilize energy prices. By further diversifying the ways we produce electricity, wind power can help stabilize energy prices. Even a small drop in the demand for natural gas, for example, will bring down the price. This results in more price stability and lower overall energy costs.

Studies indicate that wind farms do not adversely impact property values in their view shed. While many have voiced concerns about a potential adverse impact of wind farms on local property values, studies show that this is not the case. A study by the Renewable Energy Policy Project (REPP) looked at the property values of homes in the view shed of wind farms throughout the country. The report concluded that the property values of the homes in the view shed of the wind farms actually go up faster than values in the comparable region, as was the case at the Fenner wind farm in Madison County, NY. A recent study by Bard College found no measurable effect of windmill visibility on property values near the Madison County wind farm.

Increased use of wind power will reduce CO2 emissions. Fossil fuel production releases devastating carbon dioxide emissions, which are a major contributor to global climate change. **Global climate change is one of the greatest threats to our world's oceans.** Right now we are seeing sea level rise, the bleaching of coral reefs, greater intensity of hurricanes, high mercury levels in fish and a dramatic increase in the acidity level of our ocean waters. The EIS should discuss the negative economic, public health, societal and geopolitical impacts caused by the continued reliance on fossil fuels. This critical discussion should include how domestically and emission free wind power can help alleviate these devastating impacts.

Specific Comments for Long Island Offshore Wind Farm Proposal

- 1. An assessment of any possible “reef effect” that might occur around the infrastructure.**

This study should include both the pros and the cons of an artificial reef system as it relates to specific species and to the local economy. Studies in Europe,

particularly Denmark¹, have shown that the seabed foundations have created artificial reefs that attract new species to colonize and provide a haven for deep-ocean and fish populations.

The foundations of offshore wind turbines can function as an artificial community providing hard-bottom on an otherwise sandy bottom. The impact on the fish fauna can either be through increased productivity or simply through attraction. For example, codfish and flatfish are attracted to underwater structures and may become a new resource for fishermen.¹

The artificial reef benefit has also been found to benefit birds. A wind conference in November of 2004 concluded that Danish wind farms had actually benefited the local environment because birds were simply flying over or around the packs of turbines and used the artificial reefs as a new source of food.²

2. The EIS should address any positive/negative effects the proposed project would have on the economy. This should include tourism, commercial and recreational fishing, and beach activities.

The EIS should look into the potential for increased tourism in the area. For instance, in Denmark, the leading country in the world in utilizing and exporting wind generating technology, studies indicate that they experienced a 25% increase in tourism, generated by the wind turbines that are scattered around the country³, in harbors and offshore. Popular beachside vacation spots experienced no losses in rental revenues and business continued to thrive. It has also been found that the Esperance Wind Farms in Esperance Bay, Australia regularly attracts over 150,000 visitors every year.⁴

Fenner Wind Farm, located in Madison County, New York, has also seen an increase in tourism. The town estimates that thousands of visitors pass-through yearly to visit the wind turbines. They town has begun to construct a “visitors center” with informational and interpretive kiosks, a walking trail, restrooms, visitors parking lot, and eventually a LEED-certified visitors center to accommodate the visitors.⁵

¹ Astrup, J., Hoffman, E., Larsen, F., Munch-Petersen, S., Stottrup, J.. (2000) *Effects of marine wind farms on the distribution of fish, shellfish and marine mammals in the Horns Rev area* (Baggrundsrapport nr. 24). Charlottenlund, DK: Danish Institute for Fisheries Research, [15 June 2006]

http://www.hornsrev.dk/Miljoeforhold/miljoerapporter/Baggrundsrapport_24.pdf

² *Birds not being killed by windfarms-Ecologist*. Planet Ark News, 26 November 2004: Online.

<http://www.planetark.com/dailynewsstory.cfm/newsid/28293/story.htm>

³ <http://www.cleanpowernow.org/modules.php?op=modload&name=Sections&file=indez&req=viewarticle&artid=15>

⁴ AusWEA and Wind Prospect Fact Sheet. *Frequently Asked Wind Energy Questions*. Online.

<http://www.windprospect.com.au/downloads/FAQs%20v2.pdf>

⁵ <http://www.townoffenner.com/freecenterbrochure.pdf>

3. An assessment of bird migration pathways surrounding the proposed location of any project.

Bird surveys should be conducted for each project. The EIS should evaluate both positive and negative effects that the renewable infrastructure might have on bird populations. These effects should be compared to the impacts on birds caused by emissions from a fossil fuel generating facility of equal energy capacity on land.

4. The EIS needs to assess the positive/negative/negligible impact of turbine noise on the marine and avian ecosystem.

This should also include a comparative study that looks at turbine-generated noise in relation to watercrafts such as boats, barges, jet skis, and other recreational and commercial uses already present on the ocean ecosystems. Studies in Europe have shown that marine life is not affected by minimal wind turbine humming because of their constant exposure to other underwater noises.⁶ The EIS should look at these studies as well as conduct site-specific noise studies for the area.

5. An assessment of the environmental and public health benefits as compared with a fossil fuel plant of equal generating capacity.

The Offshore Wind Farm would generate zero harmful emissions as compared to a plant burning oil/natural gas that would release Sulfur Dioxide, Nitrogen Oxide (both components of smog), and Carbon Dioxide. All three are greenhouse gases, contributors of global warming.

A comparative assessment needs to be done that should include both the benefits/impacts to the surrounding environment and to the public health.

The EIS should also include the amount of pollutants that would be displaced by 44,000 homes using wind energy. These pollutants should include sulfur dioxide, nitrogen oxide, particulate matter, mercury and carbon dioxide.

Nassau and Suffolk County do not meet the federal air quality standards for ozone and fine particulate matter.⁷ Ozone is the main ingredient in smog. High levels of ozone can result in chest pain, congestion, and coughing. The EPA estimates that 10 to 20 percent of all summertime respiratory-related hospital visits in the northeastern U.S. are associated with ozone pollution. Children are most at risk from this type of pollution because they breathe more air per pound than adults and their respiratory systems are still developing.⁸

Fine Particulate Matter or PM 2.5 has been linked with premature death, heart attacks and many lung-related ailments. A very recent study has found that high

⁶ http://www.edp24.co.uk/Windfarms/asp/implications/Constraints_D2.asp

⁷ <http://www.epa.gov/air/data/nonat.html?Us~USA~United%20States>

⁸ <http://www.epa.gov/ttn/oarpg/naaqsfm/o3health.html>

levels of PM 2.5 in the air pose the same risk for lung cancer as a non-smoker faces living with a smoker.⁹

The EIS should include an evaluation on how/if the offshore Wind Park can be part of Nassau's and Suffolk's plan to come into compliance with mandatory federal health standards. The EIS should also include an evaluation on the possible positive health benefits that would be achieved by the generating energy that does contribute to dangerous pollutants such as ozone, smog, and particulate matter.

6. The EIS needs to include an analysis of how displacing harmful pollutants can have positive affects on the ocean ecosystem.

The EIS needs to review the estimated displacement of pollutants in the course of twenty years of: 9,780 tons of nitrogen oxide and 4,420 tons of sulfur dioxide and how this displacement effect ocean warming and the health of local estuary water bodies including South Shore Estuary Reserve, Long Island Sound and the Peconic Estuary. Currently, throughout Long Island water bodies, there are trends of decreasing cold-water fish populations and increasing warm water fish populations. The continuation of this trend could have severe negative impacts on economically important cold-water species such as lobster and winter flounder.

7. The EIS should assess whether the project helps to meet State, Regional, or National regulations, codes, or laws.

This should include the NYS Renewable Portfolio Standards, which states that New York must have at least 25% by 2013 of its electricity sold to consumers generated by renewable resources. To meet this goal, it is estimated that NY has to add 3,700 MW of renewable resource generation capacity.¹⁰

It should also take into account Executive Order 111, which requires NYS to purchase 20% of its electricity, used throughout state buildings, from renewable resources.¹¹

It should also be noted that both Nassau and Suffolk County has agreed to purchase 25% renewable energy, specifically wind energy, by the year 2010. Many towns, villages, businesses, and homeowners have also begun to purchase

⁹ "Link Strengthened Between Lung Cancer, Heart Deaths and Tiny Particles of Soot, Dust: Press Release." National Institute of Environmental Health Sciences. 5 March 2002.
<<http://www.niehs.nih.gov/oc/news/lchlink.htm>>

¹⁰ "PSC Votes to Adopt Aggressive Renewable Energy Policy for NYS-Goal to increase Renewable Energy Purchases from 19 percent to 25 percent by 2013:Press Release." State of New York Public Service Commission. 22 September 2004.

¹¹ "Executive Order No. 111 "Green and Clean" State Buildings and Vehicles Guidelines" December 2001.

wind energy on Long Island. It is beneficial for the wind energy to be generated locally.

8. An assessment of any potential impact to Horseshoe Crabs of the Atlantic Coast.

The Horseshoe Crab habitat ranges from Maine to the Gulf of Mexico. They are most abundant from Virginia to New Jersey. Adults spend fall and winter at the bottoms of bays or on the continental shelf.

9. An assessment of the migration patterns for sea turtles and marine mammals including but not limited to whales, dolphin and seals.

10. Studies should be done to characterize the bottomlands of the intended location of the project. In specific, the productivity of these bottomland as they relate to commercial and recreational fish and shellfish harvesting as well providing habitat for marine life. The EIS should look at short-term and long-term effects.

11. The effects of increased/decreased sand deposition caused by the turbine infrastructure. Sand deposition is critical to Long Island's barrier beaches.

12. Wave activity. The review must address how or if the proposed wind park may impact/displace wave activity including size, force and frequency of the activity.

13. Public Input. The DEIS should include ample public opportunities in the form of informational meetings, public hearings, and public comment periods.

CCE understands both the importance of reducing our dependence on fossil fuels and the significance of protecting our marine environment. We must find a balance in which our marine environment is protected and our dependence on fossil fuels is reduced. Offshore Renewable Energies has the promise to accomplish both of these critical needs. Thank you for this opportunity to comment.

Sincerely,

Adrienne Esposito
Executive Director

Maureen Dolan-Murphy
Program Coordinator