

**CITIZENS
CAMPAIGN**
FOR THE ENVIRONMENT



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Protecting the environment and working for a healthy community.

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MMS Renewable Energy and
Alternate Use Programmatic EIS Scoping
Argonne National Laboratory
9700 S. Cass Ave.
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To whom it may concern:

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, since its inception in 1985, has also been working to protect water quality across New York State and throughout the Nation. Currently, CCE actively works on protecting many of New York's largest and often most impacted waterways including the Hudson River, the Long Island South Shore Estuary Reserve, the Great Lakes, the Finger Lakes, the Peconic River, and Long Island Sound. Additionally, CCE is an active member of the Long Island Sound Study Citizens Advisory Committee and the South Shore Estuary Reserve Citizens Advisory Committee.

CCE believes the development of all offshore renewable energy, including but not limited to offshore wind technology, wave technology, and under water current technology, can be an important energy source for America. However, the development of these energies must undergo a site-specific rigorous environmental review process. The process must be comprehensive and include public participation.

CCE offers the following specific comments, which need to be addressed by an Environmental Impact Statement (EIS) for offshore energy alternatives:

1. The review must address how or if the proposed offshore renewable energy project will impact/displace wave activity including size, force and frequency of the activity.
2. Studies should be done to characterize the bottomlands of the intended location of a proposed 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.
3. The effects of increased/decreased sand deposition caused by the energy infrastructure. Sand deposition is critical to Long Island's barrier beaches and as well as so many other coastal states.
4. 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.
5. 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.
6. An assessment of the environmental and public health benefits as compared with a fossil fuel plant of equal generating capacity. This assessment should include any positive effects on air quality and any displacement of fossil fuel production. This should also include an assessment of whether the proposed location meets the federal air quality standards for ozone and fine particulate matter and how the renewable energy might effect compliance to these mandatory federal health standards.
7. 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.
8. An assessment of the migration patterns for marine mammals including but not limited to whales, dolphin and seals. In addition, sea turtles.
9. The EIS should assess whether the project helps to meet State, Regional, or National regulations, codes, or laws. This should include any state Renewable Portfolio Standards, Executive Orders, or participation in regional initiatives, such

as ICLEI (Local Governments for Sustainability) or RGGI (Regional Greenhouse Gas Initiative).

10. 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.
11. The EIS 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. 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. 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.

Each project should be evaluated on a site-specific basis, with site-specific studies. Each project should follow an open process and include public participation. Each project should undergo a rigorous environmental review process.

Thank you for this opportunity to comment.

Sincerely,

Maureen Dolan Murphy
Program Coordinator