



## OFFSHORE WIND ENERGY FREQUENTLY ASKED QUESTIONS

*What We Know About Orsted's Skipjack Project*

As the offshore wind industry expands in U.S. waters, it's important to understand both the benefits and impacts offshore wind farms can have on our marine environment, coastal economies, and recreational use areas. Though the Surfrider Foundation (Surfrider) generally encourages the use of renewable energy to prevent the dangerous threats to our coasts and ocean from exacerbated climate change and fossil fuels, offshore wind farms need to be designed carefully to prevent negative ecological, economic and recreational impacts. At this point in the project, Surfrider is most concerned about the impacts to marine wildlife, consideration of cumulative impacts, and need for increased public engagement.

Surfrider is not affiliated with this offshore wind farm proposal, but due to the project's potential to directly impact nearby coastlines and coastal communities, Surfrider developed this list of common inquiries. Answers were assembled by Surfrider staff with help from experts on coastal resources and offshore wind energy. The Block Island Wind Farm is referenced often, as it is the only commercial offshore wind farm currently operating in the U.S. If you have additional questions, please contact Matt Gove at [mgove@surfrider.org](mailto:mgove@surfrider.org).

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## APPROVAL PROCESS QUESTIONS

### 1. What is Orsted's Skipjack Project?

A proposed offshore wind power generating project that would place around 10 wind turbines about 19.5 miles offshore from the Delaware/Maryland border, 25 miles from

Ocean City, and 18 miles from Delaware.<sup>1</sup> Orsted has decided to use 12MW (megawatt) Haliade turbines for the project, standing about 850 feet above the waterline. The project intends to power 36,000 typical homes, which could help Maryland achieve its goal of 25% renewable energy by 2020. “Skipjack Wind Farm” is the official name of the project, and Orsted (Orsted bought out Deepwater Wind in 2018) is the name of the private company proposing the project. Orsted plans to connect the project to the energy grid on land somewhere on the Delmarva Peninsula, adding up to 120 MW of power to the electricity grid. Orsted is planning to begin a one year construction process in 2021-2022 if approved. The rights to propose development of wind power generating projects in the lease area were purchased from Garden State Offshore Energy (GSOE) in June, 2018.<sup>2</sup> GSOE purchased the development rights in November 2016 from Bluewater Wind Delaware.<sup>3</sup> Bluewater Wind Delaware purchased the development rights in December, 2012 from the federal government. The project would be designed to operate for 20 years.<sup>4</sup>

## **2. What is Surfrider’s role in these proposed offshore wind projects?**

Surfrider is not affiliated with the development of offshore wind projects, yet consistent with Surfrider’s mission to protect and enjoy ocean, waves and beaches, Surfrider’s role is to ensure that coastal and ocean ecosystems and sustainable human uses are protected. We have an [official policy](#) about renewable ocean energy development that lays out what Surfrider wants to see in a proposed project. Surfrider is not looking at these projects in a vacuum, but weighing the impacts from offshore wind development with the impacts from climate change. As these projects move forward, Surfrider will provide facts, facilitate dialogue between stakeholders, government agencies, and project developers, and provide public comment on relevant documents to ensure that projects are designed and implemented in a way that protect coastal resources, marine life, and recreation opportunities.

## **3. What agencies and governments must approve an offshore wind project?**

Offshore wind projects generally require the approval of federal, state, and local government agencies and bodies. Federal government agencies have authority past three miles from shore, but power cables will need to cross state lands and waters,

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<sup>1</sup> Orsted. Skipjack Wind Farm. *Available at:* [dwwind.com/project/skipjack-wind-farm](http://dwwind.com/project/skipjack-wind-farm)

<sup>2</sup> BOEM. Assignment of record title OCS-A 0482. June 2018. *Available at:* [www.boem.gov/Assignment-to-Skipjack-Offshore-Energy/](http://www.boem.gov/Assignment-to-Skipjack-Offshore-Energy/)

<sup>3</sup> BOEM. Assignment of record title OCS-A 0482. December 2016. *Available at:* [www.boem.gov/Assignment-of-Lease-OCS-A-0482/](http://www.boem.gov/Assignment-of-Lease-OCS-A-0482/)

<sup>4</sup> BOEM. November 2012. Commercial Lease of Submerged Land For Renewable Energy Development On the Outer Continental Shelf. OCS-A 0482. *Available at:* [www.boem.gov/uploadedFiles/BOEM/Renewable\\_Energy\\_Program/State\\_Activities/Executed%20Lease%20OCS-A\(1\).pdf](http://www.boem.gov/uploadedFiles/BOEM/Renewable_Energy_Program/State_Activities/Executed%20Lease%20OCS-A(1).pdf)

requiring state approval. States also have some authority beyond three miles offshore through the Coastal Zone Management Act, which could allow them to stop wind projects.<sup>5</sup> Local permits may also be required when power cables come ashore. The [Bureau of Ocean Energy Management](#) is the lead federal authority for renewable energy on the Outer Continental Shelf, and the [Army Corps of Engineers](#) is the lead federal agency concerning project siting in the Great Lakes. Other federal agencies weigh in with scientific information and other information like [National Oceanic and Atmospheric Administration](#) (NOAA), [U.S. Department of Defense](#) (DOD), [U.S. Department of Energy](#) (DOE), [U.S. Coast Guard](#), and [U.S. Fish and Wildlife Service](#) (USFWS).<sup>6</sup>

#### 4. How can the public be involved?

BOEM has a few different public engagement opportunities throughout its offshore wind permit process. Generally, the public can comment when BOEM designates an official Wind Energy Area offshore. A second opportunity occurs when BOEM leases that area to energy companies. A third and fourth opportunity is when a company submits a “Site Assessment Plan”, and then finally, a “Construction and Operation Plan”.<sup>7, 8</sup> Contact Matt Gove, Surfrider’s Mid Atlantic Policy Manager, for more information about engaging in the public process for this and other offshore wind projects in the Mid Atlantic Region: [mgove@surfrider.org](mailto:mgove@surfrider.org).

#### 5. Why now and why Maryland/Delaware?

Offshore wind energy development has been successful in Europe for decades, and has been increasingly discussed as a solution to carbon pollution in the U.S.<sup>9</sup> The negative effects and increasing threats of climate change are pushing states to reduce their reliance on fossil fuels, and invest in renewable power. The U.S. East Coast is an economically attractive location for offshore wind energy due to the high winds offshore and large populations that live near the coast.<sup>10</sup> Since Maryland has an agreement to

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<sup>5</sup> NOAA. 2018. Coastal Zone Management Act. NOAA Office for Coastal Management. *Available at:* [coast.noaa.gov/czm/act/](http://coast.noaa.gov/czm/act/)

<sup>6</sup> Federal Register. Renewable Energy Program Regulations (30 CFR 585). *Available at:* [www.boem.gov/uploadedFiles/30\\_CFR\\_585.pdf](http://www.boem.gov/uploadedFiles/30_CFR_585.pdf)

<sup>7</sup> BOEM. 2016. A citizen’s guide to the Bureau of Ocean Energy Management’s Renewable Energy Authorization Process. *Available at:* [www.boem.gov/KW-CG-Broch/](http://www.boem.gov/KW-CG-Broch/)

<sup>8</sup> BOEM. Fact Sheet: Wind energy commercial leasing process. *Available at:* [www.boem.gov/Commercial-Leasing-Process-Fact-Sheet/](http://www.boem.gov/Commercial-Leasing-Process-Fact-Sheet/)

<sup>9</sup> Gilman, P., Maurer, B., Feinberg, L., Duerr, A., Peterson, L., Musial, W., Beiter, P., Golladay, J., Stromberg, J., Johnson, I., Boren, D. & Moore, A. 2016. National offshore wind strategy: Facilitating the development of the offshore wind industry in the United States. US Department of the Interior & Department of Energy. *Available at:* [www.boem.gov/National-Offshore-Wind-Strategy](http://www.boem.gov/National-Offshore-Wind-Strategy)

<sup>10</sup> Gilman, P. et al. 2016. National offshore wind strategy: Facilitating the development of the offshore wind industry in the United States. US Department of the Interior & Department of Energy. *Available at:* [www.boem.gov/National-Offshore-Wind-Strategy](http://www.boem.gov/National-Offshore-Wind-Strategy)

pay for the energy from the Skipjack project, it would help Maryland reach its goal of having 25% of the state's electricity sourced from renewable energy by 2020.<sup>11</sup>

## **6. Why don't we just put the turbines on land?**

The main benefits to placing turbines offshore instead of on land include access to higher wind speeds and more open space. Higher and more consistent wind speeds are available offshore, which means offshore production can generate greater amounts of electricity per turbine.<sup>12</sup> Onshore and offshore turbines require a lot of open space, which can be difficult to find in densely populated coastal areas. Additionally, setback rules between private property and wind turbines make finding sufficient space for wind farms on land even more difficult, as many people do not want wind turbines close to where they live.<sup>13</sup> Compared to solar energy, one 10MW offshore wind turbine produces the same amount of energy as about 50 acres of land based solar panels.<sup>14</sup>

## **7. What kind of scientific studies are being done to record data about the ecosystem before and after installation of these turbines?**

Orsted must gather baseline environmental data in the proposed development area (as required by the National Environmental Policy Act and other regulations). The Bureau of Ocean Energy Management (BOEM) is also continually funding research on the effects of wind turbines on their surrounding ecosystems. For example, BOEM is researching a whole host of topics in regards to offshore wind, including the effects of electromagnetic fields on elasmobranchs (sharks, rays, skates); effects of supporting infrastructure on wildlife like birds, bats, and fish, as well as cultural and archaeological resources; and behavioral effects of sound sources on marine mammals and other protected species.<sup>15</sup> For the Block Island Wind farm, Deepwater Wind collected scientific information two years prior to the construction of the turbines, two years

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<sup>11</sup> Maryland Public Service Commission. Renewable Portfolio Standard. *Available at:* [www.psc.state.md.us/electricity/renewable-energy/](http://www.psc.state.md.us/electricity/renewable-energy/)

<sup>12</sup> Kaldellis, J.K. & Kapsali, M. 2013. Shifting towards offshore wind energy- Recent activity and future development. *Energy Policy*: Vol. 53, Pp. 136-148. *Available at:* [www.sealab.gr/download/attachments/15565224/Shifting+towards+offshore+wind+energy--Recent+activity+and+future+development.pdf?version=1&modificationDate=1397224788000](http://www.sealab.gr/download/attachments/15565224/Shifting+towards+offshore+wind+energy--Recent+activity+and+future+development.pdf?version=1&modificationDate=1397224788000)

<sup>13</sup> WOSU editor. 2017. Citizens debate rules on distance between wind farms and their property. WOSU Public Media, The Ohio State University. *Available at:* [radio.wosu.org/post/citizens-debate-rules-distance-between-wind-farms-and-their-property#stream/0](http://radio.wosu.org/post/citizens-debate-rules-distance-between-wind-farms-and-their-property#stream/0)

<sup>14</sup> National Renewable Energy Laboratory. Land use requirements for solar power plants in the US. *Available at:* [www.nrel.gov/docs/fy13osti/56290.pdf](http://www.nrel.gov/docs/fy13osti/56290.pdf)

<sup>15</sup> BOEM. 2018. Renewable energy research. *Available at:* [www.boem.gov/Renewable-Energy-Environmental-Studies/](http://www.boem.gov/Renewable-Energy-Environmental-Studies/)

during construction, and two years following construction to record environmental effects.<sup>16</sup>

### **8. Are there other companies and leasing areas with proposed wind projects? What will the ocean look like in 20 years in terms of wind power?**

There are quite a few wind projects being proposed and discussed in the Atlantic; and it appears that about 2000 turbines could be installed over the next decade. The demand for offshore wind can change due to technology advances, costs of other energy sources, politics, etc. To date, BOEM has issued commercial leases to 11 offshore wind development companies within 15 leasing areas in the Mid-Atlantic.<sup>17</sup> Leases do not guarantee that those areas will be fully utilized. BOEM is also planning to open up additional areas off of California, Delaware, Hawaii, Maryland, Massachusetts, New Jersey, New York, North Carolina, Rhode Island, South Carolina and Virginia to offshore wind development.<sup>18</sup>

## **HUMAN USE QUESTIONS**

### **9. Will fishermen be able to fish between offshore wind turbines?**

Recreational and commercial fishing vessels will be able to fish between the turbines; however, turbines may act as additional hazards for fishing vessels during times of poor visibility and heightened wave energy. To note, during construction safety zones will be in place around each turbine, temporarily restricting access.<sup>19</sup> The United States Coast Guard stated that they will not restrict fishing access around offshore wind turbines and between the turbines.<sup>20</sup> Orsted's lease also prohibits imposing long-term fishing exclusion zones.<sup>21</sup> Orsted representatives have stated that turbines will be a significant distance apart (estimated to be 1 mile), but the actual details regarding distance between turbines haven't been released.

### **10. Will I be able to see the turbines from shore?**

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<sup>16</sup> Tetra Tech. 2016. Site Assessment Plan: Deepwater Wind North Lease OCS-A 0486. Deepwater Wind New England LLC. *Available at:* [www.boem.gov/Site-Assessment-Plan-for-OCS-A-0486](http://www.boem.gov/Site-Assessment-Plan-for-OCS-A-0486)

<sup>17</sup> BOEM. 2018. Lease and Grant Information. *Available at:* [www.boem.gov/Lease-and-Grant-Information/](http://www.boem.gov/Lease-and-Grant-Information/)

<sup>18</sup> BOEM. 2017. BOEM Fact Sheet: BOEM's Renewable Energy Program. Updated June 2018. *Available at:* [www.boem.gov/BOEM-RE-Programs-Fact-Sheet/](http://www.boem.gov/BOEM-RE-Programs-Fact-Sheet/)

<sup>19</sup> Walsh, C. 2017. Fishermen demand answers on wind power plan. *The East Hampton Star*. *Available at:* [easthamptonstar.com/Government/20171214/Fishermen-Demand-Answers-Wind-Power-Plan](http://easthamptonstar.com/Government/20171214/Fishermen-Demand-Answers-Wind-Power-Plan)

<sup>20</sup> BOEM. 2015. Fishermen Workshops: Providing input into BOEM's identification of an offshore wind energy area offshore New York. *Available at:* [www.boem.gov/NY-Summary-Fisheries-Outreach-Call-Area/](http://www.boem.gov/NY-Summary-Fisheries-Outreach-Call-Area/)

<sup>21</sup> BOEM. November 2012. Commercial Lease of Submerged Land For Renewable Energy Development On the Outer Continental Shelf. OCS-A 0482. *Available at:* [www.boem.gov/uploadedFiles/BOEM/Renewable\\_Energy\\_Program/State\\_Activities/Executed%20Lease%20OCS-A\(1\).pdf](http://www.boem.gov/uploadedFiles/BOEM/Renewable_Energy_Program/State_Activities/Executed%20Lease%20OCS-A(1).pdf)

A 650 foot turbine placed 23 miles offshore should only be visible on the clearest of days, or about 20% of days in the year.<sup>22 23</sup> At the closest point, the Skipjack Wind Farm will be 18 miles offshore from Delaware, 25 miles from Ocean City, and 19.5 miles offshore from the Delaware/Maryland border. Skipjack will be using turbines that are about 850 feet tall.

### **11. Will offshore turbines reduce the swell that arrives on shore?**

More research on this topic is needed. Surfrider could not find any anecdotal or scientific evidence of swell reduction from offshore wind turbine arrays. Turbines at this farm will be placed rather far apart, about one mile, so impacts to surfing waves are not expected. One study found that a very large array of turbines (78 thousand turbines) could reduce wind speeds, but that should not affect long-period swell, only wind driven waves.<sup>24</sup> Another study did not find a scientifically significant difference in swell wave structure before and after passing through a turbine array.<sup>25, 26</sup>

## **ENVIRONMENTAL IMPACT QUESTIONS**

### **12. Will there be impacts to bats and birds?**

Wind turbines on land have had substantial negative impacts to birds and bats. Total U.S estimates for bird mortality from collision with terrestrial wind turbines ranges from 140,000<sup>27</sup> to 573,000<sup>28</sup> birds per year. However, there is insufficient data on the effect of

<sup>22</sup> Sullivan, R.G., Kirchler, L.B., Cothren, J. & Winters, S.L. 2013. Offshore wind turbine visibility and visual impact threshold distances. *Environmental Practice*: Vol. 15, No. 1, Pp. 33-49. *Available at*: [www.cambridge.org/core/journals/environmental-practice/article/research-article-offshore-wind-turbine-visibility-and-visual-impact-threshold-distances/59A51F3CD207849FC7F5BD986F15B2CB](http://www.cambridge.org/core/journals/environmental-practice/article/research-article-offshore-wind-turbine-visibility-and-visual-impact-threshold-distances/59A51F3CD207849FC7F5BD986F15B2CB)

<sup>23</sup> BOEM. Mangi Environmental Group. 2012. Visualization Study for Offshore North Carolina.

*Available at*:

[boem.gov/sites/default/files/renewable-energy-program/State-Activities/NC/NC-Visualization-Task-Force-Pres.pdf](http://boem.gov/sites/default/files/renewable-energy-program/State-Activities/NC/NC-Visualization-Task-Force-Pres.pdf)

<sup>24</sup> Jacobson, M.Z., Archer, C.L. & Kempton, W. 2014. Taming hurricanes with arrays of offshore wind turbines.

*Nature Climate Change*: Vol. 4, Pp. 195-200. *Available at*: [www.nature.com/articles/nclimate2120](http://www.nature.com/articles/nclimate2120).

<sup>25</sup> Navitus Bay Development Limited. 2014. Navitus Bay Wind Park Physical Processes Assessment: Environmental Statement. Document 6.1.2.5: Vol. B, Ch. 5, Pp. 78. *Available at*:

[infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010024/EN010024-000802-6.1.2.5%20Volume%20B%20Offshore%20Chapter%205%20Physical%20Processes.pdf](http://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010024/EN010024-000802-6.1.2.5%20Volume%20B%20Offshore%20Chapter%205%20Physical%20Processes.pdf)

<sup>26</sup> ABP Marine Environmental Research Limited. 2014. Navitus Bay Wind Park Physical Processes Assessment: Technical Appendix. Navitus Bay Development Limited, Report R.2015: Vol B. Ch. 5, Pp. 174. *Available at*:

[infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010024/EN010024-000843-6.2.2.5.1%20Volume%20B%20Chapter%205%20Physical%20Processes%20Appendix%205.1.pdf](http://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010024/EN010024-000843-6.2.2.5.1%20Volume%20B%20Chapter%205%20Physical%20Processes%20Appendix%205.1.pdf)

<sup>27</sup> Loss, S., Will, T., Marra, P. 2013. Estimates of bird collision mortality at wind facilities in the contiguous United States. *Biological Conservation*: Vol. 168, Pp. 201–209. *Available at*:

[www.fws.gov/migratorybirds/pdf/management/lossetal2013windfacilities.pdf](http://www.fws.gov/migratorybirds/pdf/management/lossetal2013windfacilities.pdf)

<sup>28</sup> Smallwood, K. 2013. Comparing bird and bat fatality-rate estimates among North American wind-energy projects. *Wildlife Society Bulletin*: Vol. 37, No. 1, Pp. 19-33. *Available at*:

[onlinelibrary.wiley.com/doi/abs/10.1002/wsb.260](http://onlinelibrary.wiley.com/doi/abs/10.1002/wsb.260)

offshore wind turbines on birds and bats, mainly because recording bird and bat mortality offshore is very difficult (carcasses may sink or be eaten before documented by an observer).<sup>29</sup>

Besides possible direct mortality from turbines, birds and bats may also be negatively affected by avoiding or being displaced by wind farms. However, some species of birds are attracted to wind farms, probably for feeding and resting opportunities.<sup>30</sup> For both birds and bats, the location of the turbines is crucial to understanding impacts, especially considering migratory pathways.<sup>31</sup> Lights placed on turbines could increase mortality as some species of both birds and bats are drawn to them.<sup>32, 33</sup> However, using lights that blink on and off has been shown to mitigate this issue.<sup>34</sup>

When comparing bird mortality to the energy produced per gigawatt hour (GWh), wind farms may be less detrimental than nuclear or fossil fuel power plants. According to one analysis, wind farms kill roughly 0.33 birds per GWh, whereas nuclear and fossil-fueled power stations kill about 0.6 birds per GWh, and 9.4 birds per GWh respectively.<sup>35</sup> For further context, studies have shown that free-ranging domestic cats in the US kill 1.3–4.0 billion birds per year.<sup>36</sup>

### 13. What are the impacts to ocean animals from increased noise?

Wind farms can increase marine noise levels during surveying, construction, and operation. Noise pollution can negatively impact a wide range of marine animals including mammals, fish, shellfish, and larvae. Depending on the proximity to the noise

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<sup>29</sup> Ibid.

<sup>30</sup> Dierschke, V., Furness, R.W. & Garthe, S. 2016. Seabirds and offshore wind farms in European waters: Avoidance and attraction. *Biological Conservation*: Vol. 202, Pp. 59-68. Available at: [www.sciencedirect.com/science/article/pii/S0006320716303196](http://www.sciencedirect.com/science/article/pii/S0006320716303196)

<sup>31</sup> Sjollem, A., Gates, J., Hilderbrand, R. & Sherwell, J. 2014. Offshore Activity of Bats Along the Mid-Atlantic Coast. *Northeastern Naturalist*: Vol. 21, No. 2, Pp. 154-163. Available at: [doi.org/10.1656/045.021.0201](https://doi.org/10.1656/045.021.0201)

<sup>32</sup> Voigt, C., Roeleke, M., Marggraf, L., Petersons, G., & Voigt-heucke, S.L. 2017. Migratory bats respond to artificial green light with positive phototaxis. *PLOS ONE*. Available at: [journals.plos.org/plosone/article?id=10.1371/journal.pone.0177748](https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0177748)

<sup>33</sup> Manville, A. M. 2000. The ABCs of avoiding bird collisions at communication towers: the next steps. Proceedings of the Avian Interactions Workshop, December 2, 1999, Charleston, SC. Electric Power Research Institute (in press). Available at: [nctc.fws.gov/resources/knowledge-resources/bird-publications/tower-collisions.html](http://nctc.fws.gov/resources/knowledge-resources/bird-publications/tower-collisions.html)

<sup>34</sup> Gehring, J., Kerlinger, P., & Manville, A.M. 2009. Communication towers, lights, and birds: Successful methods of reducing the frequency of avian collisions. *Ecological Applications*: Vol. 19, No.2, Pp. 505-514. Available at: [www.opc.ca.gov/webmaster/\\_media\\_library/2016/01/Gehring-et-al-2009-Communication-Towers-Lights-and-Bird-s.pdf](http://www.opc.ca.gov/webmaster/_media_library/2016/01/Gehring-et-al-2009-Communication-Towers-Lights-and-Bird-s.pdf)

<sup>35</sup> Sovacool, B.K. 2012. The avian and wildlife costs of fossil fuels and nuclear power. *Journal of Integrative Environmental Sciences*: Vol. 9, No. 4, Pp. 255-278; Vermont Law School Research Paper No. 04-13. Available at: [ssrn.com/abstract=2198024](http://ssrn.com/abstract=2198024)

<sup>36</sup> Loss, S., Will, T., & Marra, P.P. 2013. The impact of free-ranging domestic cats on wildlife of the United States. *Nature Communications*: Vol. 4, No. 1396. Available at: [www.nature.com/articles/ncomms2380](http://www.nature.com/articles/ncomms2380)

source and loudness of the sound, responses can range from no reaction, to detection and behavioral changes, to physical injury and permanent hearing loss. Fortunately there are methods to mitigate the impacts from offshore wind noise pollution. European wind farms have used multiple techniques including seasonal and diurnal restrictions on construction and noise limits.<sup>37</sup> During construction of the Block Island Wind Farm, Deepwater Wind put in place many mitigation measures, including shutting down pile driving if marine mammals were spotted in the area.<sup>38</sup>

During surveying, developers use high resolution geophysical instruments to map the seafloor. Though not as loud, constant, or widespread as seismic blasting used during oil and gas exploration, geophysical surveys for offshore wind still emit loud noises and can negatively affect marine mammals, and cause marine animals to temporarily avoid the area.<sup>39</sup>

Pile driving during construction also produces loud noises. Sensors at the Block Island Wind Farm measured a peak sound pressure level of 188 underwater decibels at 500 meters during pile driving.<sup>40</sup> To put that in context, some marine mammals (particularly harbor porpoise) begin to show avoidance behavior beginning at 120 underwater decibels,<sup>41</sup> and rely on their hearing for navigation, communication, feeding, and general survival.<sup>42</sup> Note that underwater and air decibels have different reference levels, and ears evolved to hear in water have different sensitivities than ears evolved to hear in air. All things being equal, underwater and air levels are about 62 decibels different for the same intensity of sound.

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<sup>37</sup> Reeve, E., Drew-Murphy, J. & Pfeister, D. 2018. Briefing paper: Understanding the effects of offshore wind farms on the natural environment; Part 2. Renewable Consulting Group.

<sup>38</sup> Fiorentino, J. 2014. Issuance of incidental harassment authorizations to Deepwater Wind for the take of marine mammals incidental to construction of the Block Island wind farm and Block Island transmission system. NOAA, National Marine Fisheries Service. *Available at:* <https://repository.library.noaa.gov/view/noaa/5007>

<sup>39</sup> Southall, B.L., Rowles, T., Gulland, F., Baird, R.W., and Jepson, P.D. 2013. Final report of the Independent Scientific Review Panel investigating potential contributing factors to a 2008 mass stranding of melon-headed whales (*Peponocephala electra*) in Antsohihy, Madagascar. *Available at:* [www.cascadiaresearch.org/oldsite/Hawaii/Madagascar\\_ISRP\\_Final\\_report.pdf](http://www.cascadiaresearch.org/oldsite/Hawaii/Madagascar_ISRP_Final_report.pdf)

<sup>40</sup> Miller, J., Potty, G., Lin, Y., Newhall, A., Raposa, K., Frankel, A., Giard, J., & Mason, T. 2017. Monitoring the environmental effects of construction and initial operation of the first offshore wind farm in the US. *Available at:* [tethys.pnnl.gov/tethys-stories/monitoring-environmental-effects-construction-and-initial-operation-first-offshore](http://tethys.pnnl.gov/tethys-stories/monitoring-environmental-effects-construction-and-initial-operation-first-offshore)

<sup>41</sup> National Marine Fisheries Service. 2018. 2018 Revisions to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (Version 2.0): Underwater Thresholds for Onset of Permanent and Temporary Threshold Shifts. U.S. Dept. of Commerce, NOAA. NOAA Technical Memorandum NMFS-OPR-59, Pp. 167. *Available at:* [www.fisheries.noaa.gov/resource/document/technical-guidance-assessing-effects-anthropogenic-sound-marine-mammal](http://www.fisheries.noaa.gov/resource/document/technical-guidance-assessing-effects-anthropogenic-sound-marine-mammal)

<sup>42</sup> Bailey, H., Brookes, K., & Thompson, P. 2014. Assessing environmental impacts of offshore wind farms: lessons learned and recommendations for the future. *Aquatic Biosystems*: Vol. 10, No. 8. *Available at:* [www.ncbi.nlm.nih.gov/pmc/articles/PMC4172316/](http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4172316/)



For land based turbines, operational noise has been measured at 40 air decibels at a distance of 1000 feet.<sup>43</sup> At the Block Island Wind Farm, operational noise is barely detectable at a distance of 165 feet.<sup>44,45</sup> It is possible that operational noise could cause marine animals to travel outside of their usual migration routes, and potentially away from important nurseries and feeding grounds.<sup>46</sup>

#### **14. What about scouring of the seafloor from the turbines?**

Scouring, or erosion of the seafloor, can occur around the base of offshore wind turbines. This is caused by tidal currents, waves, and associated sediment movement around the base of the structure. If severe, scouring can reduce the structural integrity of the turbine and its ability to withstand strong winds, currents, and waves. To prevent this, wind farms have placed stones or concrete pads around turbine bases, but this only prevents scouring at the source, and many will simply experience scouring at the edge of the “bed protection.” Generally, areas with stronger currents, energetic wave action, and looser sediment will experience scouring sooner.<sup>47</sup>

#### **15. Will there be impacts from power cable electromagnetic fields?**

Power cables that connect offshore turbines to land (and to each other) will produce an electromagnetic field (EMF). There is limited research on the issue, but generally speaking EMF’s are only detected by certain ocean wildlife, including some fish species, sea turtles, marine mammals like whales and dolphins, and crustaceans like lobster and crabs. These species are all able to perceive the Earth’s geomagnetic field, and it is hypothesized that EMF’s could cause disorientation. For instance, preliminary studies indicate that EMF’s could interfere with sea turtle hatchlings’ ability to navigate to important nurseries, but more information is necessary to confirm.<sup>48</sup> So far, research

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<sup>43</sup> Ellenbogen, J.M., Grace, S., Heiger-Bernays, W.J., Manwell, J.F., Mills, D.A., Sullivan, K.A. & Weisskopf, M.G. 2012. Wind turbine health impact study: Report of independent expert panel. MA Department of Environmental Protection & MA Department of Public Health. *Available at:* <https://www.mass.gov/files/documents/2016/08/th/turbine-impact-study.pdf>

<sup>44</sup> McCann, J. 2017. The Block Island Wind Farm: What have we learned? URI Coastal Resources Center, Rhode Island Sea Grant. URI Graduate School of Oceanography. Presentation at the Southern New England Offshore Wind Science Forum, December 2017.

<sup>45</sup> Bailey, H., Brookes, K., & Thompson, P. 2014. Assessing environmental impacts of offshore wind farms: lessons learned and recommendations for the future. *Aquatic Biosystems*: Vol. 10, No. 8. *Available at:* [www.ncbi.nlm.nih.gov/pmc/articles/PMC4172316/](http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4172316/)

<sup>46</sup> Ibid.

<sup>47</sup> Whitehouse, R., Harris, J., Sutherland, J., & Rees, J. 2008. An assessment of field data for scour at offshore wind turbine foundations. Fourth International Conference on Scour and Erosion. *Available at:* [izw.baw.de/publikationen/tc213/0/b\\_13.pdf](http://izw.baw.de/publikationen/tc213/0/b_13.pdf)

<sup>48</sup> Normandeau, Exponent, T. Tricas, and A. Gill. 2011. Effects of EMFs from Undersea Power Cables on Elasmobranchs and Other Marine Species. U.S. Dept. of the Interior, Bureau of Ocean Energy Management,

has not shown significant negative impacts to any marine species, but there are a lot of data gaps, and additional studies need to be conducted.<sup>49</sup> Generally, EMFs for direct current (DC) cables are more powerful compared to alternating current (AC).<sup>50</sup> Additionally, the cumulative impact of multiple power cables is unknown, as many studies assume that mobile species avoid significant impacts by simply moving away from sources of EMF.<sup>51</sup> Some researchers believe that impacts from EMF will be increased for floating turbines, but again, this is not well documented.<sup>52</sup>

### **16. What are the cumulative impacts from constructing hundreds of turbines?**

It is difficult to predict how many offshore wind turbines will eventually be installed, but to date, BOEM has issued commercial leases to 11 offshore wind development companies within 15 leasing areas on the east coast.<sup>53</sup> Leases do not guarantee that those areas will be fully utilized, but currently it looks like about 2000 turbines will be installed over the next five to ten years. The cumulative impacts of that amount of turbines on ocean species is basically unknown, and highlights the need for adaptive management and continued research and monitoring.

### **17. How deep will the power cables be under the seafloor and beach?**

Cables will be placed 4-6 feet under the seafloor using a technique called “trenching”. When the cable reaches the shore, it will be directionally drilled under the beach.<sup>54</sup> Temporary habitat loss is experienced for fish, benthic species, sea turtles, and marine mammals during installation of the power cable. Overtime however, there can be habitat gains at the base of the turbine, as is seen at the Block Island Wind Farm and examples in Europe.<sup>55, 56</sup>

### **18. Aren't wind turbines made from rare-earth metals and GHG intensive materials?**

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Regulation, and Enforcement, Pacific OCS Region, Camarillo, CA. OCS Study BOEMRE 2011-09. *Available at:* [www.boem.gov/ESPIS/4/5115.pdf](http://www.boem.gov/ESPIS/4/5115.pdf)

<sup>49</sup> Ibid.

<sup>50</sup> Ibid.

<sup>51</sup> Ibid.

<sup>52</sup> Reeve, E., Drew-Murphy, J. & Pfeister, D. 2018. Briefing paper: Understanding the effects of offshore wind farms on the natural environment. Renewable Consulting Group.

<sup>53</sup> Lease and Grant Information. BOEM. *Available at:* [www.boem.gov/Lease-and-Grant-Information/](http://www.boem.gov/Lease-and-Grant-Information/)

<sup>54</sup> Orsted. Skipjack Wind Farm. *Available at:* [dwwind.com/project/skipjack-wind-farm](http://dwwind.com/project/skipjack-wind-farm)

<sup>55</sup> American Wind Energy Association. 2017. Photo evidence: Fish feeding frenzy at Block Island Wind Farm. *Available at:* [www.aweablog.org/photo-evidence-fish-feeding-frenzy-block-island-wind-farm/](http://www.aweablog.org/photo-evidence-fish-feeding-frenzy-block-island-wind-farm/)

<sup>56</sup> Slavik, K., Lemmen, C., Zhang, W., Kerimoglu, O., Klingbeil, K. & Wirtz, K.W. 2018. The large scale impact of offshore wind farm structures on pelagic primary production in the southern North Sea. Submitted to *Hydrobiologia*, May 2018. *Available at:* [arxiv.org/abs/1709.02386](https://arxiv.org/abs/1709.02386).

The construction of turbines requires the use of a lot of raw materials and, depending on the turbine selected, some amount of rare-earth metals.<sup>57</sup> The initial extraction of raw materials and minerals, especially neodymium oxide, can cause severe environmental and human health impacts. For instance, neodymium oxide is mainly sourced from China (as are 95% of all rare-metals)<sup>58</sup>, where there is a lack of environmental laws surrounding mining practices. There have been multiple reports of disastrous impacts to human and environmental health due to exposure to carcinogenic, toxic, and radioactive waste produced during mining.<sup>59</sup> Other raw materials necessary for wind turbines include iron, steel rebar, concrete, copper, and dysprosium. This is an important issue, and more research needs to be conducted on the impacts of mineral extraction for turbines, and assurance that wind energy companies manage their supply chain to ensure that mines use safety protocols to prevent the release of harmful pollutants. To note, other energy sources also require significant use of raw materials for construction—such as nuclear power plants and oil refineries. Life cycle analysis studies found that per kWh of electricity generated, wind energy uses less water, and emits significantly less carbon dioxide, nitrogen oxide, and sulfur dioxide than fossil fuel plants. Though the construction of wind turbines is currently resource intensive, the operational phase of wind turbines results in minimal to no waste or greenhouse gas emissions. When compared to the construction needs and continual generation of high level radioactive waste from nuclear energy, or greenhouse gas emissions from fossil fuel energy, the wind industry has a much smaller environmental footprint.<sup>60</sup>

## ECONOMIC QUESTIONS

### 19. Will new offshore wind power projects create jobs?

According to a report funded by Oceana, adding 143 GW of offshore wind generation could create 218,000 jobs, which is double the amount expected to be provided from offshore oil drilling development over the same timeframe.<sup>61</sup> The US Department of Energy and Department of Interior estimate that the development of 86 GW of offshore

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<sup>57</sup> Wilburn, D. 2011. Wind energy in the United States and materials required for the land-based wind turbine industry from 2010 through 2030. US Geological Survey. Scientific Investigations Report 2011-5036. Available at: [pubs.usgs.gov/sir/2011/5036/sir2011-5036.pdf](https://pubs.usgs.gov/sir/2011/5036/sir2011-5036.pdf)

<sup>58</sup> Bourzac, K. 2011. The rare-earth crisis. *MIT Technology Review*. Available at: [www.technologyreview.com/s/423730/the-rare-earth-crisis/](http://www.technologyreview.com/s/423730/the-rare-earth-crisis/)

<sup>59</sup> Rim, K.T., Koo, K.H. & Park, J.S. 2013. Toxicological evaluations of rare earths and their health impacts to workers: A literature review. *Safety and Health at Work*: Vol. 4, No. 1, Pp, 12-26. Available at: [www.sciencedirect.com/science/article/pii/S2093791113410028](http://www.sciencedirect.com/science/article/pii/S2093791113410028)

<sup>60</sup> Wilburn, D. 2011. Wind energy in the United States and materials required for the land-based wind turbine industry from 2010 through 2030. US Geological Survey. Scientific Investigations Report 2011-5036. Available at: [pubs.usgs.gov/sir/2011/5036/sir2011-5036.pdf](https://pubs.usgs.gov/sir/2011/5036/sir2011-5036.pdf)

<sup>61</sup> Oceana. 2016. Offshore energy by the numbers, an economic analysis of offshore drilling and wind energy in the Atlantic. Available at: [usa.oceana.org/sites/default/files/offshore\\_energy\\_by\\_the\\_numbers\\_report\\_final.pdf](http://usa.oceana.org/sites/default/files/offshore_energy_by_the_numbers_report_final.pdf)

wind power by 2050, would provide an increase of 160,000 jobs.<sup>62</sup> Additionally, US Wind and Orsted must jointly invest at least \$76 million in a steel fabrication plant in Maryland and fund at least \$39.6 million to support port upgrades at the Tradepoint Atlantic (formerly Sparrows Point) shipyard in Baltimore County.<sup>63</sup>

## **20. Will my electricity rate go up because of offshore wind projects?**

The Maryland Public Service Commission estimates that the Skipjack Wind Farm will cost the average Maryland ratepayer an additional \$0.43 per month when it starts operating.<sup>64</sup> Generally, when energy companies build new infrastructure, customers foot the bill; however, many factors affect energy rates, including other energy projects, regulations and policies, subsidies, weather, global energy markets, transmission systems, and power purchase agreements.<sup>65</sup> A 2016 report by the Department of Energy (DOE) found that the cost of offshore wind energy is steadily dropping and is already cost competitive with other energy sources.<sup>66 67</sup>

## **21. Who is paying for this project?**

The privately-owned company, Orsted, will pay the upfront project costs but, as stated above, much of those costs will be transferred to Maryland consumers via rate changes (estimated at an increase of \$0.43 per month when the project become operational, estimated to be in 2022).<sup>68</sup>

## **22. How much is Maryland paying Orsted for the energy from the Skipjack project and for how long?**

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<sup>62</sup> Departments of the Interior and Energy. 2016. National Offshore Wind Strategy. Available at: [www.boem.gov/National-Offshore-Wind-Strategy](http://www.boem.gov/National-Offshore-Wind-Strategy)

<sup>63</sup> Maryland Public Service Commission. Maryland PSC awards ORECS to two offshore wind developers. Available at: [www.psc.state.md.us/wp-content/uploads/PSC-Awards-ORECs-to-US-Wind-Skipjack.pdf](http://www.psc.state.md.us/wp-content/uploads/PSC-Awards-ORECs-to-US-Wind-Skipjack.pdf)

<sup>64</sup> Maryland Public Service Commission. Maryland PSC awards ORECS to two offshore wind developers. Available at: [www.psc.state.md.us/wp-content/uploads/PSC-Awards-ORECs-to-US-Wind-Skipjack.pdf](http://www.psc.state.md.us/wp-content/uploads/PSC-Awards-ORECs-to-US-Wind-Skipjack.pdf)

<sup>65</sup> US Energy Information Administration. 2018. Electricity explained: Factors affecting electricity prices. US Department of Energy. Available at: [www.eia.gov/energyexplained/index.cfm?page=electricity\\_factors\\_affecting\\_prices](http://www.eia.gov/energyexplained/index.cfm?page=electricity_factors_affecting_prices)

<sup>66</sup> Musial, W., Beiter, P., Schwabe, P., Tian, T., Stehly, T., & Spitsen, P. 2017. 2016 Offshore wind technologies market report. US Department of Energy, Office of Energy Efficiency & Renewable Energy. Available at: [energy.gov/eere/wind/downloads/2016-offshore-wind-technologies-market-report](http://energy.gov/eere/wind/downloads/2016-offshore-wind-technologies-market-report)

<sup>67</sup> Fares, R. 2017. Wind energy is one of the cheapest sources of electricity, and it's getting cheaper. *Scientific American Unplugged*. Available at: [blogs.scientificamerican.com/plugged-in/wind-energy-is-one-of-the-cheapest-sources-of-electricity-and-its-getting-cheaper/](http://blogs.scientificamerican.com/plugged-in/wind-energy-is-one-of-the-cheapest-sources-of-electricity-and-its-getting-cheaper/)

<sup>68</sup> Maryland Public Service Commission. Maryland PSC awards ORECS to two offshore wind developers. Available at: [www.psc.state.md.us/wp-content/uploads/PSC-Awards-ORECs-to-US-Wind-Skipjack.pdf](http://www.psc.state.md.us/wp-content/uploads/PSC-Awards-ORECs-to-US-Wind-Skipjack.pdf)

On May 1, 2017, the Maryland Public Service Commission voted to award 20 year offshore wind renewable energy credits (ORECs) to Deepwater Wind for energy from the Skipjack Wind Farm, at \$0.13 per kilowatt-hour (In 2012 dollars; \$0.17 in 2022 dollars).<sup>69</sup>

## ENGINEERING QUESTIONS

### 23. How big are the offshore turbines?

The 12MW Haliade-x turbines Orsted plans to use will be about 850 feet tall. The Block Island Wind Farm consists of five, 689 foot tall wind turbines. For comparison, that's twice the size of the statue of liberty, with each producing six MW of electricity.<sup>70</sup>

### 24. Won't rough conditions and hurricanes destroy the turbines?

A 2017 study showed that current turbine designs cannot survive wind speeds and wind shear from a Category 5 hurricane.<sup>71</sup> Yet onshore turbines used in Texas withstood wind speeds over 130 mph from Hurricane Harvey, a Category 4 hurricane.<sup>72</sup> Surfrider would like to see that the turbines used in the Skipjack project can easily handle winds speeds that are statistically shown to occur in the region. We should note that turbines are designed to stop operating at a "cut-out" wind speed to prevent unnecessary strain on the rotor blades, but again this varies by turbine type.<sup>73</sup> For example, turbines at the Block Island Wind Farm in Rhode Island shut off when winds exceed 55 mph, and then power back up once winds diminish. Thorough and ongoing maintenance, monitoring, and inspections will be critical to ensure that turbines maintain structural integrity and the ability to handle extreme weather.

### 25. How often do the turbines require maintenance?

The turbines used in the Block Island Wind Farm require routine maintenance about every two weeks, with larger, yearly maintenance projects occurring in the late summer when wind speeds are low.<sup>74</sup> As the turbines that will be used for the Skipjack project are still unknown, their maintenance schedule is also unknown.

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<sup>69</sup> Maryland Public Service Commission. Maryland PSC awards ORECS to two offshore wind developers. Available at: [www.psc.state.md.us/wp-content/uploads/PSC-Awards-ORECs-to-US-Wind-Skipjack.pdf](http://www.psc.state.md.us/wp-content/uploads/PSC-Awards-ORECs-to-US-Wind-Skipjack.pdf)

<sup>70</sup> Garfield, L. 2017. America's first offshore wind farm launched with GE turbines twice as tall as the Statue of Liberty. *Business Insider*. Available at: [www.businessinsider.com/ge-wind-farm-block-island-2017-5](http://www.businessinsider.com/ge-wind-farm-block-island-2017-5)

<sup>71</sup> Worsnop, P.W., Lundquist, J.K., Bryan, G.H., Damiani, R. & Musial, W. 2017. Gusts and shear within hurricane eyewalls can exceed offshore wind turbine design standards. *Geophysical Research Letters*: Vol. 44, No. 12, Pp. 6413-6420. Available at: [agupubs.onlinelibrary.wiley.com/doi/full/10.1002/2017GL073537](http://agupubs.onlinelibrary.wiley.com/doi/full/10.1002/2017GL073537)

<sup>72</sup> Cleanenergy.org via Reve. 2017. Texas wind turbines survive hurricane harvey. Available at: [www.evwind.es/2017/08/30/texas-wind-turbines-survive-hurricane-harvey/60862](http://www.evwind.es/2017/08/30/texas-wind-turbines-survive-hurricane-harvey/60862)

<sup>73</sup> US Department of Energy. 2017. How do wind turbines survive severe storms? Office of Energy Efficiency and Renewable Energy. Available at: [energy.gov/eere/articles/how-do-wind-turbines-survive-severe-storms](http://energy.gov/eere/articles/how-do-wind-turbines-survive-severe-storms)

<sup>74</sup> Communications with Deepwater Wind. April 2018. September 2018.

## **26. What is the lifespan of each turbine and what happens when they are obsolete?**

Generally, turbines are rated by the manufacturers to operate for 25 years.<sup>75</sup> The federal government requires that developers submit a decommissioning plan and post a bond to cover the cost of those decommissioning activities, including removing turbines from the water.<sup>76, 77</sup> At the end of a turbine's useful life, developers have the option to refurbish or repower it (with additional approvals and permits), yet previous plans to refurbish farms in European waters have failed due to technical difficulties and cost concerns.<sup>78</sup> During decommissioning, some structures must be removed-- including the turbines, all associated oils and lubricants, and the foundation attachment ("transition piece"). Other structures, like the foundation pads and subsea cables, may only need to be partially removed, pending the environmental or safety hazard associated with leaving or removing them.<sup>79</sup>

## **27. What happens when it's not windy? How is energy from the turbines stored?**

When it's not windy turbines create less energy, and power companies will need to move more energy into the region from other sources using the transmission grid. Energy from wind turbines is not stored in batteries, which are currently too expensive and impractical for such an application, however as technology improves batteries might become part of offshore wind energy systems. As with other sources, energy will be balanced in the transmission system and managed on a regional scale.<sup>80</sup>

## **28. Do turbines have back up generators to provide energy for basic functions when the wind dies?**

No.<sup>81</sup> If the turbine cannot create its own power from the wind, energy can be routed from land to the turbine through the power cable. However, if the entire grid fails for

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<sup>75</sup> Renewables First. 2015. How long does a wind turbine last? *Available at:* [www.renewablesfirst.co.uk/windpower/windpower-learning-centre/how-long-do-wind-turbines-installations-last/](http://www.renewablesfirst.co.uk/windpower/windpower-learning-centre/how-long-do-wind-turbines-installations-last/)

<sup>76</sup> BOEM. 2013. Commercial Lease of Submerged Land For Renewable Energy Development On the Outer Continental Shelf. OCS-A 0486. *Available at:*

[www.boem.gov/Renewable-Energy-Program/State-Activities/RI/Executed-Lease-OCS-A-0486.aspx](http://www.boem.gov/Renewable-Energy-Program/State-Activities/RI/Executed-Lease-OCS-A-0486.aspx)

<sup>77</sup> BOEM. 2016. Guidelines for Information Requirements for a Renewable Energy Construction and Operations Plan (COP). *Available at:* [www.boem.gov/COP-Guidelines/](http://www.boem.gov/COP-Guidelines/)

<sup>78</sup> Vattenfall. 2016. The First Decommission in the World of an Offshore Wind Farm Is Now Complete. Vattenfall Press Release. *Available at:*

[corporate.vattenfall.com/press-and-media/press-releases/2016/the-first-decommission-in-the-world-of-an-offshore-wind-farm-is-now-complete/](http://corporate.vattenfall.com/press-and-media/press-releases/2016/the-first-decommission-in-the-world-of-an-offshore-wind-farm-is-now-complete/)

<sup>79</sup> Topham, E. & McMillan, D. 2017. Sustainable decommissioning of an offshore wind farm. *Renewable Energy: Vol. 102, Part B, Pp. 470-480. Available at:* [www.sciencedirect.com/science/article/pii/S0960148116309430#bib9](http://www.sciencedirect.com/science/article/pii/S0960148116309430#bib9)

<sup>80</sup> American Wind Energy Association. Nd. Wind Energy and Storage. *Available at:* [www.awea.org/wind-energy-storage](http://www.awea.org/wind-energy-storage)

<sup>81</sup> US Department of Energy. Nd. The inside of a wind turbine. *Available at:* [www.energy.gov/eere/wind/inside-wind-turbine-0](http://www.energy.gov/eere/wind/inside-wind-turbine-0)

some reason, substations will most likely be equipped with diesel generators to provide power to the turbines. Turbines require power to keep out moisture, run lights, and direct the blades into the wind in the event of strong winds.<sup>82</sup>

### **29. Are there other structures besides the turbines that need to be placed on the seafloor or on platforms, like substations or anything?**

Yes. In addition to wind turbines, all offshore wind farms also require transmission lines to transport energy from turbines to the shore. These are referred to as “power cables,” and Orsted plans to bury these cables in the seafloor with a technique called trenching. Offshore substations are sometimes used to prevent the loss of energy during this transmission, but the need for offshore substations is dependent on the distance from the coast, quantity of turbines, distance between turbines and amount of electricity generated; with greater distances and quantities increasing the need.<sup>83</sup> Substations would be located on similar foundations as a turbine would, about 60 feet out of the water, with a platform about the size of a small house. Deepwater’s Block Island Wind Farm did not require an offshore substation, but it did require the construction of one onshore to help with electricity distribution.<sup>84</sup> Orsted hasn’t yet mentioned if the Skipjack Wind Farm will include the construction of an offshore substation, but its large distance from the shoreline (19.5 miles) may increase the need.

### **30. Do turbines have any fuel or other toxic materials in them?**

Wind turbines do not have any fuel in them; however, bearings within a wind turbine gearbox need lubrication about every 8 to 12 months, either with synthetic or petroleum based oil. Industry recommends the use of synthetic oil<sup>85</sup> (traditionally not derived from petroleum)<sup>86</sup> or biodegradable lubricants, like vegetable oils, for offshore applications.<sup>87</sup> Turbines can also require grease and hydraulic fluid for certain gears, bearings, and

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<sup>82</sup> Göksu, O. et al. 2017. Black start and island operation capabilities of wind power plants. *Proceedings of the 16th Wind Integration Workshop*. Available at: [www.promotion-offshore.net/fileadmin/PDFs/Conference\\_Paper\\_Black\\_Start\\_and\\_Island\\_Operation\\_Capabilities\\_of\\_Wind\\_Power\\_Plants\\_with\\_note.pdf](http://www.promotion-offshore.net/fileadmin/PDFs/Conference_Paper_Black_Start_and_Island_Operation_Capabilities_of_Wind_Power_Plants_with_note.pdf)

<sup>83</sup> Barberis, N, Todorovic, J. & Ackermann, T. 2006. Loss evaluation of HVAC and HVDC transmission solutions for large offshore wind farms. *Electric Power Systems Research*: Vol. 76, No. 11, Pp. 916-927. Available at: [www.sciencedirect.com/science/article/pii/S0378779605002609](http://www.sciencedirect.com/science/article/pii/S0378779605002609)

<sup>84</sup> Trodson, L. 2018. Wind farm blamed for higher mainland power rates. *Block Island Times*.

<sup>85</sup> Barr, D. 2001. Modern wind turbines: a lubrication challenge. *Machinery Lubrication*. Available at: [www.machinerylubrication.com/Read/395/wind-turbine-lubrication](http://www.machinerylubrication.com/Read/395/wind-turbine-lubrication)

<sup>86</sup> Wright, J. 2011. The basics of synthetic oil technology. *Machinery Lubrication*. Available at: [www.machinerylubrication.com/Read/28671/basics-of-syntic-oil-technology](http://www.machinerylubrication.com/Read/28671/basics-of-syntic-oil-technology)

<sup>87</sup> Sotaventogalicia. Nd. Non toxic, biodegradable and renewable lubricants for wind turbines. Available at: [www.sotaventogalicia.com/en/projects/non-toxic-biodegradable-and-renewable-lubricants-for-wind-turbines](http://www.sotaventogalicia.com/en/projects/non-toxic-biodegradable-and-renewable-lubricants-for-wind-turbines)

hydraulic systems.<sup>88</sup> In total, each turbine could include up to 215 gallons of lubricating oils.<sup>89</sup> If the turbines are “direct drive”, they will not require lubrication.<sup>90</sup> A review of chemical contaminants from offshore wind farms in European waters listed accidental spills of lubricating oils or hydraulic fluid and leached metals from “sacrificial anodes” (charged metals brushed onto boat or turbine surfaces to protect against corrosion) as potential sources. These metals include aluminum, copper, and zinc, which can be toxic to marine life pending concentration and oxidation state.<sup>91</sup> It is unclear if lubricant oils are released into the environment during normal operation, and this should be part of the monitoring and evaluation plan for any offshore installation. Additionally, some wind farms have electrical service platforms (ESPs, also referred to as substations) that can contain fuel and oil,<sup>92</sup> but it is unclear if a substation will be developed for this wind farm. ESPs are generally equipped with collection systems to prevent oil from being released into the environment in the event of a leak from oil-storing equipment.<sup>93</sup>

### **31. Can offshore wind turbines be converted to oil and gas drilling platforms?**

A wind turbine has never been converted to an oil and gas drilling platform. Such an activity would require significant construction and design changes.<sup>94</sup> Additionally, the permits required from state and federal agencies are specific to wind production only.<sup>95</sup> <sup>96</sup> If you look at photos of offshore wind turbines and offshore oil platforms, they are physically very different. Additionally, a “transformed turbine” would need to be located in the same vicinity as oil and gas reserves, and accompanied by all the necessary support structures for oil and gas collection and transport.

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<sup>88</sup> Dutta, S. 2017. A positive spin for wind turbine lubricants. *Available at:* [knowledge.ulprospector.com/7157/lmf-positive-spin-wind-turbine-lubricants/](http://knowledge.ulprospector.com/7157/lmf-positive-spin-wind-turbine-lubricants/)

<sup>89</sup> BOEM. 2013. Environmental Risks, Fate, and Effects of Chemicals Associated with Wind Turbines on the Atlantic Outer Continental Shelf. *Available at:* [www.boem.gov/ESPIS/5/5330.pdf](http://www.boem.gov/ESPIS/5/5330.pdf)

<sup>90</sup> American Superconductor Corp. 2012. SeaTitan. *Available at:* [www.amsc.com/documents/seatitan-10-mw-wind-turbine-data-sheet/](http://www.amsc.com/documents/seatitan-10-mw-wind-turbine-data-sheet/)

<sup>91</sup> Tornero, V. & Hanke, G. 2016. Chemical contaminants entering the marine environment from sea-based sources: A review with a focus on European seas. *Marine Pollution Bulletin*: Vol. 112, No. 1–2, Pp. 17-38. *Available at:* [www.sciencedirect.com/science/article/pii/S0025326X16304957](http://www.sciencedirect.com/science/article/pii/S0025326X16304957)

<sup>92</sup> Moffat & Nichol. 2015. Offshore substation design development of standards. Report developed for Bureau of Safety and Environmental Enforcement & BOEM. *Available at:* [www.boem.gov/723AA/](http://www.boem.gov/723AA/)

<sup>93</sup> BOEM. 2013. Environmental Risks, Fate, and Effects of Chemicals Associated with Wind Turbines on the Atlantic Outer Continental Shelf. *Available at:* [www.boem.gov/ESPIS/5/5330.pdf](http://www.boem.gov/ESPIS/5/5330.pdf)

<sup>94</sup> Fugro Marine GeoServices. 2017. Geophysical and Geotechnical Investigation Methodology Assessment for Siting Renewable Energy Facilities on the Atlantic OCS. US Department of the Interior Bureau of Ocean Energy Management Office of Renewable Energy Programs, OCS Study BOEM 2017-049. Pp. 1.4-1.6. *Available at:* [www.boem.gov/G-and-G-Methodology-Renewable-Energy-Facilities-on-the-Atlantic-OCS/](http://www.boem.gov/G-and-G-Methodology-Renewable-Energy-Facilities-on-the-Atlantic-OCS/)

<sup>95</sup> Renewable Energy Program Regulations (30 CFR 585). Bureau of Ocean Energy Management. *Available at:* [www.boem.gov/uploadedFiles/30\\_CFR\\_585.pdf](http://www.boem.gov/uploadedFiles/30_CFR_585.pdf)

<sup>96</sup> BOEM. 2013. Commercial Lease of Submerged Land For Renewable Energy Development On the Outer Continental Shelf. OCS-A 0486. *Available at:* [www.boem.gov/Renewable-Energy-Program/State-Activities/RI/Executed-Lease-OCS-A-0486.aspx](http://www.boem.gov/Renewable-Energy-Program/State-Activities/RI/Executed-Lease-OCS-A-0486.aspx)



**32. Will there be any structures on land to accompany the project?**

Each project is unique, but every offshore wind farm has to land its power cable onshore to connect to the electricity grid. The onshore landing site generally has little physical impact, but it depends on the specifics of each local coastal environment and intertidal zone. Where the connection to the electric grid occurs, a facility is generally needed to house the connection hardware. For the Skipjack project, the proposed cable will connect to the electricity grid somewhere on the Delmarva Peninsula.<sup>97</sup>

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<sup>97</sup> Orsted. Skipjack Wind Farm. *Available at:* [dwwind.com/project/skipjack-wind-farm](http://dwwind.com/project/skipjack-wind-farm)