

Avoiding Conflicts

New Jersey—as well as many other coastal states concerned with rising sea levels and more frequent hurricanes—is pursuing wind energy development as a source of clean energy to help mitigate global climate change.

One challenge with wind energy is deciding where to place wind farms so they pose the least risk to the ocean, local communities and other industries. For example, poor placement of future wind farm projects could constrain the state's fishing industry, which annually adds \$1.7 billion to the economy. Construction could eliminate prime fishing spots and ecologically special places by damaging ocean bottom structures, and large wind farms could impair whale and bird migrations, and force fishermen to burn more fuel—adding additional costs and emitting more greenhouse gases—in order to travel around them. To avoid such risks, regional ocean planning uses a suite of tools, information and processes to examine the entire picture of how we use, manage and conserve the ocean and coasts. Through enhanced data and stakeholder input, the plan can strengthen the protection of ocean and coastal habitats and encourage sustainable ocean practices and recreational opportunities. Using this tool and having all stakeholders participate can mitigate unintended consequences while moving new projects forward.



Offshore wind as a sustainable use in the Mid-Atlantic region hinges on where it is sited.

In fact, offshore wind is a prime example of why ocean planning must play a critical role as the Mid-Atlantic region moves forward toward siting and constructing these projects. It would be inappropriate to place wind farms on marine habitat that is critical to the health of the ocean or along shipping lanes, whale migration routes and in the path of migratory birds. If we're going to invest in offshore wind farms, everyone involved must be at the table making these decisions, from our fishing communities to the Coast Guard, to tribes and cable layers. We must come to terms that certain areas are just not a good fit for offshore wind while finding places where wind farms are more compatible with protecting ocean habitat and other important sustainable uses.

BOEM must work with stakeholders on a regional scale through the Mid-Atlantic Regional Council on the Ocean (MARCO) and Mid-Atlantic Committee on the Ocean (MACO) to determine stakeholder supported siting and construction conflicts.

Regional ocean planning provides us a common table, with stakeholders engaged in issues throughout the Mid-Atlantic region that would impact the health of the ocean and how wind fits into the broader picture of the Mid-Atlantic Ocean space. BOEM's Renewable Energy Path Forward on the Atlantic and the Mid-Atlantic Bight must be informed by the Northeast Ocean Plan and the Mid-Atlantic Ocean Action Plan, and both regional ocean data portals.

The Society believes in the following principles as federal agencies and states along the Atlantic coast and within the NY/NJ Bight continue to move forward with offshore wind.

Siting of wind projects must be compatible with protecting ocean habitat and ocean wildlife and avoid ecologically special places, including components of ecological importance for the entire Atlantic coast.

Responsible siting will:

- Utilize the ocean data portals as a tool to identify conflicts and special places
- Rely upon the most recent and best available science in addition to baseline ecological information
- Avoid Prime Fishing Areas
- Avoid Migratory Pathways
- Avoid Special Environmental Areas, including areas of high productivity, biodiversity, species abundance, vulnerability and rarity
- Ensure state-level coordination and resource protections
- Utilize MARCO as forum for consistent standards across states
- Require full impact analysis, "cumulative impacts" on a regional scale

Impacts beyond appropriate and most-compatible siting must also be considered. Marine life will be affected at every stage of wind development including during pre-construction, construction, and post-construction activities. We support engaging stakeholders for input on baseline scientific research and a requirement of developers to conduct before, during, and after scientific surveys and analyses, including during site assessment, installation and post-construction.

The ocean is held in public trust and belongs to us all. Wind projects must include regional stakeholder engagement to ensure every voice is given an opportunity to be heard.

Many ocean users whose industry and livelihoods are affected by proposed offshore energy development are operating at regional scales. BOEM's stakeholder engagement must represent those interests throughout the region. Without broad representation and diverse input there is great potential to lose sight of cumulative impacts from millions of acres of currently open ocean area that will be developed and used very differently.

