

GUEST

I convened this meeting because I believe that the review is limited as it stands now. And in order for the

SPEAKER:

Environmental Impact Assessment to be effective, it needs to consider a number of other alternatives in order to provide a larger scope for the project impacts, both positive and negative. The draft Environmental Impact Assessment, as it stands now, considers the number of turbines, the location of the turbines, and a very limited no-build option.

This alternatives analysis fails to create a clear vision of the situational context of the project. In this presentation, I will be discussing ways in which we can revise the Environmental Impact Assessment so that it better evaluates all alternatives and I will provide arguments for why it is necessary to spend the time and money to do so. First, we need to define the goal of the project if we are to effectively evaluate alternative approaches.

Alternatives analysis should paint a picture of the multitude of options available to reach this goal. So I believe that the goal of the project is to provide energy for the growing electricity demand in the region. And studies have shown that new energy facilities will need to be built within the next 15 years to meet this growing demand.

So we should use this goal to frame to project evaluation. And sending a clear goal at the beginning helps to consider better alternatives. And it's necessary to take a step back and to see the project and its impacts in the larger context. So if we all agree to this, that the goal is to meet the growing electricity demand, we must determine that this product is the best option. And the Environmental Impact Assessment is the way that we'll do that.

So to do this, we need to make three major revisions to the Environmental Impact Assessment. One, we need to consider alternative forms of energy production and their environmental, economic, and social impacts if this plant is not to be build. So if we do not build offshore wind, we would build wind farms on land. And what will the land use impacts of that be?

Will we need to build a natural gas plant to meet demand, or is solar an option? So we need to really consider the greater alternatives. It will be difficult to do a full Environmental Impact Assessment of all of these theoretical alternatives. We can pick a few items to focus on, for instance, carbon emissions or land use.

Second, we need to consider the impacts of wildlife and coastal communities based on cumulative impacts, if this project isn't built and other clean energy products are not built and we're not meeting our greenhouse gas emission targets. Third, if this project is perhaps the best way to meet our energy needs, then we need to consider alternative ways to mitigate the impacts from this project on wildlife and navigation.

Some mitigation efforts could include moving the wind farm further offshore or presenting-- providing better long term monitoring. So including all of these alternatives in the more comprehensive alternatives analysis will lead to two major benefits. One, it will increase the opportunity for public buy-in by making a more transparent process.

This is really important for complex problems like energy development. And by including a more comprehensive analysis, or alternatives analysis, the project will be less likely to be fought later on. Because the public will be better able to use this document to see the decision-making process.

The public will see that the Environmental Impact Assessment did not just consider the impacts of the proposed pre-design project that was already going to happen but will see it in a greater context of the different alternatives that were considered along the way. This will, while spending this money upfront, it will be expensive to do all of these extra studies, it will be important in saving money down the pipeline in delays and litigation.

And second, because there is not much precedent for Environmental Impact Assessments of offshore wind in the United States, we have the opportunity to set the standards for evaluation. This project will set best practices, so let's make them best practices and establish mitigation and monitoring practices as well as the robust alternatives analysis that I proposed.

Again, we should, we should be sure to engage the public around this alternatives analysis during the review of this draft, the comments on this draft Environmental Impact Assessment, so that there's public buy-in and support of the project and that the public understands what alternative options would look like. So finally, we need to recognize that, internally as the EPA, that Environmental Impact Assessments are not unbiased and purely scientific, but that they operate within a political framework.

So because of this and because of our recent decision to limit greenhouse gas emissions in power plants, we need to create a better framework for analyzing alternative energy projects and present a better framework for analyzing all of those impacts and risks. We cannot encourage clean energy development at a great cost to local ecosystems.

But we must create a system in which a sound case for wind generation can be made, including-- So this, by doing this, we need to examine, have an assessment that examines all other options, including meeting energy needs from less clean sources. So for these reasons, I recommend revising the draft Environment Impact Assessment to include these comments. Thank you.