

DOCKETED

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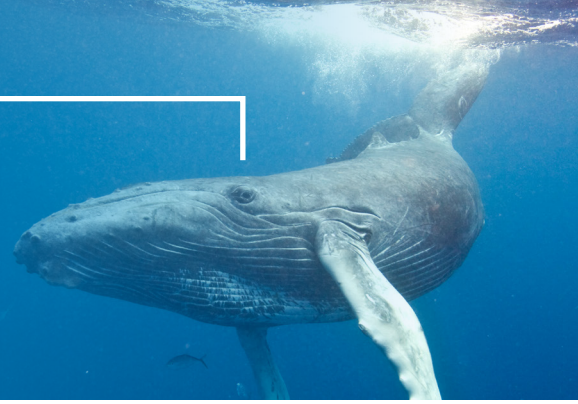
*Comment Received From: Molly Croll
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Offshore & Whales

Providing information related to offshore wind and whales on the East Coast.

Additional submitted attachment is included below.

Offshore Wind is Protecting Whales



There is **no scientific information** connecting offshore wind activities and recent whale strandings.

The offshore wind industry has always been and remains strongly committed to safeguarding the marine environment by taking a number of proactive steps, including establishing and monitoring exclusion zones around vessels, developing the newest mitigation technology, and pausing work during migration seasons.

Here are the facts:

- **There are no ties between the recent whale deaths and offshore wind development**, according to the National Oceanic and Atmospheric Administration (NOAA) and the Bureau of Ocean Energy Management (BOEM).
- **Offshore wind vessel activity currently accounts for around 2% of the tracked traffic** in the waters from North Carolina to Southern New England.
- **More humpback whales are returning to these waters.** The humpback population off the coast of New England, New York, and New Jersey is an Endangered Species Act (ESA) success story, having been delisted from the ESA in 2016. Recent NOAA Stock Assessment for the population estimates an annual growth rate of 2.8%.
- **Offshore wind activity presents low risk to marine mammals**, and the industry takes additional steps to mitigate those risks by carefully tracking and monitoring the marine environment, and adjusts activities to minimize the risk to whales.

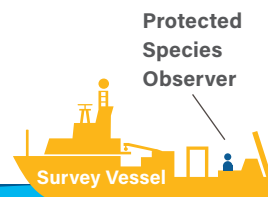
“ I want to be unambiguous: There is no information supporting that any of the equipment used in support of offshore wind development could directly lead to the death of a whale,” said the Deputy Chief for Permits and Conservation with **NOAA Fisheries Office of Protected Resources**. “There are no known connections between any offshore wind activities and any whale strandings.”

“ Shifting blame [for the recent strandings] on offshore wind development is not only irresponsible but dangerous. Offshore wind is one of the solutions to curb the impacts of climate change on our oceans and marine wildlife,” said the **NJ Sierra Club** Director. **13 environmental non-profit organizations** issued a statement supporting the development of offshore wind projects as a key solution to protecting endangered species.

“ Lead Biologist at **BOEM’s Office of Renewable Energy Programs** stated that none of the surveying work being done now off New Jersey and New York has been shown to seriously harm whales, and noted that “we have no documented cases of [any whale behavioral changes from surveys] actually occurring in the field.”

Steps the industry takes to mitigate marine mammal risk:

- Operating all vessels under seasonal speed restrictions to protect whales. No other marine sector conducts this level of mitigation and monitoring for marine mammals during vessel transit.
- Establishing “exclusion zones” around survey vessels, monitored by trained protected species observers, to ensure the area is clear of any marine mammals while surveys are being conducted.
- Shutting down survey equipment when marine mammals approach a vessel, and using ramp-up procedures to ensure animals have an opportunity to move away from surveys before they begin.
- Reporting all marine mammal observations to federal regulators, creating a large and valuable dataset that would not be available without offshore wind activity.
- Funding most active real-time monitoring buoys south of Cape Cod, and helping fund initiatives to create the first large [passive acoustic monitoring network](#) for marine mammals on the East Coast.



A **protected species observer** monitors the exclusion zone for species and calls for immediate shut down of survey equipment if marine mammals or sea turtles are detected within the exclusion zone.

Exclusion Zone

An **exclusion zone** must be established for survey work, where it must be clear of marine mammals and sea turtles for a certain amount of time before survey work can operate.

Clean Energy Opponents Are Wrong About Whale Deaths

"Conspiracy theory at sharp odds with science"

Read more about which clean energy opponents are spreading "**conspiracy theories**" about offshore wind in the media, and hear what the actual experts have to say:

AXIOS Washington Whale Wars

- "[Congressman Jeff] Van Drew [R-NJ] said he is crafting a bill to ban offshore projects... inspired by an outcry from some environmentalists, fishermen and coastal towns about dead humpback and critically endangered right whales recently washing ashore."
- "Reality check: It's a conspiracy theory at sharp odds with science that won't manifest into a law anytime soon...[Van Drew's] anti-wind effort is rooted in a false premise."
- "Experts say there are many other reasons whales are vulnerable, including [shipping vessels](#), [fishing gear](#), [climate change](#) and [whaling from more than a century ago](#)."

NEW YORK TIMES Why 23 Dead Whales Have Washed Up on the East Coast Since December

- "Some of the loudest voices drawing attention to the uptick in whale deaths are longtime opponents of offshore wind energy, who have found in the gruesome images of rotting whale carcasses a new 40-ton mascot...Over the last month... [conservative talk-show hosts](#) and dozens of Jersey Shore mayors have called for an immediate [moratorium on wind-energy projects](#)."
- "Several local groups have found common cause with national organizations, including the Caesar Rodney Institute, a right-leaning nonprofit that David T. Stevenson helps to lead."
 - 'If an emotional response is what it takes,' [Stevenson] said about concern for the whales, 'I'm not going to turn them down!'
- "Online pandemic buying habits are also fueling a record-setting surge in cargo shipments that last year made ports in New York and New Jersey the nation's busiest. Much of the merchandise is now toted on far bigger ships — some of which have altered their routes to help alleviate the supply-chain chaos that last year left some store shelves bare."
 - "As a result, more whales appear to have found themselves in the direct path of more ships."

Whale Deaths Exploited In 'Cynical Disinformation' Campaign Against Offshore Wind Power, Advocates Say

- "A dozen New Jersey beach town mayors and several other groups now argue offshore wind power activity could be the cause of recent whale deaths and wind projects must be stopped while scientists investigate."
- "But those most vocal about their concern have been silent in recent years as whale strandings surged along the East Coast."
- "Experts point to the United Kingdom, which has 2,652 offshore wind turbines and where experts say autopsies have not found a connection between dead whales on their shores and the turbines off them."

Claims About Offshore Wind Farms Killing Whales Are Unsubstantiated, Scientists Say

- "To date, no whale mortality has been attributed to offshore wind activities," Lauren Gaches, a spokesperson for **NOAA Fisheries**, said in a late January media teleconference.
- "On Feb. 21, the **U.S. Marine Mammal Commission** provided an update, reiterating that "despite several reports in the media, there is no evidence to link these strandings to offshore wind energy development."

Wind And Whales: 'No Evidence' Links Projects To Deaths

- A news story on Feb. 13, "made strenuous attempts to link a dead right whale to Dominion Energy's Coastal Virginia Offshore Wind project, which currently consists of two small test turbines about 27 miles off the coast of Virginia Beach."
- "However, according to several federal agencies and scientists, there's no connection between offshore wind development and what the National Oceanic and Atmospheric Administration calls an **"unusual mortality event" that's been afflicting whales up and down the East Coast, from Maine to Florida, since 2016, before the vast majority of Atlantic coast wind development began.**"