



From: Craig Rucker, President
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To: <https://www.regulations.gov/document/BOEM-2024-0001-0001>

Re: Draft Programmatic Environmental Impact Statement (PEIS) to analyze the potential impacts of wind energy development in six lease areas of the New York (NY) Bight.

Upon analyzing the draft PEIS, it is CFACT's position that The Bureau of Ocean Energy Management's (BOEM) first, multi-site, offshore wind PEIS is derisory and laughable.

After numerous requests going back several years, the BOEM has finally published a draft PEIS for a combination of coming offshore wind projects. In this case, the PEIS is for a cluster of six, large projects in what is called the New York Bight.

In principle, this PEIS should identify and assess those impacts that arise from the combination of projects over and above the individual project impacts. In fact, it does nothing of the sort, and the result is simply ridiculous.

Most of the approximate 800 pages are merely an academic discussion of the general environment listing the kinds of impacts that might or might not occur and what may or may not be done about said impacts. There is basically no discussion at all about this specific combination of projects presented in the PEIS.

The greatest concern is that the combined, excessive noise created by these six projects will severely harm whales and other protected species. This is especially true for the incredibly loud clangor made from driving the monstrous monopiles that hold up the enormous wind turbines into the waterbody's floor. Construction of all six projects may occur simultaneously, further exacerbating the cacophony.

On this matter, the PEIS is absolutely absurd. It is structured like a project environmental impact statement (EIS), so the pile-driving impacts are supposedly addressed in a technical appendix on "acoustics;" in this case, it is "Appendix J: Introduction to Sound and Acoustic Assessment."

The operative word in the appendix title is “Introduction,” as it is basically an academic treatise. In fact, it starts off by explaining at length how underwater sound is measured. We do, finally, get to the Bight, but that is about as far as the discussion goes. What we find, instead, is a regurgitation of an academic paper that bears no resemblance to the six projects this assessment is supposed to be addressing

To begin with, the draft uses just two, theoretical sites with a mere 60 turbines each, for a total of 120 turbines. BOEM says these six, real sites are expected to develop up to 7,000 MW of generating capacity, and recent site designs use 13 MW turbines which would require approximately 540 turbines or almost five times as many as discussed in the draft.

Furthermore, the PEIS study uses noise levels from small, 6 MW turbines. At that size, we are discussing a sum closer to 1,200 turbines or roughly ten times as many as are considered. The potential impact of 120 turbines is clearly not helpful in assessing 1,200.

To make matters worse, the pile driving noise level referenced in the study is for driving a roughly 20-foot diameter pile, which is very small by present and future standards. Today's 13 to 15 MW turbines use piles closer to 40 feet in diameter. Moreover, gigantic, 20 MW turbines have just been introduced which might take 60-foot diameter piles.

The noise level is based on the energy of the pile-driving hammer, and bigger piles require a greater amount of energy to drive, so there is a significantly greater amount of noise, realistically, than what is accounted for in the draft. One wonders why BOEM did not measure the noise from the much bigger piles that were being driven back in July just off Rhode Island? The answer seems to be that BOEM did not want to put any serious work into this PEIS.

In short, the academic acoustic case considered in the PEIS tells us absolutely nothing about the potentially immense noise impact of the six projects supposedly being assessed. There is, quite literally, no environmental impact assessment here.

This vacuum seems to hold for virtually the entire PEIS with no real assessment of the six projects. There is certainly nothing of substance on noise.

As environmental impact statements go, this one is essentially useless.

Thank you for taking the time to read over our critique and assessment of the draft PEIS to analyze the potential impacts of wind energy development in six lease areas of the New York (NY) Bight, and it is our hope that you will give this assessment serious consideration before any further action is taken.