

North Atlantic Clam Association

David H. Wallace

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Re: Comments from North Atlantic Clam Association for New Jersey BPS on

NJ Wind Energy Strategic Plan

Offshore Wind Solicitation Guidance Document

Governor Murphy's comments on Offshore Renewable Energy

"The development of New Jersey's offshore wind infrastructure will create thousands of high-quality jobs, bring millions of investment dollars to our state, and make our state a global leader in offshore wind development and deployment. The Offshore Wind Strategic Plan is a critical blueprint that will guide us toward our goal of 7,500 megawatts of offshore wind power by 2035 and help us achieve 100 percent clean energy by 2050."

North Atlantic Comments:

The surfclam and ocean quahog along with the rest of the offshore fishing industry are not being treated fairly in the development of off shore wind. In both the New Jersey Wind Energy Strategic Plan and the second Offshore Wind Solicitation documents fishing is addressed but in such general terms that the developers only give the fishing industry lip service and then do as they please. **Neither the federal nor state governments do anything to protect the offshore fisheries by implementing two times two NM turbine spacing and transit zones requirements in their power purchase agreements.**

Because the states do not want the offshore wind near land the leases are being placed in the offshore fishing grounds. The fishing industry has been supported verbally by Governor Murphy but the requirements on the wind farm developers is so lax that they are taking thousands of square miles of fishing grounds from the fishermen. This document is to comment on the proposed Strategic Plan and the Offshore Wind Solicitation Document. They both have the same problem, they do not protect the fishing industry and the New Jersey fisheries will be badly hurt. The surfclam and ocean quahog fishery will be hurt the worst. That is because the leases are placed in the areas that the fishery actively works. It is also, where in most years, there are good sets of young clams. Clams unlike finfish do not move, so they cannot swim out of the area in which they live. However, the developers want to place their turbines close to each other making it difficult if not impossible to work safely once the wind farm (s) are built. The clam fishery has asked the developers many times to spread out their turbines, but they always say that it is too expensive and it would reduce their income. The developers could care less that they are cutting out those boats that fish for clams, which provide their income in the lease area. It is outrageous to have European companies take over U.S. fishing grounds and put American vessel owners and crews out of business in their own country with no consideration.

The developers do not want boats or fishermen in their wind arrays, as they have in Europe where in most cases no boats of any kind are allowed within their array except their vessels. All of the developers are working to make sure that they get the same outcome here. If the facts were known, they would not want any vessels working in their array or transiting through it.

The 7500 MW of wind energy is a miss representation of the facts to the ratepayers of New Jersey (NJ). Since ocean wind turbines are at best less than 40 percent efficient, the obvious conclusion is unless the state want to be in darkness, there must have other power sources to keep the states operating for the other 60 percent of the time when wind turbines are down. One power source that may not be helpful is solar, it produces power about 50 percent of the time, and it is more predictable than wind, but still short of being a base power supplier. There are two options to deal with the wind and solar down times. They are a storage system or on line power generator such as nuclear power plants that can carry the load 24/7 when necessary. It may be possible to import nuclear power from outside sources or build more nuclear power plants. The reality is that if NJ were to contemplate that a storage plan like pumping water up hill and then releasing it through a turbine when to wind and solar cannot carry the load, they need more than 200 percent of the turbine/solar capacity to power the grid and at the same time recharge the storage source. No one would design a system that is so inefficient as to require 200 plus percent of the electric power demand because wind and solar only function less than 50 percent of the time. The fact is that conventional power plants must be on line all the time. Plus, in most cases system must have surplus capacity above maximum demand so when one power source is down the other sources can carry the load. The state and grid operator understand the situation, why do not they say it. **Windmills and solar arrays are not the solution, they are the problem.**

According to the Strategic Plan, the chart found on page 73, Figure 6-2 the estimated power demand for the next 30 years is as follows:

FIGURE 6-2: ELECTRICITY GENERATION, LEAST COST SCENARIO, sources of electric supply and demand for 2020 at about 75 TWh, then 120 TWh by 2035 and 160TWh by 2050, where is the power going to come from?

For 2020 Demand 75TWh

Nuclear 33%
Fossil Fuels 62%
All others 5%

For 2036 Estimated Demand 120TWh

Nuclear 24%
Fossil 26%
NJ Solar 25%

Off shore wind 10%
PJM Grid Imported 15%

For 2050 Estimated Demand 160TWh

Nuclear 15%
Bio Fuels and Misc. 5%
NJ Solar 30%
Off shore wind 30%
PJM Grip Imported 20%

According to the chart, in 2020 nuclear makes up about 33%, fossil fuels make up over 62% with 7% to other sources for about 75TWh demand. Nuclear is estimated to be flat at about 25 TWh until 2050 which means that the lights will be out often when the solar is off in the dark and the wind drops out there will not be enough production to keep the state supplied without importing large amounts of electric. If the chart on page 73 is correct in 2050 the demand will be about 160+TWh with a constant supply of about 25 TWhs from nuclear and a few TWh from bio fuels. All the rest is scheduled to be provided by solar and wind production, which is high variable. The additional requirements must be imported wind, solar and other sources of power from other areas and possibility from fossil fuel power plants. The lack of rules on wind developers is not going to solve this problem but it surely will affect negatively on the fishing industry if something is not done.

The point is that except for nuclear power plants, there is no other available carbon free power source at this time that can carry one hundred percent of the electric load 24/7. All of the power companies including the ocean wind developers know this, but they will not say it because the developers cannot justify their policy of harming all of the other ocean users. Climate change is a problem, wind turbine farms and solar arrays are not the solution.

The fishing industry has met with the wind developers for years. They take our names and put them on a list, of who they have talked too. They do not report to BOEM or the states what the fishing industry is stating that the fisheries need to maintain reasonable access to their fishing grounds. There is not one thing that the developers have done to help protect the fishing industry. **Governor Murphy said that the wind farm developers and the other users of the ocean need to coexist, that is not happening.** Therefore, the wind developers should not be issued a power purchase agreement until they have transparently put fourth an acceptable agreement with the fishing industry and other ocean users. Here are U.S. companies with their crews and other employees, which are Americans. The developers are all from Europe and most of their key people are Europeans. Therefore, the ratepayers from New Jersey get huge increased electric bills and the fishing industry get shut out of the fishing their grounds. And, because the developers will not agree to transit zone all of the U.S. vessels must steam miles out of their way to avoid thousands of wind turbines put so close together that vessels cannot safely transit through the arrays so the developers can get the most power out of their lease. The developers say about their concession, "we moved the turbines out from .6 to 1.0 NM because the fishing industry want room to

fish and transit lanes.” What they do not say is they moved the turbines further apart because they now are installing much larger turbines than originally planned. The larger the turbines have longer wakes therefore they need to spread the turbines out to be efficient. The other thing they do not say is that with the larger turbines that can produce more power from the lease than they had originally planned. It had nothing to do with make concessions to the other users. The fishing industry demanded having the turbines, two miles apart, in straight lines and set into the tide, which would allow fishing within the wind farm. This would be enough space to safely fish and navigate through the array in good weather. The developers are greedy and their deceitful actions regarding the fishing industry are dishonest, outrageous and unfair. Therefore, all Americans including the electric ratepayers, fishermen, shipping operators are the losers in this ill thought out concept of 100 percent renewable energy.

This section below was taken directly out of the Proposed Strategic Plan to show that the fishing is not being protected. These wind farms development should not be allowed until the other industries and fisheries, habitat and ocean science studies are done and analyzed. There are no base line studies, but it is suggested that studies be made after construction of the wind farm. However, good science have a preconstruction base line and then the monitoring to see the changes. Without the preconstruction data collection and analyzation the monitoring is for the most part worthless because there is no way to know what changed.

Commercial and recreational fishing in New Jersey constitute a significant part of the economy and are a cultural heritage. Offshore wind represents a once-in-a-generation opportunity to embark on a new industry that is poised to create jobs and economic growth for decades to come as well as address important environmental challenges by offsetting emissions through the creation of clean energy. The commercial and recreational fishing industries are critical, and offshore wind development should consider methods to minimize conflicts while enhancing both industries.

Meeting New Jersey’s goal for offshore wind development will help mitigate the impacts of climate change, which threatens New Jersey’s fisheries. Strategic recommendations and next steps related to commercial and recreational fisheries include:

- Ensure continuation of data collection efforts off the East Coast in support of New Jersey state and regional fisheries management decisions and to form the basis of a long-term marine monitoring program for assessing potential cumulative impacts associated with offshore wind development. Determine what survey methodology changes and/or project siting recommendations could be implemented to maintain the continuity and long-term consistency of assessment programs.
- Collaborate with other states, academic, and environmental entities, and use regional, multistate, and multisector collaborations to develop and conduct regional fisheries monitoring and data sharing.
- Leverage existing commercial and recreational fisheries that currently provide valuable information on existing conditions to conduct ecological monitoring in support of construction and operations of offshore wind farms.
- Utilize the New Jersey Offshore Wind Environmental Resources Working Group to continue engagement between the state and the commercial and recreational fishing community throughout each project’s life cycle and request that developers and the state identify fishing industry liaisons. Establish cooperative research initiatives to provide a means for commercial and recreational fishers to become involved in the collection of important fisheries information to support the development and

evaluation of fisheries management. COMMERCIAL AND RECREATIONAL FISHERIES STRATEGIC
RECOMMENDATIONS NEW JERSEY OFFSHORE WIND STRATEGIC PLAN 50

- Implement harbor management plans²⁴ for facilities located in areas with significant commercial fishing operations to determine any impacts on dock access, fuel access, or other activities that may interact with fishing operations.
- Enhance communication and coordination between fishing communities and state and federal agencies through the Offshore Wind Environmental Resources Working Group.
- During project design and layout, assess the need for one or more fairways in lease areas for commercial and recreational fishing vessels.
- To the extent practicable, make choices that maintain access to and transit through wind energy areas by the users who currently rely on them, including fishing and transit without compromising project safety and efficiency.
- Ensure that interconnect and transmission cables are buried to a depth sufficient to avoid interaction with benthic fishing gear and inspect them regularly to ensure adequate cover.
- To the extent practicable, incorporate habitat enhancements to attract commercially targeted species and provide long-term benefits to commercial and recreational fisheries.

As you can see there is nothing in this section that helps or supports the fishing industry.

Thank you for considering the North Atlantic Clam Association's comments.

Sincerely,

David H, Wallace,

For,

North Atlantic Clam fishery,