

August 30, 2021

Program Manager
Office of Renewable Energy
Bureau of Ocean Energy Management
Submitted electronically to docket BOEM-2021-0050-0001

Re: Southern Alliance for Clean Energy Comments on Kitty Hawk Offshore Notice of Intent to Prepare an Environmental Impact Statement

The Southern Alliance for Clean Energy (SACE) is a regional organization that promotes responsible and equitable energy choices that ensure clean, safe and healthy communities throughout the Southeast. We are strongly supportive of responsibly-sited offshore wind energy as an emissions-free power source and we appreciate the opportunity to comment on the notice of intent to prepare an environmental impact statement (EIS) for the Kitty Hawk Offshore wind project.

The United States Should Achieve 100% Clean Electricity by 2035 And Offshore Wind Is A Key Part Of The Equation Of Getting There

Science indicates that it is necessary to get our economy to zero carbon emissions by 2050 to avoid the worst impacts of the climate crisis. Perhaps our best way to meet this target is to get the electricity sector to 100% clean by 2035, which would then serve as the foundation for decarbonizing other sectors such as transportation and buildings as they switch from being fossil-fueled to electrified. A 100% clean power grid, combined with electrification of the nation's vehicle fleet, buildings, and some industry, would achieve emissions reductions of 70-80%.

Decarbonizing the power grid by 2035 will require a variety of strategies and resources, and offshore wind energy is one important part of the equation. Offshore wind energy provides a power generation profile that is complementary to other clean energy sources that will be needed to assemble 100% clean energy portfolios and operates at higher capacity factors than the most common other clean energy sources.

The Kitty Hawk project could serve as a large contributor of the emissions-free energy that is needed to transition away from polluting fossil fuels and to a clean energy economy.

Offshore Wind Development Is Good For Public Health, Jobs, And The Economy

Expert studies show that transforming the power sector to clean energy, while electrifying transportation and buildings, would prevent hundreds of thousands of deaths over the next 30 years nationwide and avoid \$1 trillion or more of public health and environmental damages.¹ BOEM will be able to show more specifically what contribution the Kitty Hawk project could play in this public health benefit using the AVERT (Avoided Emissions Generation) and COBRA (Co-Benefits Risk Assessment) tools in the EIS.

Offshore wind benefits the economy and jobs. The Kitty Hawk Construction and Operations Plan states that the project is expected to generate nearly \$2 billion dollars in total economic impact over the next decade in Virginia and northeast North Carolina, increase total net household earnings by nearly \$390 million in Virginia, generate \$100 million in tax revenue for the Commonwealth of Virginia

¹ Dan Esposito, Energy Innovation (July 2021). *Studies Converge on Benefits of a Rapid Clean Energy Transition*. <https://energyinnovation.org/publication/studies-converge-on-the-benefits-of-a-rapid-clean-energy-transition/>

and the City of Virginia Beach, and create approximately 800 construction jobs and support 900 full-time equivalent new jobs during the operations phase.²

The EIS Must Take Into Account the Best Available Information, and Explore Reasonable Alternatives and Mitigation Measures To Protect the Environment and Reduce Use Conflicts

Offshore wind development must be done responsibly so that development can occur without unnecessary negative impacts to the environment or communities. In order to avoid negative impacts as much as possible, the EIS must use the best available information and ensure thorough identification and analysis of all environmental, social, cultural, and economic impacts, as well as potential alternatives, mitigation measures, and monitoring requirements.

Again, we appreciate the opportunity to comment on this notice of intent and look forward to engaging further in the North Carolina offshore wind development process.

Sincerely,

Chris Carnevale
Coastal Climate & Energy Manager
Southern Alliance for Clean Energy

² Avangrid Renewables (July 26, 2021). *Kitty Hawk Offshore Construction and Operations Plan*.