



OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

3500 DEFENSE PENTAGON
WASHINGTON, DC 20301-3500

SUSTAINMENT

15 December, 2020

David MacDuffee
Chief, Projects and Coordination Branch
Bureau of Ocean Energy Management (BOEM)
Office of Renewable Energy Programs

Reference: Attachment (1) (U) DON Assessment NY Bight Offshore Wind Call Areas (U)

Dear Mr. MacDuffee,

As requested, the Military Aviation and Installation Assurance Siting Clearinghouse coordinated within the Department of Defense (DoD) a review of the New York Bight Offshore Call Areas, 83 Federal Register 15602. The results of our review identified concerns for United States Air Force (USAF) Weather Division, the North American Aerospace Defense Command (NORAD) homeland defense radar and the Department of the Navy (DON).

Development in the NY Bight Call Areas will adversely impact the U.S Air Force Weather Divisions NEXRAD weather radar by limiting the ability to track tropical storms moving towards the area if turbines are built in the Hudson South area at a turbine height above 1000 feet. Mitigation would include utilizing any of the other potential build areas or having turbines in Hudson South that are shorter than 1000 ft. above sea level.

- USAF POC: Lt Col Joseph Coughlin (joseph.d.coughlin.mil@mail.mil); 571-256-8086 or Mr. Robert Kraetsch (robert.c.kraetsch.civ@mail.mil; 703-693-8834

Also, the project will adversely impact NORAD's missions by hampering or degrading air surveillance radar performance. DoD requests BOEM coordinate efforts with the developer and NORAD in de-conflicting these potential impacts such as moving the project beyond the Radar Line-of-Sight, adjusting project to ensure overlapping coverage or aid NORAD in seeking voluntary contributions from the developer to perform Radar Adverse impact Management protocols on each radar after the project is operational to mitigate the adverse impacts resulting from wind turbine-radar interference.

- NORAD POC: Frederick Shepherd: frederick.l.shepherd.civ@mail.mil; 719-556-3260

Lastly, the DON has identified impacts to current and future training. In the Hudson South Call Area, the DON has identified 62 western and northernmost lease blocks totaling 255 square miles, approximately 37% of the Call Area and 12% of the total area proposed for leasing, that directly support or provide a buffer for current and future training requirements that would be hazardous to conduct with vertical obstructions (See Attachment (1)). This includes eight (8) lease blocks where the DON previously indicated development may have been compatible during the 2017 mission compatibility assessment of the Atlantic Coast. The remaining 63% of the Hudson South Call Area, 105 lease blocks totaling 698 square miles, may support wind energy development without significantly degrading the military mission subject to site-specific stipulations. This potentially suitable area encompasses the majority of the draft wind energy area identified at the BOEM Task Force Meeting, including all of the southern and easternmost lease blocks. The DON assessment of the Fairways North, Fairways South and Hudson North Call Areas has not changed, with all but one lease block in Hudson North potentially suitable for development subject to ongoing coordination with the DON.

Encroachment is often irreversible and as the New York Bight continues to see increased density of offshore wind energy development, few areas will remain free and clear to support DON training activities. Therefore, the DoD requests BOEM defer leasing all remaining unleased portions of W-107B/C as well as lease blocks in W-107A within 30 nautical miles of the New Jersey coastline if BOEM moves forward with leasing in the Hudson South Call Area. Any vertical obstructions in these areas would foreclose the DON's ability to safely conduct training missions in the region such as low-level rotary wing aircraft operations.

- DON POC: Matthew Senska: matthew.senska@navy.mil; 703-614-2201

Thank you for the opportunity to coordinate on the New York Bight Call Areas. We are providing the contact information for the affected missions to facilitate open discussion, but the Clearinghouse retains oversight when you require DoD input. If you have any questions, please contact me at steven.j.sample4.civ@mail.mil or at 703-571-0076.

Sincerely,



Steven J. Sample
Executive Director
Military Aviation and Installation
Assurance Siting Clearinghouse

Attachment (1)

DON Assessment NY Bight Offshore Wind Call Areas

