Response to Draft Proposed Sales Notice

South Carolina Perspective

BOEM Carolina Long Bay Task Force
July 21, 2021
South Carolina Offshore Wind Energy Activities

SC has been exploring the possibility of offshore wind development for over a decade

Past and current research includes:

- State-of-the-art wind mapping
- Anemometer stations
- SODAR studies for offshore use
- Comprehensive marine spatial mapping

Extensive study of offshore wind potential through a consortium of researchers & industry

~ $46M in competitive federal funds
Dominion Energy Innovation Center

The world’s most-advanced wind-turbine drivetrain testing facility

• Full-scale highly accelerated mechanical and electrical testing of advanced drivetrain systems
• $98M facility - combination of DOE grants, private and state contributions
• Located in North Charleston, SC
• Houses both 7.5 MW and 15 MW test rigs

Strong manufacturing base

• SC Offshore Wind Economic Impact Study
• 48 companies identify as supplying OSW
South Carolina Offshore Wind Energy Activities

SC Wind Farm Feasibility Study Committee
Coastal Clean Energy Regulatory Task Force
BOEM’s SC Renewable Energy Task Force
(2012 – 2016)

- 5 Task Force Meetings
- Identification of Call Areas
- Call for Information and Nominations
- NOI to Conduct an Environmental Assessment
- Public Scoping Meetings
5 years since last engagement in South Carolina

Significant population growth in the coastal areas of South Carolina over the last 5 years

Myrtle Beach fastest growing place in US 2021 (US News and World Report)

Potential gap in understanding benefits, impacts, interest, and opinions

- Recommend that BOEM include safeguards in the PSN by requiring lessee to engage in meaningful outreach with ocean stakeholders and the public to ensure that their voices are heard.

- Recommend that BOEM conduct a Supplemental Environmental Assessment and voluntarily afford consistency review and comment by South Carolina stakeholders and resources agencies regarding any potential benefits or impacts to our state as a result of leasing activities.
Response to Draft Proposed Sales Notice
A. Size, Number, Orientation, and Location of Lease Areas

*Proposed: Single lease of the Wilmington East WEA.*

*BOEM seeks input on potential portioning for up to three leases; and whether portions of the Lease Area should be prioritized for inclusion or exclusion.*

- South Carolina tourism officials have concerns regarding visual effects from turbine arrays and potential impacts to the overall state tourism economy.

- Recommend that Lease Areas be limited to those which result in minimal or no visual impacts from South Carolina’s shore.

- Recommend that the number and size of Lease Areas be such that they provide for beneficial competition while minimizing conflicting maritime uses and impacts to resources.
A. Size, Number, Orientation, and Location of Lease Areas

*Proposed: Single lease of the Wilmington East WEA.*

**BOEM seeks input on potential portioning for up to three leases; and whether portions of the Lease Area should be prioritized for inclusion or exclusion.**

- Orientation of Lease Areas should ensure shipping safety especially for vessel traffic from South Carolina Ports to destinations in the Mid and North Atlantic.

- BOEM should engage the SC Military Base Task Force to ensure necessary input into national security considerations for location and orientation of Lease Areas.
B. Transit Corridors

*BOEM seeks input on need to include defined transit corridors within the proposed Lease Area.*

- Defined corridors should be included within the PSN. These corridors are important not only for commercial and recreational fishing interests but to ensure that all maritime industries are afforded safe navigation through and around the turbine arrays.

- Concerned that this leasing process may not provide time for a robust dialogue with the South Carolina’s fishing and maritime industries to ensure that the defined transit corridors will be properly located for South Carolina interests.

- Recommend that BOEM require the lessee to conduct additional targeted engagement with the commercial and recreational fishing industry and other maritime stakeholders in South Carolina to assess the optimal layout for access and transit, and determine if corridors need to be modified to address conflicts.
C/D. Benefits to Underserved Communities

Proposed: Lease options to direct benefits to underserved communities by providing workforce training and development, contracts with minority and women-owned businesses, and environmental justice programs.

- Given the proximity of the Lease Area to South Carolina’s border/shoreline, it is recommended that BOEM require the lessee to provide a portion of the workforce training and development and other benefits to South Carolina communities.
E. Domestic Supply Chain

Proposed: Lease options to incentivize a durable, domestic supply chain conductive to prompt and orderly wind energy development of the Lease Area.

- Offshore wind is a relatively new market within the US, and US-based companies are operating at a disadvantage to their foreign counterparts. European companies have existing relationships with developers, proven experience in the industry, and existing manufacturing capacities. (Congressional Hearing of the Offshore Wind Caucus July 15, 2021)

- We encourage BOEM to consider lease options that would strengthen competition of US-based companies, especially those within South Carolina, through support of US manufacturing, improved workforce training, port infrastructure, and supply chain development.
F/G. Stakeholder Engagement

Proposed: Lease stipulations requiring coordinated engagement with Native American Tribes and Ocean Users. Require coordination by the lessee with fishing industry and consideration of potential conflicts prior to proposing a wind turbine layout. Require reports to stakeholders of engagement activities and efforts to minimize conflicts between existing users and the lessee.

- South Carolina strongly recommends that BOEM require the lessee to provide stakeholder engagement for all ocean users that may be conflicted with the Leasing Area and associated wind energy development activities.

- Leases and potential development should fully consider all commercial and recreational fishing and other maritime interest, as well as habitat and natural resources, and seek to minimize impacts and maximize compatibility.
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- Recommend that the coordinated stakeholder engagement be conducted in a manner that provides the maximum participation and input - virtual options as well as in-person meetings.

- Support requirement that the lessee report a summary of their stakeholder engagement efforts. Recommend that BOEM consider a threshold for resolution or requirements for mitigation should conflicts not be resolved.
H. Prescribed Layouts

*BOEM seeks input on whether to prescribe uniform and aligned layouts to negate the need for established transit corridors.*

- Prescribed turbine layouts do not ensure that concerns of fishing and maritime industry have been addressed, access to and transit through the Lease Area has been afforded, or conflicts have been minimized.

- Recommend that BOEM require the lessee to conduct targeted engagement with the commercial and recreational fishing industry and other maritime stakeholders in South Carolina to ensure the optimal layout (including transit corridors) for access to and transit through arrays.
Transmission Cables / Landfall

*BOEM does not include reference to onshore connections or transmission cable layouts within the PSN.*

- Recommend that BOEM require lessee to engage state and federal agencies and local governments in the location of landfall routes, if these routes will impact areas off South Carolina’s coast. Specifically, routes should avoid trawl areas, sand borrow areas, and other areas of valuable coastal resources and use.

- BOEM should make lessee aware that cable and/or landfall projects within South Carolina’s jurisdiction will be reviewed under state regulatory programs which may require additional permits and mitigation.
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