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Comment On: BSEE-2026-0034-0001
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Renewable Energy and Alternate Uses of Existing Facilities on the Outer Continental Shelf

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General Comment

The Coastal Virginia Offshore Wind project uses Siemens Gamesa SG 14-222 DD direct drive turbines. These turbines use 308352 gallons of oil across 176 turbines, which is roughly 1752 gallons of oils, lubricants and hydraulic fluids per turbine spilling into the Atlantic Ocean and Chesapeake Bay. Please recall these turbines for a carbon and emissions review.

A recently-surfaced letter from a whistleblower indicates that BOEM and NOAA were aware in May 2022 that offshore wind construction and operation posed a direct danger to the North Atlantic right whale and such construction poses a danger to ALL marine species, including the whitetip shark.
The author, NOAA's own Chief of Endangered Species, Dr. Sean Hayes, bravely sounded the alarm, noting that not only the construction but also the operation of wind turbines could result in extinction.
Yet these agencies have failed to put in place any meaningful measures to protect this critically endangered species from extinction.
By NOAA Fisheries' own admission, "The potential biological removal (PBR) level for the species, defined as the maximum number of animals that can be removed annually while allowing the stock to reach or maintain its optimal sustainable population level, is less than 1." In plain language, this means the death of a single whale could make the difference between extinction and recovery.
Recent data collection finds the whales are increasingly relying on the southern Massachusetts wind lease area as a last refuge for foraging and raising their young. Because the federally-designated critical right whale habitat is out of date, these very same areas have been approved by the federal government for industrialization by offshore wind companies.
For a long time it was unclear what effects the plants' construction and operation might have on whales. Several groups including our coalition raised the alarm and called for a moratorium until more studies could be conducted.
In response to these concerns, NOAA Fisheries and the Bureau of Ocean Energy Management (BOEM) in

October this year released a draft joint strategy to “to protect and promote the recovery of North Atlantic right whales while responsibly developing offshore wind energy.” But this strategy is misleading – the authors frame their plan to meet their obligations under the Endangered Species Act as a mere “vision,” and there is little evidence that the proposed mitigation measures are effective, practicable or backed up by sufficient funds.