

Ensuring Compatibility Between Offshore Wind and Military Readiness

From the earliest days of offshore wind in the United States, the Bureau of Ocean Energy Management (BOEM), which permits energy infrastructure in federal waters, and offshore wind developers have collaborated with the Department of War (DoW) to ensure lease areas and proposed projects are compatible with military operations, training and readiness. This collaboration is facilitated through the Military Aviation and Installation Assurance Siting Clearinghouse ("Clearinghouse"). Project developers and BOEM consistently work with the military to address concerns and new issues when they arise and have made changes to lease areas and project plans to protect national security.

Background

The Clearinghouse was established in the Fiscal Year 2011 National Defense Authorization Act (NDAA). It serves as a single point of contact for federal agencies, state and local governments and industry to facilitate DoW reviews of proposed energy and transmission projects to ensure they do not interfere with national security needs. The Clearinghouse manages the Mission Compatibility Evaluation (MCE) Process, a mission-specific, project-specific, and technical science-based analysis of potential impacts to military operations. The process relies on the expertise of military stakeholders from individual military bases to Pentagon-level military commands and services. **Analysis is done on potential impacts to military operations, research, development, testing, training, and readiness. DoW considers potential impacts to radars, low-level flight routes and training areas, and vessel navigation, among other military interests.** The Clearinghouse consolidates the DoW input and provides the official DoW position to federal agencies, project developers, and state and local permitting authorities as appropriate.

To date, no projects have been built over a formal objection from the DoW. Dozens of lease area and project changes have been made to address military feedback, and the Clearinghouse has brokered nearly 150 mitigation agreements with project proponents (including both offshore and land-based wind projects) to resolve DoW concerns.

Clearinghouse Coordination with BOEM

For projects on the Outer Continental Shelf (i.e. beyond 3 nm from shore), which is where the offshore wind projects in development today are located, the review process with DoW is embedded from the start. Clearinghouse coordination with BOEM begins as potential lease areas are identified, through their finalization. Once a lease is awarded to a developer, project specific reviews are initiated to ensure project details continue to be compatible with any military activities and assets.

As DoW itself emphasizes their involvement through the offshore wind review and development process noting on the Clearinghouse website that DoW, "coordinates at every stage of planning, permitting, and development throughout the Atlantic, Pacific, and Gulf of America."

Role of DoW in OSW

Given DoW's extensive use of sea- and airspace over the Outer Continental Shelf, offshore wind projects are subject to careful evaluation for military compatibility. Federal law authorizes DoW to identify concerns if a proposed energy project (individually or on a cumulative basis) may have "any adverse impact on military operations and readiness," which is broadly defined to include impacts to "flight operations, research, development, testing, and evaluation, and training that is demonstrable and is likely to impair or degrade the ability of the armed forces to perform their warfighting missions."

DoW participates in BOEM's process to identify Wind Energy Areas and later, specific lease areas, and identifies any DoW conditions that BOEM should include in its lease sale agreement with a project proponent to protect military interests. BOEM has revised as well as removed proposed lease areas from further consideration and development due to feedback from DoW.

DoW then remains engaged once a lease is awarded to a specific company throughout project development, construction, and operation.

The Record of Decision (ROD) issued by BOEM, which represents approval of a proposed offshore wind project, incorporates conditions and mitigations recommended by DoW that are binding on the project developer and formalized in the terms and conditions of the construction and operations plan approval.

Requirements imposed by BOEM based on input from DoW and supported by developers to address DoW concerns have included height limits on turbines in some areas, spacing and layout requirements to accommodate vessel traffic and limit impacts to radar, funding from developers to adjust radar software, and agreements to curtail turbines in the event of a national security emergency, among other commitments.

Offshore Wind Can Benefit Military Operations and Readiness

Not only are offshore wind facilities compatible with military operations and readiness, but they can proactively benefit them. For example, the Navy and Air Force can train in and around wind turbines, which is important given the tens of thousands of offshore wind turbines that have been constructed by adversaries like China. Project developers have committed to pay for and implement electric system upgrades at military facilities. And offshore wind turbines and substations provide structures in the ocean that can host sensors, radars and similar equipment that can expand and enhance the military's visibility.



The Process Works

The offshore wind industry is confident the existing DoW and BOEM review processes fully protects DoW interests and military readiness. As stated by Vice Admiral (retired) **Dennis V. McGinn, former Assistant Secretary of the Navy for Energy, Installations, and Environment and Commander of the Third Fleet**, the DoW review process is "thorough and is solely focused on what is needed to protect the military mission. In my experience, neither DoD nor the individual military services will sign-off on a proposed project that may pose a major impact to military testing, training, or operations."

