

County of Brunswick
Office of the County Commissioners



**BRUNSWICK COUNTY RESOLUTION IN OPPOSITION TO ISSUANCE
OF WIND ENERGY LEASES WITHIN 24 NAUTICAL MILES OF
NORTH CAROLINA'S SHORES**

WHEREAS, Brunswick County has six beach towns across five barrier islands, and approximately 50 miles of beautiful shoreline along the Atlantic Ocean; and

WHEREAS, the natural coastal beauty of our viewshed is an essential driver of our economy; and

WHEREAS, the onshore visual impact of wind energy turbines is overwhelmingly determined by a single causal factor: distance of wind turbines from shore; and

WHEREAS, wind turbines located within the viewshed of Brunswick County beaches would damage tourism and the economy of the county by transforming open ocean views to views of massive industrial machinery; and

WHEREAS, such a change would represent a destructive commitment of ocean resources that could irreversibly damage the natural environment and resources that drive our economy; and

WHEREAS, BOEM knows that wind turbines will have adverse visual impacts if located within 24 nautical miles from shore. BOEM, based on the 33.7 nautical mile buffer BOEM established for Bodie Island Lighthouse; and

WHEREAS, BOEM has established a 24 nautical mile no-leasing buffer for the State of Virginia to protect viewsheds, BOEM has established a 24 nautical mile no-leasing buffer for the Kitty Hawk WEA to protect viewsheds, and BOEM has established a 33.7 nautical mile no-leasing buffer to protect the Bodie Island Lighthouse; and

WHEREAS, the wind energy leases issued for by BOEM for sites within County viewsheds (and as close as 10 nautical miles) still exist and BOEM has stated the leases will have no significant impact on the human environment even though "visual impacts from the installation of a wind energy facility were not analyzed." BOEM Environmental Assessment at p. 5-22. In fact, issuance of leases determine distance from shore and therefore determine the adverse visual impacts of wind turbines. Visual impacts caused by distance from shore must either be eliminated before leases are issued, or must be fully analyzed in an Environmental Impact Statement before leases are issued; and

WHEREAS, BOEM has not analyzed the visual impacts of wind turbines on Brunswick County and will likely not do so until it is too late to reasonably do anything about wind turbine distance from shore. BOEM plans to delay its analysis until the following commitments of resources, among others, have occurred:

- BOEM issues a lease for a BOEM-specified area whose distance from shore is determined by BOEM;
- A wind energy company has submitted a site assessment plan for the BOEM-specified area;
- BOEM has approved a site assessment plan for the BOEM-specified area;
- A wind energy company has completed site assessment activities and has decided to propose a Construction and Operation Plan for the BOEM-specified area;
- A wind energy company develops, completes, and submits to BOEM its Construction and Operation Plan for the BOEM-specified area;
- BOEM receives a Construction and Operation Plan for the BOEM-specified area and BOEM will decide whether to approve, modify, or reject the plan.

At this late stage, as part of BOEM's decision to approve, modify, or reject a Construction and Operation Plan, BOEM plans to analyze visual impacts - impacts that are caused primarily by distance from shore. However, because distance from shore is determined when a lease is issued, the analysis of visual impacts must be either eliminated *before* leasing, or fully analyzed *before* leasing in order to satisfy the requirements of the National Environmental Policy Act and to prevent substantial wasteful expenditure of private and public time, effort, and money on sites that are known to be in unacceptable locations; and

WHEREAS, if an area leased by BOEM is too close to shore, producing unacceptable visual impacts, the County is concerned that (1) BOEM cannot modify a Construction and Operation Plan by specifying a different location than one leased and (2) BOEM will fail to reject a Construction and Operation Plan because of the magnitude of private and government expenditures on a location whose distance from shore was decided prior to those expenditures, when the lease was issued. Conversely, if BOEM, based on proximity to shore and resulting visual impacts, were to reject a Construction and Operation Plan or specify a different location than the one leased, we are concerned that BOEM would fail to successfully defend such a decision; and

WHEREAS, the reasonable and lawful point in the BOEM process to assess or eliminate visual impacts caused by distance of wind turbines from shore is prior to issuing any lease; and

WHEREAS, if BOEM proceeds with leasing in the West Wilmington WEA and the East Wilmington WEA without an EIS, the reasonable, lawful course of action is to exclude from leasing any areas that are within 24 nautical miles of shore and any areas where wind turbines would be visible from Brunswick County shores; and

NOW, THEREFORE, BE IT RESOLVED that Brunswick County respectfully requests that BOEM restrict leasing and approval of site assessment plans in the Wilmington East WEA and Wilmington West WEA to exclude locations within 24 nautical miles of the Brunswick County

shoreline; and

BE IT FURTHER RESOLVED that Brunswick County respectfully requests BOEM to provide at least 30 days written notice to Brunswick County before issuing any lease or approving any site assessment plan that includes any location within the Visual Impact Exclusion Area; and

BE IT FURTHER RESOLVED that Brunswick County is committed to challenge any BOEM issuance of wind energy leases within the Visual Impact Exclusion Area; and

BE IT FURTHER RESOLVED that Brunswick County stands in solidarity with North Carolina coastal communities, and with other communities that may be affected by BOEM wind energy leasing on the continental shelf within 24 nautical miles of the North Carolina shore or within viewing distance from any North Carolina lighthouse; and

BE IT FURTHER RESOLVED that Brunswick County calls upon Governor Roy Cooper, Department of Environmental Quality Secretary Elizabeth S. Biser, and the North Carolina General Assembly to protect North Carolina's beautiful ocean viewshed and North Carolina's proven tourism-driven coastal economy by opposing wind energy leasing on the continental shelf within 24 nautical miles of the North Carolina coast, and within areas where wind turbines would be visible from any North Carolina lighthouse.

This the 2nd day of August, 2021.

Randell Thompson, Chairman
Brunswick County Board of Commissioners

ATTEST:

Daralyn Spivey
Clerk to the Board