### Top 10 Reasons VB City Council Must Push Pause on Kitty Hawk Wind Easements

#### 1. The Protect Sandbridge Beach Coalition is NOT opposing offshore wind development!

- a. While there are many groups actively opposing the rapid development of offshore wind, we support the regional goal of developing Hampton Roads as an offshore wind hub for the East Coast through the *responsible* development of this renewable energy alternative.
- b. We stand in opposition to the proposed grid connection for the Kitty Hawk Offshore Wind Project. The developer, Avangrid Renewables LLC, proposes to land six offshore cables carrying 3.5 gigawatts of total energy into the public parking lot south of Sandbridge market. Those cables would then be split into 3 conductors each resulting in 18 high voltage transmission lines running through Back Bay National Wildlife Refuge and surrounding communities. Twelve of these cables will ultimately terminate at a new substation in Corporate Landing. The remaining six will terminate at or near the Landstown substation.
- c. We are advocating for a critical review of the proposed Sandbridge landfall and subsequent run of high voltage transmission lines through Back Bay National Wildlife Refuge and adjacent neighborhoods and surrounding communities.
- d. There are serious questions and concerns surrounding the Sandbridge landfall and cable routing that remain unanswered. We believe there are grid connection alternatives that have less impact on communities and the environment.
- e. We are seeking to have all questions, issues and grid connection alternatives fully explored before a Sandbridge landfall easement is approved by the Virginia Beach City Council.

# 2. The Hampton Roads Offshore Wind hub is <u>not</u> dependent on the landfall and grid connection location for the Kitty Hawk Wind Project.

- a. A Virginia Department of Energy study on offshore wind opportunities in Hampton Roads, identifies the drivers for economic benefits as focused on the construction, operation and maintenance of the offshore wind farm. Grid connection and landfall location has no bearing on the economic benefits for the offshore wind hub.
- b. According to that same study, The Kitty Hawk Wind project is only 1 of 13 potential offshore wind projects from New York to South Carolina that could be serviced out of Hampton Roads. The total number of potential projects has recently increased to 15 or more with the opening of additional wind energy lease areas on July 31, 2023.
- c. Because grid connection has no bearing on the economic benefits of offshore wind, we believe that grid connection should maximize the utilization of existing grid infrastructure and transmission line rights of way thereby minimizing the impact on people, communities and the environment.
- **d.** We are asking all stakeholders to separate their economic desire for an offshore wind hub from the question of grid connection since the two are unrelated and **join us in our call for less impactful alternatives.**

### 3. The Kitty Hawk Economic Impact study does not address potential negative economic consequences

a. The developer, Avangrid Renewables LLC, has **acknowledged that no independent study was included in their economic impact report**<sup>(1)</sup>. For example, issues like the higher cost of electricity, local impacts on



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- property values and tourism and the cascading impacts these could have in the regional economy have not been quantified.
- b. Sandbridge alone generates approximately \$25 million in rental and property taxes each year. In addition, Sandbridge is host to 200,000 rental guests and contributes over \$200 million in tourism revenues for the city each year.
- c. As a resort community, Sandbridge supports thousands of local contractors and other small business employees from across all districts in the City of Virginia Beach.
- d. **We are asking for an independent economic study of the potential negative consequences** of the Kitty Hawk Offshore Wind Project to balance the economic impact study provided by the developer.

## 4. The proposed landfall may impose risk to the long-term sustainability of the Sandbridge sand replenishment program.

- a. Avangrid Renewables LLC cited the shoreline stability of Sandbridge as a key factor for landfall selection. It saves them engineering and construction expense.
- b. Sandbridge offers shoreline stability through a federal sand replenishment project.). This program is funded by a Special Service District (SSD) **taxation that is imposed only on Sandbridge property owners.**
- c. There have been five renourishment projects completed since 1998. 100% of all local funding for these projects has been provided by the Sandbridge SSD.
- d. Avangrid asserts that the proposed offshore cable will have no impact on current or future offshore sand borrow areas. These sand borrow areas represent the sand inventory needed to sustain the program over the long term.
- e. While Avangrid asserts its cables (which run directly adjacent to the currently designated sand borrow areas) pose no risks to future replenishments, only the US Army Corps of Engineers (USACE) and the Bureau of Ocean Energy Management (BOEM) have the authority to determine that risk. Their assessment of this risk is scheduled to begin in the first quarter of 2024.
- f. We are asking the City of Virginia Beach **to hold off granting Sandbridge easements** to Avangrid until the USACE and BOEM review is complete for both current and future sand borrow areas to ensure there is no conflict with the sand replenishment project.

#### 5. Sandbridge landfall does not offer significant or long-term economic benefits to the City of Virginia Beach

- a. Avangrid has acknowledged that the many potential negative economic impacts were **NOT** included in their economic impact report.
- b. This would include negative impacts on local property values, tourism, electricity prices, and the cascading negative impact of these impacts on the broader Virginia Beach economy.
- c. Once construction of the transmission lines is complete and buried, what permanent jobs will remain?
- 6. The proposed Sandbridge landfall poses substantial negative impacts to both community and environment. Less impactful landfall options are available and should be more thoroughly evaluated.



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- a. Risk impacts to the sand replenishment program will not be known until USACE completes the Section 408 review in late 2024. Only USACE is authorized and qualified to determine the risk to the federal Sandbridge beach replenishment project.
- b. The proposed transmission line route runs along both sides of the future Nimmo Parkway VII-B extension. An environmental impact statement will be required to piggyback the transmission lines through the section of Nimmo Pkwy that transits the BBNWR land, causing further delays.
- c. The proposed transmission line routes will go through the Sandbridge, Lago Mar and Ocean Lakes communities. The construction will result in multiple years of disruption to these communities.
- d. The proposed transmission line will also be routed from Sandbridge to Landstown for the second phase of the project, KHW South. The final routing for this segment has not been established, leaving more unknown community and environmental impacts.
- e. Dominion is the energy utility that operates within the PJM network. *For more information on PJM click HERE*. PJM has established Fentress and Landstown substations as the required interconnection point for NC and VA OSW. Avangrid proposes to connect to the PJM grid. Regardless of the transmission line route, the KHW transmission lines will terminate in Virginia Beach at Fentress or Landstown.
- f. The Dominion substation in Kitty Hawk is less than 1 mile from shore, with an established right of way, and transmission lines towers that run along route 168 to Fentress and Landstown substation. The towers, lines, and substations would require upgrades.
- g. Cost for upgrades could be offset by \$65 Billion in federal funds that are available for grid upgrades that support offshore wind connection and hurricane hardening. These funds could offset the developers' upgrade costs and strengthen overall power reliability for the outer banks.

# 7. The proposed Sandbridge landfall may negatively impact cost, complexity, and schedule of Nimmo Parkway VII-B project.

- a. The federal NEPA process requires that EA or EIS for Nimmo Parkway VII-B must include the environmental impacts of construction, infrastructure, and operation of transmission lines for federal permitting for the section of the parkway that transit BBNWR.
- b. As an example, environmental impacts must be evaluated for hydrologic impacts for the proposed transmission line infrastructure running along both sides of Nimmo Parkway. Furthermore, the large concrete cable ducts structures also dissipate a substantial amount of heat energy into the wetlands.
- c. The KHW and Nimmo VII-B project schedules and EIS will be inextricably linked, adding complexity and dependencies for both projects.
- 8. The developer, Avangrid, should not be allowed to benefit or profit from the beach stability that was funded through local property taxpayer's investment.



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- a. Avangrid has cited the stability of Sandbridge Beach as a key factor in its landfall selection.
- b. The Sandbridge beach replenishment project is supported through taxes paid by Sandbridge property owners through a Special Services District (SSD) established in 1995. To date \$68M has been disbursed for the initial beach nourishment and 4 replenishment cycles.
- **c.** Avangrid, a for-profit entity and outside interest, seeks to benefit from the property-owner funded SSD while putting those stakeholders' interests at risk.

# 9. More information about the project design is required to conduct independent analysis of safe Electric & Magnetic Fields (EMFs)

- a. The underground transmission line infrastructure design though Sandbridge has not been made available to the public (2).
- b. We are asking for an expert independent EMF assessment for the project design envelope from an organization with the expertise and modeling tools required to perform the assessment.

# 10. The developer has provided conflicting information to the city of Virginia Beach and the public about the project schedule and risks<sup>(3)</sup>.

- a. Vineyard Wind parking lot landfall construction was completed in 12 weeks FALSE<sup>(1)</sup>
- b. Sandbridge full lease build out will be completed in one off-season FALSE<sup>(1)</sup>
- c. Full lease build-out (6 offshore cables for KHW North and KHW South) can be completed concurrently FALSE<sup>(1)</sup>
- d. There is no impact to Sandbridge sand replenishment federal program NOT KNOWN AT THIS TIME
- e. A 3rd party study was completed and it agreed with our conclusion that EMF levels will be well-within safe margins MISLEADING<sup>(4)</sup>

#### Notes:

- (1) Source: Email to Virginia Beach City Council from Amanda Mayhew, "Kitty Hawk Wind Responses to Sandbridge Questions" July 13 2023
- (2) https://www.boem.gov/renewable-energy/state-activities/kitty-hawk-north-wind-construction-and-operations-plan-commercial
- (3) Project presentation by Avangrid during May 4th 2023 City Council Briefing
- (4) June 1 2023 Virginia Wesleyan University report did not include engineering analysis or data on EMF levels

