

***Supplemental Public Comments of
Advocates for Safer Shores & Communities
September 9, 2024***

These comments supplement, and provide new information to support, the written comments of July 8 and oral comments at the Public Hearing of July 9 of on behalf of Advocates for Safer Shores & Communities, a group of homeowners and residents in Sussex County. Our focus is public safety, and we are deeply concerned that there has been little or no planning or funding for first responders for emergencies specifically related to bringing up to 6,000 MW of electric power from wind farms through Delaware waters, onshore at 3Rs beach, and laid in a shallow trench across miles of the Indian River Bay.

This risk has been borne out in the days since the July 9 public hearing by the disintegration of a windmill blade - comparable to the size proposed to be used by USWind - at Vineyard Wind off Nantucket. The incident spread debris large and small across waters used by swimmers, boaters and fishers, causing the Town of Nantucket to close 9 beaches. According to the Town's official press release, the debris included nontoxic fiberglass fragments that could be observed floating in the water or hidden beneath the surface, creating a potential danger to swimmers. People walking on the beaches were warned not to touch the fiberglass pieces. (Photos attached).

While the manufacturer, GE Vernova, and BOEM are still investigating the incident, GE has begun to inspect ALL of its turbine blades for manufacturing defects. However, this is not the first time a similar offshore wind blade has collapsed. GE Vernova confirmed that a wind turbine blade fell at the UK Dogger Bank project earlier this year, due to "installation" issues.

Our research, detailed in our July 8 comments and July 9 hearing testimony, reveals that no Delaware state or local governmental entity has identified the proposed wind turbine engines or the high voltage transmission lines in their Threat Hazard Identification Risk Assessment process. Worse yet, no financial or training resources appear to have been dedicated by either the wind project developer or the State of Delaware to the local public safety agencies who will be the first responders to virtually every emergency related to this proposed project.

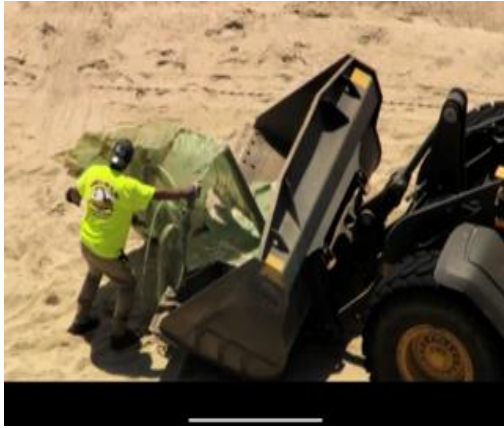
This gaping omission is particularly troubling in that a standard component of most large public and private sector infrastructure projects — a decommissioning bond — is also absent here. US Wind has reportedly persuaded BOEM to postpone any obligation for US Wind’s limited liability company to provide such a bond — which is meant to protect the public, including residents and businesses, from a failure or termination of the project and the need to remove broken or non-functioning wind turbines that would be an eyesore and a potential safety, environmental, and navigational hazard — for 15 years. US Wind’s LLC may be long gone by then. We are not aware that the State of Delaware has asked US Wind for any decommissioning bond in respect of the portions of the project that will cross under or through State and local ocean, beaches, road, and bay, and within a few hundred yards of popular summer fishing and swimming beaches.

In the context of actual, real-world risks and dangers to people, their businesses, and the environment, the “there’s nothing to see here, go about your business” approach of the Delaware state government is disconcerting. DNREC should not race to approve US Wind’s proposal until the emergency planning steps (including those set out in The Threat Hazard Identification Risk Assessment process) and funding have been completed at the State and local level, and an appropriately sized-decommissioning bond posted by US Wind to



protect the State, its citizens, residents and businesses, from failures of the proposed Delaware portion of the project and its impacts in Delaware.





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We have confirmed this is the broken Vineyard Wind turbine blade approximately 15 miles southwest of Nantucket.

Pieces of it are washing up all over the island's south shore this morning



8:54 AM · Jul 16, 2024

