

HearingComments, DNREC (MailBox Resources)

From: DoNotReply@delaware.gov
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Subject: Public Hearing Comments

Comments on Docket #2024-P-MULTI-0007 -- US Wind Project

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Comments:

Copy of our Email sent 8/2/24, for — Public comment for-DNREC Docket #2024-P-MULTI-0007 DNREC has a threshold responsibility to protect the coastal zone(all that area of the State, whether land, water, or subaqueous land.) And uphold the laws of the Delaware Coastal Zone Act. To protect wetlands, bays, and natural resources from industrialization. To enhance wildlife, fisheries habitat, and protect our water quality. Therefore- DNREC has an obligation to deny US Winds permits. And protect our coastal zone from any and all future offshore wind turbine high density polyethylene conduit pipes, gas, liquid, solid product transfer that threatens to enter our Coastal Zone thereafter. Even if submerged power cables are deemed important for energy transition, their carbon-cutting potential must outweigh their direct environmental impacts. And we know this is not the case in the lifespan of turbines or cables. The following studies are direct environmental impacts and permits should be denied: 1. Ecosystem and Electric Magnetic Field (EMF) - The known devastation from construction to commission of the subsea cables to Beach Cove, Fresh Pond State Park, Old Basin Cove, Pastures Cove, James Farm Ecological Preserve, Pastures Cove, Whites Creek, Pepper and Vines Creek, Holts Landing State Park, Indian River Bay, Massey's ditch, and Burton Island is documented in the 2023 report titled- Fisheries and Offshore Wind Interactions: Synthesis of Science <https://repository.library.noaa.gov/view/noaa/49151> (<https://repository.library.noaa.gov/view/noaa/49151>) A 400 pg report- collaborative effort by Bureau of Ocean Energy Management (BOEM), NOAA, Northeast Fisheries Science Center; and the Responsible Offshore Development Alliance (RODA), has a striking array of issues. Unclear studies on EMF's impacts will have on sea life behavior. "the lack of knowledge on the intensities of EMF anticipated from offshore wind cables make it difficult to draw conclusions on the studies to date." (Pg 47) Electromagnetic field around high powered undersea cable can change sea life behavior. And please review Knowledge Gaps (pg217) <https://repository.library.noaa.gov/view/noaa/49151> (<https://repository.library.noaa.gov/view/noaa/49151>) 2. BOEM published and held public meetings indicating marine life that's is highly affected by cable EMFs. These include: all species of sharks, bullnose ray, summer flounder, and sturgeon. Clearly all the species in our watershed. (Ref: BOEM EMF public handout) 3. The Indian River Bay and our coves are home to the medically necessary Horseshoe crab. We count them. We regulate limits. Del. and MD tag them. There are zero (0) studies on the immediate, short, and long term affect's to date. EMF's at any level without proper and clear studies on the benthic zone creatures habitats and breeding grounds is unacceptable and negligent. 4. The diverse turtle population has increased beyond expectations in these locations. Preserve by: 1. billboard-on northbound Coastal hwy. to warn travelers this is a "highly sensitive" area and to be aware. (Note: same location as the potential cable landing site.) 2. fence- along southbound Coastal Highway to prevent turtles from crossing and getting smushed by cars. 3. Undisturbed habitat Drilling through this deemed "highly sensitive" area should not be considered. BOEM's impact statement for US wind (Maryland project) long term effects to our watershed is unknown nor studied to date. 5. Australia's environmental impact assessment confirms ecosystem danger . <https://www.dcceew.gov.au/environment/epbc/publications/key-factors-guidance> (<https://www.dcceew.gov.au/environment/epbc/publications/key-factors-guidance>) Key environmental factors for offshore windfarm environmental impact assessment under the Environmental Protection and Biodiversity Conservation Act 1999 - DCCEEW 6. Scotland's coast- 2021, studies on the Brown crab show extreme environmental impacts.

concerns with species and ecosystem . <https://eandt.theiet.org/2021/10/11/mesmerised-crabs-breeding-habits-inhibited-lure-undersea-power-cables> (https://eandt.theiet.org/2021/10/11/mesmerised-crabs-breeding-habits-inhibited-lure-undersea-power-cables) 7. Recently, Avangrid- Vineyard Wind I project in Massachusetts recorded and documented the levels of one cable EMF's omit on the public's beach and parking lot. MA Dept of Health is asked for additional readings. And Town will be hiring an outside independent 3rd party to conduct and confirm these levels. Town of Covell is now placing public safety signs with cables locations and site to reference for EMF warnings. Possibly preventing people with medical implants, children or pregnant women to visit these public areas. This is discrimination. Marylands cables route and depth is only 6ft below surface and is exactly where people clam and bring their children because of the shallow waters. This depth with humans present and interaction could violate OSHA requirements concerning EMF distance exposure. <https://www.capecodtimes.com/story/news/2024/05/29/covell-beach-signs-offshore-vineyard-wind-barnstable-emf-cape-cod/73792233007/> 8. In 2018, Gov. J. Carney and 9 other Governors sign a letter to the U.S. Department of Commerce and Dept of Interior stating seismic testing, incidental take of marine life, and offshore drilling is unacceptable and unnecessary threat to ecosystem and economy. And urges to deny any offshore drilling. (Ref: letter attached. US Wind drilling is exactly their stated concerns. Drilling 9ft under and through our protective sand dunes and rising to surface level at 3'Rs. March 2024, North side of Charles W.Cullen Bridge (IR inlet) the ocean breeched our dunes closing our main highway. These cables are unsafe at any depth to the unstable grounds Drilling 9 ft under Coastal highway (our emergency evacuation route) where sea level rises during storms and erodes this area. Drilling 6ft under wetlands and bay with current poor water quality, and miles of drilling through the protected coastal zone is unacceptable and an unnecessary threat. ❖❖❖ 9. Environment destruction a.) On July 15, 2024, Avangrids Vineyard Wind I project in Massachusetts had a turbine collapse. A 260ft turbine blade broke off and crashed into the ocean. Shattering into pieces. Fiberglass littered the ocean and coast for miles. Creating an environmental disaster to marine life, wildlife, and a public safety emergency. Due to Avangrid not reporting destruction immediately, mariners were in danger. One turbine blade shut down Massachusetts waters, and beaches were closed. Hazmats suits were worn for clean up. put lives at risk. Fed Gov halted the project. A few days later the second blade crashed into the ocean. Current, yes, Under investigation. (ref: <https://vineyardgazette.com/news/2024/07/15/vineyard-wind-turbine-damaged-over-weekend> (https://vineyardgazette.com/news/2024/07/15/vineyard-wind-turbine-damaged-over-weekend) b.) 2016- Orsted's 5 turbine project off Block Island, RI Experienced multiple issues. 2017- plastic sleeves were installed to cover portions of the cable. National Grid and Orsted blame subsurface bedrock, boulders, and shifting sand has made them prone to exposure and damage. 5/2019 - 2 sections of cables were exposed from shifting sand. Plus a blockage in conduit pipe resulting in cable replacement. \$60M was the final cost to ratepayers. National Grid \$30M and Orsted \$30M. Repair work was expected to be completed in 2021. 10/2021- still not completed. 10. Poor Water Quality DNREC has reported poor water quality for 4 years straight. Horizontal drilling will not improve this. I have not witnessed or read of any core samples of the sediments 6-8ft down in the clay, muck, and sand of our IR bay and coves. Many chemicals contaminates bind to bottom sediments, remaining there for years. Horizontal Drilling causing plumes will contaminate and bury the benthic species creating more of an unhealthy environment. 11. Uphold our laws: Delaware Coastal Zone Act 1971 lawmakers passed the Delaware Coastal Zone Act. For generations this has protected our State from this exact oil, gas, turbine industrialization. This permit request is in direct violation of Title 7 Conservation - Natural Resources, Chapter 70. Coastal Zone Act 7003: "heavy industry uses of any kind not in operation on June 28, 1971, are prohibited in the coastal zone and no permits may be issued therefor. In addition, offshore gas, liquid or solid bulk product transfer facilities which are not in operation on 1971, are prohibited in the coastal zone, and no permit may be issued" 12. Del. Net Zero goals Studies in the Netherlands, Ireland, Colorado, and Texas have all found that adding wind farms causes existing fossil fuel plants to produce more CO2. As the amount of turbine wind farms increases, the total CO2 released also increases, making emissions as high or even higher than they would have been with no wind farms. No study has contradicted this finding. The polyurethane conduit cables are the same in production and increasing cO2 levels. The entire production of turbine and cables do not meet Delaware net zero goals. We see a turbine, not the entire production. The three main components needed to build a turbine — concrete, steel, and fiberglass — all produce staggering amounts of CO2 in their manufacture, even before the 260-foot-long fiberglass blades of the turbine begin to rotate. BOEM In 2021, stated " the construction of multiple offshore wind project along the East coast would have negligible impacts on climate change during these activities, and an over all minor beneficial impact on Greenhouse gas omissions. Construction, implementation, operation, maintenance and eventual decommissioning activities would cause green house gas to increase through emission of CO2. No collective impact on global warming as a result of

offshore turbines.” 13. Construction months Living on the bay for 25 years and navigating these waters for 40+ yrs., we can attest to the strong N, NNE and West winds this time of year. Loosing 2 docks within 20 years from the wind driving the water. shifting the sand and forever changing the channels. As DNREC knows, the strong currents have created 2 lg. sandbars over the last 15 years. Again, as Block Island project discovered currents and shifting sands exposed cables from waves. 14. Unstable ground 3/2024 -we witnessed the ocean breach the dunes at Charles W. Cullen Bridge (IR bridge). The second bridge constructed within a year, due to foundation cracks and unstable land. The cables coming onshore just south of this vulnerable area and under Coastal Highway has the potential to cause significant damage to this known high wind, prone to flood area. And put our district and evacuation route in great danger. AND ocean breech on AUG 19, 2024 - There is too much at risk for our coastal zone. These direct environmental impacts outweigh the turbine cable permits. And does not mean every project that calls itself renewable and green gets a pass. Turbine Co2 reduction is zero — much too little to justify the environmental impact. This is the MOST egregious case of environmental destruction in human history. Opposed-along with 14K+ petitioned constituents, 2nd homeowners, and vacationers alike. Opposed, Mr. and Mrs. Caggiano Constituents of Ocean View, Del.