

Public Hearing Comments

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

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Organization:

Comments:

I am writing to express my concerns about the proposed onshore windmill cables and their potential impact on our local environment, particularly on horseshoe crabs, a keystone species, and on the bay where many residents fish and engage in recreational activities. Horseshoe crabs play a crucial role in our coastal ecosystem. As a keystone species, they are vital to the survival of other wildlife, including migratory shorebirds that depend on their eggs for nourishment during long migrations. Any disruption to their natural habitat could have cascading effects on the entire ecosystem. Electromagnetic fields (EMF) generated by windmill cables can disrupt the natural behavior and migration patterns of marine species, including horseshoe crabs. The EIS report stated "the effects of EMF and heat on most invertebrate taxa (e.g., embryonic and juvenile crustaceans and mollusks, horseshoe crabs) remain understudied" (Gill and Desender 2020). This lack of understanding raises significant concerns about the potential long-term impacts on these crucial species. Moreover, the Environmental Impact Statement (EIS) appears to contradict itself regarding the risks posed by EMF. On page 3-76, it states, "Due to the importance of the horseshoe crabs and shellfish to the Mid-Atlantic, US Wind has conducted a site-specific study of potential EMF impacts. The modeling study found that the electric field produced would be below the reported detection thresholds for electrosensitive marine organisms" (Exponent 2023). This claim seems at odds with the acknowledgment on page 3-52 that the effects of EMF on these species are understudied. Such contradictions undermine confidence in the assessment's conclusions and suggest that further research is needed before proceeding with the project. Could the referenced study showing that electrosensitive thresholds specific to horseshoe crabs are not exceeded be made available to the public? Additionally, on page 3-170 of the EIS, it is noted that "When operating at peak loading, the maximum level of the magnetic field produced from the Offshore Export Cable Route cables both offshore and through Indian River Bay was calculated as 148 mG (14.8 μ T) at the seabed, and quickly decreased to 12 mG (1.2 μ T) just 3.3 feet (1 meter) above the seafloor" (Exponent 2023). While the decrease in magnetic field strength with distance from the cables is acknowledged, the potential impact of even low-level EMF exposure on sensitive species, particularly horseshoe crabs, remains a concern given the lack of comprehensive research in this area. Furthermore, there are serious concerns regarding the safety of prolonged EMF exposure for humans, particularly in recreational areas. The Swedish Ministry of Energy has issued a warning that kindergartens, playgrounds, and schools should not be located near power lines and that children shouldn't be exposed to alternating magnetic fields greater than 0.3 μ T (3 mG) for prolonged periods every day. This guideline raises questions about the safety of installing high-EMF-producing cables near areas where children and families frequently engage in outdoor activities. While I support renewable energy initiatives, I believe it is crucial to consider the environmental and social impacts of such projects. I urge the decision-makers to explore alternative solutions that do not compromise the well-being of our keystone species or the integrity of our bay. Options such as rerouting the cables away from critical habitats or investing in advanced shielding technologies to mitigate EMF exposure should be thoroughly evaluated. Thank you for considering these concerns.

