


## Public Hearing Comments

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To:HearingComments, DNREC (MailBox Resources) <DNRECHearingComments@delaware.gov>;  
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 1 attachments (3 MB)

randacoustics\_piledrivingnoisesurvey.pdf;

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

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Organization:

Comments:

To Whom It May Concern, In reference to the US Wind Project Docket #2024-P-MULTI-0007, I wish to submit the following statement voicing my strong opposition to the project and my request that you deny all permit requests from US Wind for its EMF cable landing at Delaware Seashore State Park's 3R's Beach, EMF cable routing through the wetlands and the Indian River, and it's interconnection to the proposed substation next to the Indian River Power Plant. The adverse effects cited in the Environmental Impact Survey for this project, the industrialization of our coastal waters, and of our shores is of great concern. I have been a visitor to the area since the early 1980's, and have been a homeowner in Sussex County since 2018, and a full time resident since 2021. I am also the Club Director for the Carefree Boat Club of Ocean City. My livelihood is dependent upon tourism and the ability for boaters and fisherman to enjoy our waters. Putting wind farms off our coast will impede boaters, their ability to navigate, and also will impede rescue efforts by the Coast Guard, when boater assistance in these areas is needed. Wind farm development threatens to impact tourism in our area. I am also a stranding response team volunteer with MERR Institute, a non-profit who provides Marine Education, Research, and Rehabilitation for marine mammals and sea turtles in Delaware and I have witnessed first-hand the increased marine life that has been washing up on our shores since offshore wind farm development surveys have started in the area. Incidental Take Requests approved by NOAA and BOEM for US Wind's MarWin and Momentum Wind and other projects, are out of line and in violation of the Endangered Species Act. The Incidental Take Request for US Wind's offshore lease area project OCS-A 0490 has authorized the Level A (killing) harassment of six Fin Whales, six Humpback whales, nine Common Minke Whale, three Sei Whales, six Harbor Porpoises, and the level B harassment (disruption of food sources, migratory patterns) to the endangered North Atlantic Right Whale, thirty one Fin whales, twenty six Humpback whales, three Sei Whales, over five thousand common bottlenose dolphins, one hundred sixty two Atlantic Spotted Dolphins, four hundred dour short-beaked common dolphin, 52 Long-finned and short finned pilot whales, seventy eight Risso's dolphin, thirty four Harbor porpoises, and three hundred forty two Harbor and Gray seals. The Sei Whale and the North Atlantic Right Whale are both protected under the Marine Mammal Protection Act and the North Atlantic Right Whale is critically endangered with less than four hundred remaining. Allowing pile driving to occur in migratory areas of the North Atlantic Right Whale, will impair them and contribute and ultimately lead to their extinction. While NOAA cites a still unexplained "Unusual Mortality Event" as the cause of an increase in whale deaths along the Atlantic, those who have researched the project can cite a correlation in the timing in 2016, when the wind farm environmental impact studies started. Acoustic disturbances with surveying and construction disorient marine mammals and can often drive them away from the lease areas and into shipping channels, resulting in an increase ship strikes. An acoustic survey conducted (see attachment) by

renowned audiologist Robert Rand indicate the pile driving audio levels from wind farm developers off the New Jersey coast, are well outside what has approved and documented and will certainly lead to impairment if not injury. A correlation between wind farm activities, increases in boat traffic, and whale deaths in the Atlantic is documented in Michael Shellenberger's *Thrown To The Wind*. Sonar surveying, sediment coring, dredging, and trawling all disrupt the sea floor and the marine life within a large area and activities such as pile driving, have auditory effects on marine life spanning for many kilometers from the source. Trawling off of our coast during the wind farm surveying resulted in hundreds, possibly thousands of horseshoe crabs being crushed and washing ashore at Delaware Seashore State Park that were conducted. I do not agree with BOEM and NOAA Fisheries in their approval of US Wind's Incidental take request for this project that granted permission for the wind farm developers to kill and harm endangered marine life off our coast. My greatest concerns of this project are the impact to tourism, our marine life, and our ecologically sensitive areas such as Delaware Seashore State Park, the Carl Shuster, Jr. Horseshoe Crab Reserve, and to the ecosystems in and on the Indian River Bay, which the EMF cable will run through. The Carl Shuster Horseshoe Crab Reserve is deemed as a Marine Protected Area, which is defined as a region designated and managed for the long-term conservation of marine resources, ecosystems services, or cultural heritage. Horseshoe crabs are a limited resource that allow us medical testing for the presence of endotoxins and bacterial substances. How is this proposal even being entertained as it will impact and affect the Carl Shuster, Jr. Horseshoe Crab Reserve? The Electro Magnetic Frequency cable is slated to run right off the shores of James Farm Preserve and Holts Landing State Park. These are also ecologically sensitive areas that warrant protection. The Indian River is notorious for shifting sand and the concern is real that these EMF cables may not stay buried, as has been reported with the failed Block Island Windfarm off Rhode Island. EMF emitting cables have been studied and have caused disorientation in invertebrates. Construction in this area will also impact the recreational and commercial fishing industries and I have concern that our waters will never recover. Ocean City may not be able to boast being the "White Marlin Capital of the World" with our fisheries being so greatly impacted by this project. Another great environmental concern is the unreliability existing wind farms are already encountering, such what recently occurred with Vineyard Wind's project. Turbine blades broke off the monopile, polluted the ocean with fragments of fiberglass, and shut down beaches off Nantucket Bay. The wind farm developer there failed to try to rectify the issue days and weeks after learning of its failure. These wind farm turbines have only been tested for up to a category three hurricane, and when a stronger hurricane passes over the lease area, one would expect that since turbine manufacturers have already been experiencing failures in lighter winds, that the structures will not hold up well. As a resident, I also have concerns about who will pay for decommissioning costs and replacement parts, as these structures age. The proposed project and the numerous potential issues far outweigh a possible \$30 annual savings on an electric bill. US Wind's Environmental Impact Study offered no oil spill response plan for the public to review and Freedom of Information Act requests to BOEM to obtain more information, provided no solutions with only fully redacted documents being returned. These monopiles hold hundreds of gallons of oil and lubricant to operate and the general public and residents have been offered no oil spill response plan to review. The Delaware Center for the Inland Bays and the Maryland Coastal Bays Program, non-Profit organizations in our area, have accepted money from US Wind and both of their former Executive Directors now work for wind farm developers. The complacency of the Association of Coastal Towns, their willingness to hide the process from the residents, and their failure to disclose information through Freedom of Information Act requests, is extremely troublesome. Since most of our environmental steward organizations have been bought off by wind farm developers, it falls on the residents of Sussex and Wicomico Counties and DNREC to stop the destruction of our "Quiet Resorts", our beaches, marine ecosystems, tourism, our livelihoods, recreational and commercial fishing, and ultimately the ocean and our future from offshore wind farm development. Please deny all of US Wind's permits for offshore wind development, show that you are the environmental steward we need, and listen to the residents of Sussex County. Respectfully Submitted, Jennifer Pawloski Millville, Delaware