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**Subject:** Public Hearing Comments

**Date:** Tuesday, September 3, 2024 9:37:41 AM

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

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Organization: I am a Homeowner in Tower Shores Beach Association

## Comments:

As a homeowner at Tower Shores Beach Association, I urge the Delaware Department of Natural Resources and Environmental Control (DNREC) to reject all permits requested by US Wind for its Maryland Wind Project. These permits are critical for allowing Offshore Export Cables to come ashore in Delaware's state park and include the Subaqueous Lands Permit/Lease, Wetlands Permit, Water Quality Certification for dredging in the Indian River, and the Beach Preservation Coastal Construction Permit. US Wind plans to lay up to four Offshore Export Cables northwest from its lease area in Maryland, bringing them ashore in Delaware. These cables, buried only 3 to 7 feet below the seafloor, would cross directly offshore from our private beach using jet plow embedment. After reaching land on the Delaware Shoreline, the cables will be horizontally directional drilled (HDD) from the ocean side to the bayside of Indian River Bay. More submarine cables will be installed from one mile south of the Indian River Bay Inlet to Burton Island, where they will again come ashore, using jet plowing. This project puts our community's private property and residents at direct risk. Our 226 homes, primarily wooden structures, are densely located within a 4-block radius on the ocean side of Route 1. The idea of high-voltage power cables carrying 1,100 megawatts of electricity so close to our homes is alarming, especially considering that US Wind has no experience building offshore wind projects. This makes our community an untested site for this experimental project. It is baffling that government officials would even consider such a request, especially when Maryland has miles of undeveloped seashore where the cables could be brought ashore. Yet, due to a 2013 Maryland law, House Bill 226, signed by the Governor, the Maryland Public Service Commission is barred from approving submerged energy lines within Assateague National Seashore Park. If these cables aren't allowed in protected land in Maryland, why would Delaware's state park be any different? This is a Maryland project, and the environmental damage should remain in Maryland. Even Maryland's local governments in Ocean City and Fenwick Island have rejected the cables and are preparing to litigate against the US Wind project. Now, with Maryland blocking the lines, we are being told that 3 Rs road is the only remaining cost-effective option for bringing the cables ashore due to its proximity to the Indian River Power Plant substation. But why is cost the top priority for DNREC? What about the safety of hundreds of homeowners and their families? What about the potential costs our community will bear due to US Wind's actions? Below are key deficiencies in the US Wind plan, highlighting why their requests for permits should be denied: Public Safety Concerns \*US Wind's plan fails to address public safety emergencies. Our community lies outside the jurisdiction of Bethany Beach emergency services, and Sussex County and Delaware have not identified these high-voltage cables in their Threat Hazard Identification Risk Assessment. What happens if disaster strikes? This is not hypothetical. \*Offshore wind incidents have occurred. For instance, on July 15, Vineyard Wind reported a blade breakage off Massachusetts, which led to beach closures. In 2021, National Grid had to suspend work

on Block Island when cables, despite being buried six feet deep, were exposed on a recreational beach. US Wind plans to bury their cables only 3 to 7 feet. DNREC cannot be certain this won't pose harm to humans or marine life swimming near our beach. \*The Bureau of Ocean Energy Management's Final Environmental Impact Statement notes that the cables may require additional protection, such as mattresses or rock placement. What risks do these pose to humans, marine life, or the environment? \*Offshore wind turbines and substations contain over 508,000 gallons of oil. A severe hurricane could cause a catastrophic spill directly impacting our private beach. US Wind's oil response plan is woefully inadequate. \*US Wind plans to self-inspect the cables periodically. Given the scale of this project, a state or federal agency must be responsible for regular inspections to ensure public safety. Environmental Concerns \*US Wind has not studied how tidal erosion could affect adjacent beaches, potentially increasing storm damage risks for our community. This could lead to costly beach replenishment and home repairs, which would fall entirely on our homeowners. \*The impact of jet plowing has not been thoroughly studied. It could render the waters off our beach unsafe for swimming, even during the fall and spring shoulder seasons, affecting tourism and rental income for homeowners. \*There is a serious risk that the plowing process could disrupt coal ash deposits in the bay. This could release harmful toxins into the water, posing a significant threat to marine life and potentially contaminating the water we swim in. The long-term environmental impact of coal ash disruption has not been adequately addressed by US Wind. \*US Wind admits it has not yet completed crucial studies on endangered marine species, such as the right whale and horseshoe crabs. Community members have already observed survey vessels disturbing marine life, including dolphins. How much more disruption will occur during cable and turbine installation? \*Offshore wind projects elsewhere, like in Virginia Beach, have resulted in noise pollution and constant vibrations during construction. Will US Wind limit work to daylight hours, or will we suffer 24/7 noise and vibrations? Will homeowners be compensated for potential foundation damage to their homes? Impact on Tourism and the Local Economy \*Our area is a vibrant tourist destination, known for its pristine beaches and family-friendly atmosphere. The installation of wind turbines and the associated industrial activity pose a grave threat to the very foundation of our local economy. Tourists come here to enjoy the natural beauty and tranquility of our beaches, not to be confronted by massive industrial structures and the constant hum of construction. \*The presence of wind turbines offshore, combined with the potential environmental degradation from the cable installation process, will deter visitors. The sight of industrial equipment on our beaches, along with the possibility of contaminated waters and increased noise pollution, will drive tourists away. This will have a devastating effect on our thriving local businesses that rely on seasonal tourism. \*As tourists stop coming, property values in our area will plummet. Homeowners who have invested in this community will see their property values decrease as the area becomes less desirable due to the intrusive presence of wind turbines and the industrialization of our beach environment. The long-term financial damage to our community cannot be overstated. This project threatens to transform our peaceful beach community into an industrial zone, jeopardizing not only the natural environment but also the economic stability and future prosperity of our town. For these reasons, we strongly urge DNREC to deny the permits requested by US Wind in their current form. This project poses significant threats to our community's safety, our natural environment, and our homes. Thank you for your consideration.