

Public Comments of
Advocates for Safer Shores & Communities
July 8, 2024

Executive Summary

This is a critical issue about public safety, preparedness, and the protection of life and property. And until the process is complete, we must hit the pause button until EVERYONE from state, federal governments, and private industry have done their due diligence.

We are concerned about the lack of any emergency planning, including no funding for training, staffing or equipment for local first responders in Bethany Beach and Sussex County. These local agencies will be the first to respond to any fire or pollution or other event relating to the high voltage transmission line, the windmills, a release of the hundreds of thousands of gallons of diesel oil stored just off our public beaches, incidents during construction or dredging, maritime incidents involving ocean-going ships in the shipping channel immediately adjacent to the wind turbines that might hit an 80-story windmill, and the RF risk and possible electrocution from the uncovering of the 6,000 mw lines at 3Rs beach or in the Indian River Bay or by a boat hooking the line with its anchor.

These dangers to lives and property cannot be dismissed as theoretical. Undersea buried cables from an offshore wind project in Block Island, RI, became uncovered on a tourist beach and remained exposed for up to two years before being reburied. In March of this year, an electrical event caused a large cargo ship to lose control and crash into Key Bridge in Baltimore, killing six and closing the port. Wildfires, in each case sparked by electric transmission lines, destroyed the towns of Lahaina, in Maui, and Paradise, California, in each case killing over 100 people in their cars and homes as they tried to evacuate or shelter amid the chaos. The death toll in both the Maui and Paradise fires was amplified by local government officials' lack of planning and poor prior communication with the public.

Yet, as revealed in this short white paper, **no Delaware state or local governmental entity has identified the proposed wind turbine engines or the high voltage transmission line 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 to**

the local public safety agencies who will be the first responders to virtually every emergency. How can you approve such a project without knowing all the risks?

This is a public safety issue that affects ALL residents of our Delaware beach communities. If we do not plan and prepare, we are courting the unthinkable.

We call upon DNREC and the State of Delaware to act with reason, to do their own due diligence, and to not approve this complex energy project until they and the affected local communities have completed the required Threat Hazard Identification Risk Assessment and the developer has committed the funding necessary and adequate for the equipping, staffing, and training of first responders throughout Bethany and Sussex County.

Context

US Wind, Inc., proposes to develop a novel offshore wind energy project with power lines from the project to come ashore at 3Rs Beach in Delaware Seashore State Park and interconnect into a proposed substation built adjacent to the Indian River Power Plant.

This wind energy system design proposes building one hundred and fourteen wind turbine towers – each 80-85 stories tall - twelve miles offshore from Delaware/Maryland coastal communities. The developer has increased the height from the original estimate of 300-400' to 600' to 853' to 938', and now to whatever is the largest turbine available (Kitty Hawk has 1,024'). The change in the public safety impact of the significant increase in the size of these towers is unknown because no Threat Hazard Identification Risk Assessment has been conducted involving these towers.

Mechanical collection of wind occurs by large turbines, converted to electric current, and transmitted through high voltage lines capable of carrying between 2,000 and 6,000 megawatts of power into 3R's Beach under Route 1 and under a shallow Bay popular with recreational boaters and swimmers.

Problem Space

Bethany Beach is exposed to a variety of hazards, both natural and man-made. Hurricanes, severe coastal storms, flooding, fires, power outages, chemical spills, and even acts of terrorism

are risk considerations. However, the town has not taken action to recognize that a novel offshore wind project is a concern or risk.

The Town of Bethany Beach, Sussex County Delaware, and the State of Delaware Emergency Management agencies are committed to Emergency Preparedness. The problem is no agency (local, county, state) identified this novel high energy project as a threat in their planning process.

Initial emergency planning documents should contain a Threat Hazard Incident Risk Analysis (THIRA). This section of the document identifies local risks, projected frequency, and consequences. That information directs the allocation of resources to develop prevention, preparation, mitigation, response, and recovery actions. None of the documents reviewed contain this information focused on the offshore wind project and connection at 3R's beach.

Document	THIRA	Action
Town of Bethany Beach emergency plan wind energy project	None	No action directed
Sussex County emergency management wind energy project	Yes, completed without any reference to wind energy systems,	No action directed
State of Delaware Emergency Management wind energy project	Yes, completed without any reference to wind energy systems,	No action directed

Here is the Federal Emergency Management Agency document that provides the pathway, <https://www.fema.gov/sites/default/files/2020-07/threat-hazard-identification-risk-assessment-stakeholder-preparedness-review-guide.pdf>

Consequences

The issue cannot be dismissed as theoretical: Undersea buried cables from an offshore wind project in Block Island, RI, became uncovered on a tourist beach and remained exposed for up to two years before being reburied. Recent events such as the collapse of the Key Bridge in Baltimore when struck by the ship Dali (electric outage on cargo ship causes ship to strike bridge, shutting port, killing 4 people), the wildfire in Lahaina, Hawaii (killed 102 people), and wildfire in Paradise, California (destroyed community) further demonstrate the need to plan. Following the standard planning methods in this very unpredictable condition (Novel offshore wind energy collection, transmission, and processing to 3R's beach) is necessary. "Think the unthinkable" is a good theme to rationally lay out this problem and develop a set of scalable solutions.

Requested relief.

- Establish clear regular communication sessions with local, county, and state officials, and the public, to understand the situation.
- Establish clear regular collaboration sessions with local, county, and state officials to understand the situation and identify key resources and functions for normal, routine, and emergency situations.
- Establish clear regular coordination sessions with local, county, and state officials to understand the situation and identify key resources and functions for normal, routine, and emergency situations and practice these responses. Use the Homeland Security Exercise and Evaluation Guide as the model (<https://www.fema.gov/sites/default/files/2020-04/Homeland-Security-Exercise-and-Evaluation-Program-Doctrine-2020-Revision-2-2-25.pdf>).
- Include the wind energy project as a component of the Threat Hazard Incident Incident Analysis (THIRA) to all levels (local, county, state) emergency management plan.
- Place the offshore wind energy project as a component of local, state, and federal planning documents.
- **Commit adequate financial resources to build and sustain local regular training for the first responder community and local agencies on novel offshore wind energy projects!**

Closing

The US Wind project poses considerable risks to 3R's Beach and the Bethany Beach Community. A solid approach is to identify threats, ensure that the developer has committed to funding the resources required by local and state first responders, and document all actions into a standard plan before approving the project.