# US Wind Construction and Operations Plan Scoping Summary Report

## July 2022

U.S. Department of the Interior
Bureau of Ocean Energy Management
Office of Renewable Energy Programs

# Table of Contents



# List of Appendices

# List of Tables

# List of Abbreviations and Acronyms

| Abbreviation | Definition |
|---|---|
| ADLS | Aircraft Detection Lighting Systems |
| AIS | automatic identification system |
| BA | Biological Assessment |
| BIA | Biologically Important Area |
| BOEM | Bureau of Ocean Energy Management |
| CEQ | Council on Environmental Quality |
| CFR | Code of Federal Regulations |
| COP | Construction and Operations Plan |
| CRM | Collision Risk Modeling |
| CZM | Coastal Zone Management |
| DEQ-OEIR | Department of Environmental Quality, through its Office of Environmental Impact Review |
| EFH | Essential Fish Habitat |
| EIS | Environmental Impact Statement |
| EMF | electromagnetic fields |
| EPA | U.S. Environmental Protection Agency |
| ESA | Endangered Species Act |
| HAP | hazardous air pollutants |
| HMS | Highly migratory species |
| HVDC | high voltage direct current |
| ID | identification |
| ITA | Incidental Take Authorization |
| IUCN | International Union for Conservation of Nature |
| MAFMC | Mid-Atlantic Fishery Management Council |
| MBTA | Migratory Bird Treaty Act |
| MMPA | Marine Mammal Protection Act |
| MPG | Maritime Planning Guidelines |
| MW | megawatt |
| NARW | North Atlantic right whale |
| NEFMC | New England Fishery Management Council |
| NEPA | National Environmental Policy Act |
| NHL | National Historic Landmark |
| NHPA | National Historic Preservation Act |
| NMFS | National Marine Fisheries Service |
| NOAA | National Oceanic and Atmospheric Administration |
| NPS | National Park Service |
| NOI | Notice of Intent |
| PAM | passive acoustic monitoring |
| PDF | portable document format |

| | |
|---|---|
| USFWS | U.S. Fish and Wildlife Service |
| VMS | vessel monitoring system |
| VOC | volatile organic compound |
| WEA | Wind Energy Area |
| WTG | wind turbine generator |

# 1 Scoping Summary for the US Wind Environmental Impact Statement

## 1.1 Introduction

The Council on Environmental Quality (CEQ) regulations for implementing the National Environmental Policy Act (NEPA) under Title 40 of the Code of Federal Regulations (CFR) Section 1501.7(a) require agencies such as the Bureau of Ocean Energy Management (BOEM) to perform certain actions as part of the scoping process, including:

- Determining the scope and the significant issues to be analyzed in depth in the Environmental Impact Statement (EIS); and
- Identifying and eliminating from detailed study the issues that are not significant.

This Scoping Summary Report, in combination with the Draft EIS, is intended to satisfy BOEM's obligations under 40 CFR 1501.7(a).

On May 27, 2022, US Wind submitted an updated Construction and Operations Plan (COP) to BOEM seeking approval to construct and operate up to 98 wind turbine generators (WTGs) with a capacity to generate 1,100 megawatts (herein referred to as the proposed Project or Proposed Action) offshore of Maryland in federal waters. On June 8, 2022, BOEM issued a Notice of Intent (NOI) to prepare an EIS consistent with NEPA regulations (42 United States Code § 4321 et seq.) to assess the potential impacts of the Proposed Action and alternatives (83 Federal Register 13777).

The NOI commenced a public scoping process, including three virtual meetings for identifying issues and potential alternatives for consideration in the EIS. The formal scoping period was from June 8 through July 8, 2022. During this timeframe, federal agencies, state and local governments, and the public had the opportunity to help BOEM identify potential significant resources and issues, impact-producing factors, reasonable alternatives (e.g., size, geographic, seasonal, or other restrictions on construction and siting of facilities and activities), and potential mitigation measures to analyze in the EIS, as well as provide additional information. BOEM also used the NEPA scoping process to initiate the Section 106 consultation process under the National Historic Preservation Act (NHPA) (54 United States Code § 300101 et seq.), as permitted by 36 CFR § 800.2(d)(3), which requires federal agencies to assess the effects of projects on historic properties. Additionally, BOEM informed its Section 106 consultation by seeking public comment and input through the NOI regarding the identification of historic properties or potential effects on historic properties from activities associated with approval of the US Wind COP. The NOI requested comments from the public in written form, delivered by hand or by mail, or through the regulations.gov web portal.

This Scoping Summary Report outlines the objectives, methodology, and content of the information provided by interested parties during the scoping period.

## 1.2 Objective

This report reviews and catalogues the information and materials provided to BOEM during the scoping period for the proposed Project. The goal of the exercise was to identify substantive comments for consideration in the development of the EIS and categorize them based on the applicable resource areas or NEPA topics. Section 1.3 describes the methodology used to identify and categorize comments. This categorization scheme allowed subject matter experts to review comments directly related to their areas of

expertise and allowed BOEM to generate statistics based on the resource areas or NEPA topics addressed in each of the comments. In addition, the process demonstrates consideration of the materials received while simultaneously contributing to the development of the EIS.

## 1.3 Methodology

### 1.3.1 Terminology

The following terminology is used throughout this Scoping Summary Report:

- **Submission**: The entire content submitted by a single person or group at a single time. For example, a 10-page letter from a citizen, an email with a portable document format (PDF) attachment, or a transcript of an oral comment given at a public scoping meeting was considered to be a submission.
- **Comment**: A specific statement within a submission that expresses a sender's specific point of view, concern, question, or suggestion. One submission may contain many comments.

### 1.3.2 Comment Submittal

BOEM received comment submissions during the scoping process via the following mechanisms:

- Electronic submissions received via Regulations.gov on docket number BOEM-2022-0025;
- Electronic submissions received via email to a BOEM representative; and
- Comments submitted verbally at each of the three public scoping meetings.

BOEM did not receive any hard-copy comment submissions by hand or by mail. While the NOI did not include email as a method for submitting a comment, any submissions received via email that were clearly identified as relating to the Project were considered a valid comment submission.

Three virtual public scoping meetings were held on the following dates as outlined in Table 1-1. The number of submissions received via each submission method is provided in Table 2-1.

**Table 1-1 Virtual public scoping meetings**

| Public Scoping Meeting Date | Time |
|---|---|
| June 21, 2022 | 5:00 p.m. EST |
| June 23, 2022 | 5:00 p.m. EST |
| June 27, 2022 | 1:00 p.m. EST |

### 1.3.3 Comment Processing

#### 1.3.3.1 Compilation of Submissions

Submissions were provided via Regulations.gov, email, or verbally at the public meetings (as shown in Table 2-1). All submissions were downloaded, processed, and imported into the Comment Matrix and recorded information about each submission, including the submitter's name, submission date, submission method, and whether the submitter was an individual, representative of an organization, or from a government entity or agency.

As submissions were entered into the Comment Matrix, they were assigned a submission identification (ID). This ID begins with the Project Docket number, e.g., "BOEM-2022-0025," followed by the submission method, followed by a submission ID number. For the submission method, "DRAFT" indicates the submission was received via Regulations.gov; "EMAIL" indicates the submission was received via email; and "TRANS" indicates the submission was received via a transcript from a public scoping meeting. These submission IDs can be found in Appendix A, *Comment Matrix by NEPA Resource Topic*.

#### 1.3.3.2 Identification of Comments

All submissions and oral testimonies were read to identify individual comments (as defined in Section 1.3.1). A hierarchical outline was developed to include key issues addressed by the commenters or identified in the NOI. This issue outline was used to code each individual comment within the Comment Matrix to a specific resource or NEPA topic. Each comment coded received a unique comment Submission ID number. For example, the first comment identified in submission BOEM-2022-0025-DRAFT-0001 was identified as comment BOEM-2022-0025-DRAFT-0001-208. When a comment pertained to more than one resource or NEPA topic, it was not coded to multiple topics but instead coded to the most applicable topic. The resource categories are provided in Table 2-2.

Appendix A, *Comment Matrix by NEPA Resource Topic*, provides a listing of all the submissions received as well as all the individual comments that were extracted from each submission, organized by NEPA resource topic. The individual comments provided in Appendix A include verbatim comment excerpts as written by the commenters. The purpose of presenting this material in its verbatim form is to preserve the exact words of the commenter as they relate to each issue.

# 2 Scoping Submission and Comment Summary

## 2.1 Submissions

BOEM received 277 submissions from the public, agencies, and other interested groups and stakeholders. Table 2-1 shows the number of submissions received via each submission method. The total number of unique submissions was 264, since some commenters submitted the same letter via multiple methods.

**Table 2-1 Distribution of Submissions by Method**

| Submission Type | Number of Submissions Received |
|---|---|
| Regulations.gov submissions | 212 |
| Email to BOEM representative | 4 |
| Verbal submission at a public meeting | 61 |
| Total | 277 |

The totals above included the following submissions by federal, state, and local government entities:

- Five submissions from federal agencies: 1) U.S. Coast Guard; 2) National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS); 3) U.S. Environmental Protection Agency (EPA); 4) National Park Service (NPS); and 5) Mid-Atlantic Fishery Management Council (MAFMC) and New England Fishery Management Council (NEFMC);
- Seven submissions from six state agencies or representatives: 1) two from Maryland State Senator, District 38 (submitted oral and written comment); 2) Maryland State Senator,

District 15; 3) Maryland Environmental Trust; 4) Maryland State Legislator; 5) Delaware Department of Natural Resources and Environmental Control; and 6) Virginia Department of Environmental Quality;
- Eight submissions from local governments: two from the Town of Ocean City, two from the Town of Fenwick Island; Baltimore County; Ocean Pines Chamber of Commerce; PFC Black Chamber of Commerce; Cape May County, New Jersey.

In addition to the federal, state, and local government entities identified above, 41 submissions came from non-governmental organizations, which includes industry associations, and the remaining 201 submissions were provided by individuals.

## 2.2 Comments

A total of 929 unique comments were identified. Table 2-2 shows the distribution of comments by resource and NEPA topic. Section 2.3 defines the resource areas to which comments were assigned and summarizes the comments by each topic. The most commonly addressed resource topics included Alternatives - Project relocation; NEPA/Public Involvement Process; Recreation and Tourism; Scenic and Visual Resources; and Noise.

**Table 2-2 Distribution of Comments by Resource or NEPA Topic**

| Resource | Number of Comments |
|---|---|
| Air Quality | 10 |
| Alternatives - Cables and landfalls | 42 |
| Alternatives - Other comments on alternatives | 16 |
| Alternatives - Project relocation | 94 |
| Alternatives - Wind turbines | 17 |
| Bats | 2 |
| Benthic Resources | 18 |
| Birds | 22 |
| Climate Change | 34 |
| Coastal Zone Consistency | 1 |
| Commercial Fisheries and For-Hire Recreational Fishing | 32 |
| Cultural, Historical, and Archaeological Resources | 7 |
| Demographics, Employment, and Economics | 36 |
| Electromagnetic Fields (EMF) | 46 |
| Environmental Justice | 18 |
| Finfish, Invertebrates, and Essential Fish Habitat | 13 |
| General Support or Opposition | 106 |
| General Wildlife | 51 |
| Land Use and Coastal Infrastructure | 0 |
| Marine Mammals | 9 |
| Materials and Waste Management | 11 |
| Mitigation and Monitoring | 20 |
| Navigation and Vessel Traffic | 12 |
| NEPA/Public Involvement Process | 75 |
| Noise | 55 |
| Other | 11 |
| Planned Activities Scenario/Cumulative Impacts | 12 |

| Resource | Number of Comments |
|---|---|
| Proposed Action/Project Design Envelope | 19 |
| Purpose and Need | 5 |
| Recreation and Tourism | 66 |
| Scenic and Visual Resources | 57 |
| Sea Turtles | 2 |
| Water Quality | 2 |
| Wetlands and Waters of the U.S. | 8 |
| Total | 929 |

## 2.3 Definition of Resource Areas and Common NEPA Topics Raised

The following sections define each of the resource areas or NEPA topics that the comments were categorized under and summarizes the comments by each of the resource areas or topics listed. Comments have been summarized below, as appropriate, particularly for concerns that were raised by several commenters. Appendix A presents the individual comments that were extracted from each of the submissions, organized by resource area or NEPA topic.

### 2.3.1 Air Quality

Air quality comments included evaluating emissions from proposed Project construction, operations, maintenance, and decommissioning. Comments specific to climate change are described in Section 2.3.9, *Climate Change*. Topics raised in this category included the following:

- The EIS should consider the carbon footprint of the entire turbine production process including manufacturing, transportation, installation, and decommissioning.
- The EIS should clearly present and quantify the emissions created and averted by the Project over the life of the Project. This assessment should account for the current energy usage through natural gas, coal, solar, and onshore wind.
- The Project will have a positive benefit to human health, by the reduction in pollution.
- The proposed Project will reduce greenhouse gas emissions and promote improved air quality.
- It should not be stated that pollutants are negligible or de minimis until a more refined Potential to Emit based on the project design is developed. The EIS should also avoid using absolute statements such as “the Project will be powered by wind and will produce no emissions during normal operations” (COP Volume II, page 71). Various pollutants may be emitted during normal operations such as Project vessel emissions during maintenance activities, emergency generators on offshore substation platforms, etc. The EIS should clarify emissions associated with the operation phase.
- While US Wind has included NOx potential emissions within the project potential emissions estimates, it has not included VOCs. The EIS should calculate volatile organic compound (VOC) emissions for both construction and operation phases of the project to determine whether the project will be a major source for VOCs. Further, it is recommended that US Wind complete an air emission analysis for all criteria pollutants, their precursors, and total Hazardous Air Pollutants (HAPs) emitted by the project. EPA recommends US Wind add emission estimates for carbon monoxide, lead, particulate matter (PM10), and HAPs to Appendix II’s air emissions analysis, in addition to VOCs.

### 2.3.2 Alternatives

Alternative comments included suggesting, questioning, or providing opinion about alternatives to the proposed Project. Additional comments related to alternatives and Project design are included in Section 2.3.27, *Proposed Action/Project Design Envelope*. Topics raised in this category included the following:

- The EIS should consider and evaluate the full range of reasonable alternatives to the Proposed Action, including those that would minimize impacts to the environment.
- The EIS should consider Alternatives including the following concepts:
  - Vessel traffic associated with the Wind Energy Area (WEA);
  - Monitoring;
  - Transparency and reporting;
  - Areas to be avoided in siting;
  - Right whale important areas;
  - Essential fish habitat,
  - Habitat areas of particular concern and deep-sea coral areas;
  - Site characterization;
  - Construction;
  - Gravity-based foundations;
  - Pile driving;
  - Clearance zones for all pile driving, including vibratory;
  - Shutdown requirements;
  - Noise reduction; and
  - Decommissioning.
- The EIS should analyze the Project components separately (wind farm area, offshore export cable routes, and inshore/landside export cable routes) and each element of the proposed Project should have multiple alternatives that could be "mixed and matched."
- The EIS should evaluate the most appropriate location/routing for each Project component to minimize environmental impacts and avoid sensitive/complex habitats.
- US Wind should consider reducing the number of turbines and substations, limiting the height of the turbines; moving the turbines farther offshore; using the shortest offshore cable corridor possible; maximizing cable burial depths; seasonal restrictions on construction activities; and excluding turbine, substation, and cable locations with the greatest overlap with fishing activity and sensitive habitat to reduce the associated impacts, with particular relevance to visual impacts.
- The proposed Project should consider newer technologies.
- The No Action Alternative must be considered and analyzed in the EIS. Additionally, the effects of the No Action alternative should not include the effects of reasonably foreseeable future lease build outs - which are better suited for consideration in the cumulative impacts analysis.

#### 2.3.2.1 Wind Turbines

- Alternatives for turbine layout and spacing, particularly related to impacts of the "barrier effect" on birds are important considerations for the alternatives analysis in the EIS.
- The EIS should consider if the number of turbines can be reduced.
- The EIS should consider if the size of the turbines can be decreased or limited (capped at a specific size that could not be observed from the shore).

- EPA recommends that alternatives that minimize impacts to offshore habitat be discussed. For the layout of the WTGs, OSSs, and inter-array cables in the lease area, the EIS should clarify what minimum scenarios would achieve the required megawatt (MW) of energy generation to identify flexibilities. It would also be beneficial to clarify location of resources, including sensitive habitats, to prioritize impact avoidance. Micro-siting efforts for WTGs and cable routes should be fully evaluated.

#### 2.3.2.2 Cables and Landfalls

- Commenters expressed varying opinions about the cable corridors and landfall locations that should be selected.
  - The proposed Project should include an alternative that does not cut through/cross inland bays and areas (i.e., Indian River Bay, Old Basin Cove, Beach Cove). Other commenters indicated that any routing through these areas should be entirely avoided and removed from consideration.
  - The proposed landfall locations and terrestrial routing in Delaware should be relocated to locations and routing in Maryland.
  - The proposed substation at 3R's should be avoided in favor of the Towers Road beach location.
  - The proposed onshore export cable corridor should avoid the Tower Shores neighborhood.
  - The proposed Project should evaluate a wider range of landfall locations that avoid critical areas.
  - Alternatives should be included that avoid and minimize impacts to sensitive and vulnerable habitats (e.g., rocky habitats and sand ridge complexes) within the lease area and offshore export cable corridor.
- Export cable voltage level should be lower (less than 230 KV) to interconnected to closer electrical substations in Maryland. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed should be considered.
- The alternatives in the EIS should consider the potential for fewer impacts associated with high voltage direct current (HVDC) versus alternating current (HVAC) cable technology.
- The amount of export cables and inter-array cables should be minimized, and cable burial depths need be sufficient enough to minimize risk to and from the cables when crossing existing vessel traffic routes to minimize risks to the cable from a dropped anchor or other economic losses from interactions with export cables.
- The EIS should consider alternatives that include evaluation of infrastructure that would provide the means necessary for a shared transmission system to minimize the number of export cables required offshore, the number of beach landings, and other inland impacts.
- Cable placement/alignment needs to consider existing vessel traffic routes and the Coast Guard's proposed Cape Charles to Delaware Bay Fairway, minimize impacts to wetlands and benthic resources, and incorporate industry best practices, such as crossing perpendicular to prevailing vessel traffic all navigation channels. Cable route alternatives should conform to industry practices and reduce navigation risks.
- A full range of reasonable alternatives to the proposed offshore and inshore export cable corridors and landing site options should also be considered and evaluated to avoid and minimize impacts on sensitive habitats in the Project area.
- Options for avoiding and minimizing impacts related to the methods of construction and routes that allow for full cable burial to minimize permanent habitat impacts and potential interactions with fishing gear should be considered.

- Commenters suggested running planned cables into the existing Indian River Power Plant to reduce impact to state parks, neighborhoods, and associated resources.
- The EIS should analyze the alternative terrestrial cable corridor routes as distinct alternatives.

#### 2.3.2.3 Project Relocation

- The proposed Project should be relocated to new lease areas farther off the Delaware and Maryland coast offshore to minimize visual impacts.
- BOEM should adopt a 30-mile turbine exclusion zone from the shoreline.
- The proposed Project should be farther offshore with commenters providing a variety of minimum distances ranging from 15 to 30 miles offshore, however, the majority of commenters indicated a minimum distance of 30 miles offshore.

#### 2.3.2.4 Other Comments on Alternatives

- The EIS should consider alternatives to using monopiles and consider construction alternatives to avoid the use of pile driving.
- The proposed Project should consider quieter foundation types such as screw driven foundations, gravity-based suction bucket foundations or caisson foundations.
- The EIS should include a range of reasonable alternatives with one or more alternatives to avoid and minimize adverse impacts to NOAA trust resources.
- The proposed Project should include a fisheries habitat impact minimization alternative that focuses on two separate issues.
    - An alternative route to the proposed crossing of Indian River Bay; and
    - Avoidance and minimization of impacts to sensitive and vulnerable habitats throughout the entire project area. This may be accomplished through the inclusion of a single fisheries habitat impact minimization alternative, or through the inclusion of two separate alternatives.
- The EIS should consider an alternative that limits or avoids development within areas of the lease that may adversely affect important benthic features, including sand ridges and banks and ridge and swale complexes. The alternative should also consider the material and composition of any proposed scour protection, for both cables and turbines, as well as the necessary spatial extent of such scour protection while considering how different types of materials employed (e.g., size, shape) may affect the habitat value for early life stages (e.g., juveniles) of species, such as clearnose skate and summer flounder.
- A full range of reasonable alternatives to the proposed offshore and nearshore export cable corridor should be considered and evaluated, including an alternative to avoid and minimize impacts to important, sensitive, and complex habitats located within the project area including an alternative that evaluates how cable installation and operation may impact these habitats and sensitive life-history stages of managed fish species and their prey, and identify ways to avoid and minimize impacts to these resource.
- One comment stated that the cumulative impacts analysis should be separate and distinct from predicting the effects of the “no action” alternative, and the two analyses should remain separate and distinct. It is appropriate to incorporate the effects of past and ongoing actions, including the approved Vineyard Wind and South Fork Wind projects, into the baseline condition for each resource (which can be incorporated by reference in the cumulative impacts analysis) for which to evaluate the effect of no action and for use in comparing the effects of the action alternatives against no action.
- Commenters voiced support for offshore wind but only in a manner that minimized impacts to the environment.

- Commenters expressed concern that the reliability of offshore wind power has not been demonstrated.

### 2.3.3 Bats

Bat comments included reference to the importance, and lack of current bat research, long-term monitoring, and adaptive management plans. Topics and recommendations included the following:

- The EIS should conduct research to determine impacts to bats during construction and during turbine operation using the best available technology. Methods could include acoustic monitoring, radar, migration studies, sensors, and thermal cameras. Additionally, the EIS should consider a post-construction bat monitoring plan that includes a commitment to integrate strike detection technology, as it becomes commercially available and feasible to install offshore.
- The EIS should work with biologists in affected states to prepare a minimization/mitigation plan to reduce impacts to bats. The plan could include reduced use of turbines during migration seasons, acoustic deterrents, automated programs to predict bat collisions and curtail turbines during periods of likely collisions, and determine regional and cumulative impacts.
- It was noted that US Wind's COP did not include the federally-threatened long-eared bat, and that this bat has been documented offshore in the region.
- US Wind should consider deploying a Motus tower in the Project area and support nanotagging of bats to understand bat use of the Lease area.
- There was concern that the sparse data available on bats' use of the offshore environment in the region were insufficient to draw conclusions that bat risk is negligible, as stated in the US Wind COP.

### 2.3.4 Benthic Resources

Benthic resource comments included the need to address impacts resulting from structure installation and decommissioning as well as resultant sand scouring/accumulation in the area. Multiple comments referenced the type of materials used in the monopile structures and the potential for habitat enhancement. Benthic habitat refers to habitat on the sea floor, including natural structures and vegetation. Topics raised in this category included the following:

- Commenters expressed concern with the underwater foundation structures and the impacts of the underwater currents on sand migration. It is suggested that a sand migration study be completed and included in the EIS.
- US Wind should consider the use of monopile base design(s) that provide an enhanced marine fishery environment, that may increase sport fishing use in the area and possibly increase fish availability.
- The EIS should consider additional materials, including gravel and large stones, around the base of the monopiles to attract marine life, and enhance the plan and animal life in the area. These substrates may provide increase biodiversity and biomass, resulting in a net benefit to the aquatic environment.
- The EIS should address concerns regarding the effect of the vibration from wind turbine generators on the aquatic organisms.
- Commenters expressed concern with the effects of horizontal drilling and burying of the four high-capacity cables in the Delaware State Park. Resources of concern included the ocean floor, ocean currents, the dune system, horseshoe crab breeding grounds.
- Commenters expressed concern with the lack of environmental studies on the long-term effect on the marine populations.

- The EIS should evaluate the bottom sediments in the project area to understand the potential for environmental effects associated with project-related and historical (previous dredge spoil disposal) contamination. Sources of contamination should be addressed.
- The EIS should address the "wake effect" created by the turbine and substation foundations, and the potential for sediment suspension. Increased sediment suspension could impact filter feeding organisms, scallops, and pelagic larvae.
- Commenters were concerned with the scouring/uprooting of foundations and buried cables located under the seafloor and the lack of completed geotechnical work in the project area.
- Commenters noted there was a lack of detailed habitat data in the US Wind COP that limits their ability to provide technical and site-specific recommendations for the EIS.
- Commenters expressed concerns for the complex habitats that occur in the lease area and particularly along the export cable corridor, including rocky habitats, sand ridge complexes and other habitats that provide a migratory pathway, spawning, nursery, and forage habitat for marine species. The EIS should fully explore alternative export cable routes to avoid adverse impacts to the aquatic resources of the Indian River complex.
- The EIS should address the potential for additional scour protection that may be required to manage depressions left by spuds/jack-up vessels used for pile installation - potentially further increasing the area of scour protection.
- The EIS should address ecological impacts resulting from the loss of seabed and the associated benthic communities and forage base. The assessment should include a discussion of the ecological and economic impacts associated with habitat conversion from the installation of WTGs, offshore substations, cables, and scour protection.
- The EIS should address the consequences of biological resource surveys, including the potential for capture and collection of protected species.
- The EIS should address the effect of decommissioning on the benthic environment, with impacts completed at scales relevant to each impact type to enable meaningful comparisons between alternatives.
- For benthic resources, fish, and invertebrate species, this section should include an assessment of species status and habitat requirements, including benthic, demersal, bentho-pelagic, and pelagic species and infaunal, emergent fauna, and epifaunal species living on and within surrounding substrates.

### 2.3.5 Birds

Comments related to birds included addressing biological, structural, or habitat impacts on the species or their habitat. Topics raised in this category included the following:

- BOEM should include research and analysis on bird fatalities by heavy metal pollution, which is caused by power plants.
- BOEM should continue to protect open areas of ocean in between wind farm leases to allow migratory birds to navigate around the structures and have unobstructed access to shoreline habitat areas for their own rest and sustenance during migration.
- The EIS should identify that the potential impact of greatest concern is to marine and avian life, which should be considered the highest priority in design, construction and maintenance. Impacts from exposure to an electromagnetic field or habitat displacement should also be discussed.
- The EIS should discuss that offshore wind farms have far fewer bird strikes due to limited bird species inhabiting the surrounding area. Birds will instead benefit from the wind farm's artificial reef and increased biodiversity and food availability within the area. Several studies have quantified the estimated rate of impact of the proposed wind farm on bird mortality, finding wind farms have a lower mortality rate than fossil fuel-induced climate change and other anthropogenic

factors. Studies found that few species fly far enough from the coast where the wind farm could interfere with their normal flight pattern.

- The EIS should discuss the wind farm's location within the Atlantic Flyway, which is the migration flight pattern used by species of birds along the East Coast. Research found that some strikes may occur for birds using the Atlantic Flyway for migration, but they can also benefit by using the wind farm's reefs to forage. The siting of the lease area (11 to 27 miles from shore) also takes into account that migratory songbirds generally do not fly further than 10 miles from shore.
- Commenters suggested that the EIS should state that the impact on migratory bird pathways will result in bird kills of unknown proportions.
- BOEM must require an explicitly defined monitoring and adaptive management plan and use the best available science. The EIS should build on the avian risk assessment and bird monitoring plan outlined in the COP. This must include a requirement for sufficient standardized monitoring before and after construction, consistent with recommendations that emerge from the Regional Wildlife Science Collaborative (previously called the Regional Wildlife Science Entity).
- One commenter suggested that the EIS should discuss offshore wind farms and their impact on birds using the Atlantic Flyaway on their seasonal migrations. This commenter suggested that an important replenishment area along the Delaware Coast and Delaware Bay area will be negatively impacted by these windfarms.
- Commenters suggested that BOEM should consider that even if birds are not directly killed, the site may cause changes in migratory patterns, potentially disrupting food chains along the coast.
- The EIS must address potential population level, cumulative impacts to avian populations from developing the Project and other offshore wind developments expected in the reasonably foreseeable future.
- BOEM should continue to interpret the Migratory Bird Treaty Act (MBTA) to encompass "incidental takes" of migratory birds, including from wind turbines, and should disregard the U.S. Department of the Interior Memorandum M-37050 (December 22, 2017), "The Migratory Bird Treaty Act Does Not Prohibit Incidental Take," which has been found to be unlawful in court. Importantly, BOEM should acknowledge its obligations under the MBTA.
- One commenter provided suggestions on which specific avian species should be analyzed in the EIS, and the reasons for including the impacts analysis for these species. They suggest that BOEM must consider impacts to a broad range of avian species which may be impacted by the Project, not limited to Endangered Species Act (ESA)-listed species. Federally endangered species which have International Union for Conservation of Nature (IUCN) status include the piping plover, the red knot, and the roseate tern. Several species are Maryland State endangered or threatened species as well as IUCN listed, including the common tern, gull-billed tern, mourning warbler, least tern, and the black skimmer, which is also a U.S. Fish and Wildlife Service (USFWS) Bird of Conservation Concern. Wilson's plover and royal tern are also Maryland State endangered species, and the Forsters' tern is Maryland State listed as "in need of conservation." USFWS Birds of Conservation Concern include the American oystercatcher, whimbrel, Hudsonian godwit, ruddy turnstone, dunlin, purple sandpiper, pectoral sandpiper, semipalmated sandpiper, short-billed dowitcher, lesser yellowlegs, and willet. The Bicknell's thrush, which is IUCN vulnerable, is a nearctic-neotropical migrant of highest conservation concern, with rare occurrence in the Project area during migration. The blackpoll warbler is IUCN near threatened and is commonly observed during migration in Ocean City. Twenty-seven offshore species were detected in the Project area using digital aerial surveys and ship-based surveys; 47 offshore species have been identified as occurring in the OCS-A-0490 lease area. Offshore birds include the following five species that will be potentially impacted by the Project: northern gannet, black scoter, common loon, red-throated loon, and white-winged scoter. Importantly, although the black-capped petrel is listed as a "species of interest" in the COP, it is

proposed for listing under the ESA as threatened and may be impacted by offshore development, especially in deeper water nearer the continental shelf edge.
- One commenter stated that, rather than mitigate effects, the EIS should discuss the most effective action, which is to avoid siting offshore wind farms in areas that will interfere with migratory migration, as attempts to change bird pathways are less effective, and avoidance behavior may have its own adverse effects.
- One commenter suggested that BOEM should not rely upon pre-construction acoustic surveys to determine whether post-construction monitoring is necessary for nocturnal migratory birds. Instead, US Wind should develop an avian monitoring plan that includes a commitment to integrate strike detection technology, as it becomes commercially available and feasible to install offshore. They also encouraged US Wind to consider expanding their monitoring methodology to include marine/weather radar and install a Motus sensor array that would detect both birds and bats in the project area as soon as technically feasible and support nano-tagging of bird and bats to better understand use of the lease area. They suggest that monitoring should include placement of the FLiDar buoy.

### 2.3.6 Climate Change

Comments related to climate change focused on the urgency to develop renewable energy options to offset the use of fossil fuels and slow climate change. Topics raised in this category included the following:

- The EIS should include an analysis of what an equivalent amount of energy production through fossil fuels would cost in terms of environmental impact and the climate crisis – a comparison between the wind project and continuing with fossil fuel use for a specified time period.
- Commenters expressed the importance of offshore wind and other renewable energy sources to reduce greenhouse gas emissions and aid in mitigating the impacts of climate change, including threats to water quality, hydrologic changes, loss of habitat, increased nutrient pollution, increased intensity and frequency of coastal storms and erosion, increased sea level rise, and increased heat that prevents restoration of important watershed ecosystems such as wetlands and forests.
- Commenters discussed the vulnerability of the Del Marva Peninsula to sea level rise and the effects it may have on the bayside area and regional farmland.
- Commenters stated that the offshore wind project should be accomplished in a way that minimizes marine impacts and maximizes the positive impact associated with mitigating climate change.
- Commenters discussed the importance of reduced particulate matter associated with the transition from fossil fuels to renewable energy, and the potential health benefits of this alternative.
- Commenters noted the effects warming ocean temperatures and increased ocean acidity my have on the marine environment and its inhabitants and dependents.
- Commenters discussed the significance of climate change-induced sea level rise and the flooding concern in Sussex County.

### 2.3.7 Coastal Zone Consistency

Comments that addressed compliance with the Virginia Coastal Zone Management (CZM) Program. Topics raised in this category included the following:

- In order to ensure an effective coordinated review of the environmental documents, the Virginia Department of Environmental Quality, through its Office of Environmental Impact Review (DEQ-OEIR), requested notification be sent directly to OEIR or made available for download at a website, file transfer protocol (ftp) site or the VITA LFT file share system. The environmental

documents should include U.S. Geological Survey topographic maps as part of their information, and inclusion of shape files is encouraged with the NEPA document. In addition, project details should be adequately described for the benefit of the reviewers.
- The EIS should include studies that determine how the high-capacity cable landings will alter ocean currents and growth of the local dune system.
- Commenters noted that the project will likely adversely affect Delaware beaches' fragile dunes and possibly cause erosion of the near seabed.

### 2.3.8 Commercial Fisheries and For-Hire Recreational Fishing

Comments discussed economic and social aspects or impacts on commercial fisheries, commercial fishing operations, and for-hire recreational fishing operators. Topics raised in this category included the following:

- The EIS should consider the impacts to commercial fisheries for the entire process including construction, operations, and decommissioning.
- The turbines would restrict access for commercial fisheries and charter (i.e., for-hire) fisheries, due to presence of structures (WTGs, substations, cables, scour protection) thereby increasing operational costs to travel further to different locations, increasing risk to gear damage or loss, and the potential for overfishing of areas outside of the Lease Area.
- The EIS should explain that the proposed 0.77 x 1.02 nm grid layout of the projects will not eliminate all concerns about safely fishing, maneuvering, drifting, or anchoring near turbines and offshore substations. Safety considerations will vary based on weather, gear type, vessel size, and specific fishing practices which can vary by target species."
- Fisheries' surveys to conduct stock assessments for fishery management plans and regulations would be affected by the Project, which could result in reduced fishery quotas due to potential population impacts and increased scientific uncertainty.
- NMFS believes that the Project is anticipated to have major adverse impacts on NMFS Northeast Fisheries Science Center scientific surveys, which will, in turn, result in adverse impacts on fishery participants and communities, conservation and recovery of protected species, and on the American public.
    - This project would have direct impacts on the federal multi-species bottom trawl survey conducted on the FSV Henry Bigelow, the surfclam and ocean quahog clam dredge surveys conducted on chartered commercial fishing platforms, the integrated benthic/sea scallop habitat survey, ship and aerial-based marine mammal and sea turtle surveys, Large Coastal Shark Bottom Long-line Survey, and the shelf-wide Ecosystem Monitoring Survey (Ecomon).
    - Based on standard operating practices conducted by the NOAA Office of Marine and Aviation Operations, WTG arrays would preclude safe navigation and safe and effective deployment of mobile survey gear on NOAA ships.
    - Adverse effects on monitoring and assessment activities would directly impact the critical scientific information used for fisheries management and the recovery and conservation programs for protected species. These impacts would result in increased uncertainty in the surveys' measures of abundance, which could potentially lead to lower quotas for commercial and recreational fishermen and lower associated fishing revenue based on current fishery management council risk policies. These impacts will occur over the lifetime of wind energy operations at the project area and in the region (to at least 2050).
- The EIS should also consider potential impacts beyond the vessel owner level to include shoreside support services (e.g., dealers, processors, distributors, suppliers), including impacts to vertically integrated businesses as well as coastal communities dependent on fishing and consider social indicators for coastal communities.

- The EIS should ensure that importance is not measured solely based on dollar value or volume of landings. Other factors including, but not limited to, the number of participants, impacted communities, seasonal importance, and use (e.g., a lower value species harvested for bait in a higher value fishery) must also be considered.
- BOEM should also rely on NMFS for guidance on how to analyze the potential impacts of the project on marine species (including species targeted by commercial and recreational fisheries and protected species), marine habitats, and socioeconomic impacts for commercial and recreational fisheries, fishery support businesses, and fishing communities. NMFS should also be consulted to ensure a thorough understanding of the limitations of each data set. Important data limitations should be supplemented with stakeholder input.
- The EIS should use information derived from a new data request for this project area that combines the two areas previously evaluated, which would allow the integration of more accurate and updated data on fisheries and communities that are affected by this project. We encourage you to coordinate with NMFS' Greater Atlantic Regional Office (GARFO) for updated data requests.
- NMFS encourages coordination with the highly migratory species (HMS) Office and the Southeast Regional Office and Southeast Fisheries Science Center for more information about affected HMS fisheries. While the COP primarily discusses affected fishery revenue, it is also important to discuss affected fishery landings. For example, some affected fisheries (menhaden and spiny dogfish) are low-value, high-volume fisheries. Due to their low value, the importance of these fisheries as a source of sustainable food and bait and the secondary economic benefits to specific affected communities and portside support services that rely upon these fisheries are underrepresented in the COP. This should be rectified in the EIS.
- The EIS should gather additional information where data are sparse, such as for recreational fisheries.
- The EIS needs to consider the cumulative impact of lost commercial fishing revenue, and the impact on US seafood stocks.
- The EIS should evaluate the cumulative impacts of multiple projects on fishing operations, such as changes to time and area fished, gear type used, fisheries targeted, and landing ports. Some fishing vessels operate in multiple areas that may be subject to wind project development. While some may choose to continue to fish in these areas, others may be displaced from one or more project areas and fish in different areas outside the project areas. Similarly, vessels may avoid transiting through project areas, incurring increased steaming time to/from fishing grounds and ports.
    - These changes are important to consider because it would likely become more difficult for fisheries to transit or find alternative fishing locations, resulting in increased cumulative impacts to fishing operations as more projects are constructed.
    - The EIS should consider the socioeconomic impacts on fishing communities that cannot relocate fishing activity due to cultural norms (fishing grounds claimed or used by others), cost limitations (too expensive to travel greater distances to other fishing areas), and other relevant limiting factors such as fishing permits and associated regulations.
    - Shifts in fishing behavior, including location and timing, may result in cumulative impacts to habitat, as well as target and bycatch species (both fish and protected species) that have not been previously analyzed in fishery management actions.
    - Reduced regional scientific survey access to project areas could increase uncertainty in associated stock assessments and result in more conservative quotas that would negatively impact fishery operations in all fisheries.
- The menhaden, horseshoe crab, and conch/whelk fisheries are not well represented in federal data collections due to existing reporting requirements for those fisheries. NMFS recommends the EIS consider alternative sources including state data and federal processing reports to fully evaluate

such fisheries. Further, the EIS should more comprehensively assess historic and recent fishery operations using available vessel monitoring system (VMS) data instead of only considering automatic identification system (AIS) data. As we have noted for previous projects, AIS data are incomplete and only cover a portion of fishery operations.

- The EIS should describe how impacts may vary by target species, gear type, fishing location (e.g., from shore, mid-water, on different bottom types, near structures such as shipwrecks, other artificial reefs, or boulders) and commercial or recreational fishing (including recreational fishing from shore, private vessels, party/charter vessels, and tournaments).
- The EIS should include studies specific to commercial species in the region, including, scallops, conch, and whelk.
- The EIS should consider changes to physical oceanographic conditions which may affect habitats, the Mid-Atlantic Cold Pool, which may affect reproduction of commercially important species or their prey.
- The EIS should assess impacts to fishery species (i.e., resource distribution, productivity, or abundance changes) caused by the temporary or permanent loss/conversion of bottom habitat and changes in the benthic environment, including increased turbidity and noise during construction and the permanent effect of placing hard substrates on the seafloor (e.g., structures, scour protection).
- The Project should avoid areas that could interfere with shellfish aquaculture activities or high-density hard clam areas.
- It was suggested that mitigation/compensation arrangements be discussed with affected fisheries.

### 2.3.9 Cultural, Historical, and Archaeological Resources

Comments related to cultural resources include those related to archaeological, historic architectural, or tribal resources or concerns. Topics raised in this category included the following:

- BOEM should fully assess and consider impacts upon all cultural and historic resources that may be impacted, whether directly or indirectly.
- BOEM should require an independent evaluation of the potential negative economic and cultural impacts that the new super-sized turbines would have on Ocean City and the surrounding area.
- BOEM should conduct additional visual assessments and simulations and provide consulting parties and the public with adequate and easily accessible information that informs all parties of potential impacts.
- BOEM should require revisions to the COP on all aspects of visual impacts to historic properties so that meaningful consultation with BOEM can occur as required by federal law.
- Commenters expressed concern that the US Wind COP falls short of the NHPA's mandates; including a full assessment of effects on all properties within the counties listed or eligible for listing in the National Register of Historic Places that are likely to experience adverse visual effects. This will allow residents to understand the nature and extent of those effects.
- Commenters expressed concern for Cape May County and stated that BOEM must carefully consider the impacts on the County's unique character, which qualifies as a "resource" under NEPA's definition. Spoliation of the County's historic landscape may lower property values or tourism revenue.
- The NPS noted that there are National Historic Landmarks (NHL) in New Jersey (Cape May County0 and Delaware (Kent County [Aspendale NHL, John Dickenson House NHL]; Sussex County [Lightship LV-118 NHL]) that should be considered

### 2.3.10 Demographics, Employment, and Economics

Comments related to employment and job creation as a result of the construction, operation, and maintenance of the proposed wind farm are captured in this section. Topics raised in this category included the following:

- Commenters expressed excitement for the jobs that the project would provide to local residents. Many workers in this region have to travel to find work, so people are excited that workers will be able to spend more time with their families while they are employed locally.
- Commenters are also looking forward to the prospect of local job creation associated with renewable, clean energy, a 'win-win'. Additionally, because many of the jobs in the region are seasonal and minimum wage, this project could have a real economic impact and will create more opportunities.
- Commenters expressed excitement about the project engaging with smaller and minority-owned businesses.
- Commenters are concerned with the number of jobs going to European countries instead of Maryland and Delaware. Others mentioned that none of the benefits will go to Delaware, and that all of the energy and jobs will go to Maryland.
- Commenters commented on the dual job creation of the Sparrows Point Steel facility and the offshore wind project. These individuals are generally supportive of clean energy job creation.
- Commenters requested further information on how the shift to renewable energy and associated construction costs will impact the financial bottom line, specifically about how the project will impact electricity and billing, especially considering high cost of living and inflation.
- Concern was raised about the lack of inclusion of some stakeholders, including North Bethany and Salisbury University.
- Commenters suggested that the EIS should include quantitative analysis of the potential biological, social, and economic costs of the project on fishing industries and communities. Additionally, the EIS should include an analysis of affiliated non-market social impacts of fishing activities and construction, including impacts to cultural norms, fishermen, fishing community social relationships, and health and well-being of fishermen communities.
- One commenter addressed energy independence of the US given the war in Ukraine, and the possibility for the US to be a leader in the energy independence transition.
- Residents felt that the project would result in significantly higher energy costs and less reliable power.

### 2.3.11 Electromagnetic Fields (EMF)

Comments addressed the lack of research regarding EMFs and the effects they will have on wildlife and humans. Topics raised in this category included the following:

- The EIS should include an EMF sensitivity study as the project is being built within the Carl N. Shuster Jr. Horseshoe Crab Sanctuary. The study should address the potential impacts on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs. Alternatives that do not include negative impacts should be developed and assessed in the EIS.
- An EMF study should also include human impacts as the cable landfall is proposed in a heavily utilized area of Delaware State Park, including a beach and bay where children play and where fishing is conducted.
- The EIS should include a thorough description of the potential effects of the EMF on the behavior, movement, and migration for demersal and pelagic fish, and shellfish species.

- Commenters expressed concern with the significant lack of research regarding the EMFs that marine animals use as life sustaining sensory input. It is also not understood how the EMFs generated by the web of undersee cables will impact marine animals.
- The EIS should consider moving the project further offshore as the additional distance would reduce the impact on endangered and vulnerable species.

### 2.3.12 Environmental Justice

Comments pertaining to environmental justice included suggestions to assess adverse and beneficial impacts on these communities. Topics raised in this category included the following:

- Commenters suggested that the EIS should include analysis that supports moving away from fossil fuel production to ensure the continued and consistent protection of vulnerable communities from increasingly dangerous effects that climate change produces, including sea level rise, heavy rains, flooding, and extreme heat. A 65-year-old man has already passed this year from heat-related issues, which is a real reminder to residents of how imperative it is to begin the transition to clean energy.
- Commenters suggested that the EIS should analyze the connection between cleaner energy and lowered air pollution that is devastating to residents, especially children, with regards to respiratory illnesses and cancer risks that are exacerbated by atmospheric toxins.
- The use of shore power and electric cargo handling should be considered to lower air emissions around docks and ports where many environmental justice communities are located.
- The analysis should include a community engagement plan so that residents have direct involvement as stakeholders to projects that directly affect them and their families.
- Commenters suggested that the EIS should design a plan to engage and educate youth (middle school age was suggested) about renewable energy projects, as they are the ones who will continue to protect vulnerable populations in the future.
- The EIS should include analysis of the beneficial impacts that low-income and minority communities will experience as a result of offshore wind projects, and how these populations specifically will benefit.
- The EIS should include analysis of job opportunities for low-income and minority communities in the development and construction of offshore wind projects. Along with job creation, other types of funding assistance in communities with environmental justice concerns should also be examined.
- Commenters suggested that specific measures on how to protect commercial fishing communities around the areas of analyses should be described in the EIS.
- The EIS should ensure the protection of tourism within each community, because lower-wage service workers in restaurants, hotels, and the fishing industry depend on its preservation.

### 2.3.13 Finfish, Invertebrates, and Essential Fish Habitat

Finfish, invertebrates, and Essential Fish Habitat (EFH) comments address fish, crustaceans, and other sea animals (other than sea turtles or marine mammals). Topics raised in this category included the following:

- Commenters expressed concern for fish species and impact to recreational fishers in the Indian River Bay from noise and sedimentation during cable installation/burial in shallow water and from the EMF during operations.
- Provision of high-resolution benthic habitat maps early in the process is important for evaluating impacts and considering how to best minimize impacts. These data are needed for the essential fish habitat consultation process, which is designed to avoid impacts wherever possible and determine mitigation measures where impacts cannot be avoided.

- The affected environment and impacts analysis, including the EFH assessment, should consider how installation during different seasons will affect particular species and life stages during spawning, juvenile settlement, etc.
- The EIS should discuss seasonal changes and long-term trends in the environment as well as hydrodynamic regimes and how they influence the distribution and abundance of marine resources. Within this section, the EIS should include results of on-site surveys, site-specific habitat information, and characterization of benthic and pelagic communities. Additional details should be provided related to all habitat types located in the project area that may be directly or indirectly impacted by project construction and operation, including complex habitats and prominent benthic features in the project area.
- The "Affected Environment" section should also include all of the biological, cultural, and socioeconomic issues related to fisheries and marine resources that may be affected by this project, including species that live within, or seasonally use, the immediate project area and adjacent locations. For benthic resources, fish, and invertebrate species, this section should include an assessment of species status and habitat requirements, including benthic, demersal, bentho-pelagic, and pelagic species and infaunal, emergent fauna, and epifaunal species living on and within surrounding substrates.
- The EIS should discuss both direct and indirect impacts on marine resources.
- The presence of structures is likely to result in both local and broader oceanographic effects, and may disrupt aggregations and distribution of prey species, alter the strength of tidal currents and associated fronts, and may change primary production, the degree of mixing, and stratification in the water column.
- The EIS should identify and describe habitats that support particularly sensitive life stages of species should be identified and described. The evaluation of impacts from project construction, operation and maintenance, and decommissioning should evaluate the potential for recovery and the anticipated recovery times based on the habitat type and components that would be impacted. The variability in recovery times by habitat type and components should be fully discussed and analyzed in the document.
- The EIS should include an analysis of impacts on habitat displacement and conversion of marine habitats resulting from the introduction of new hard surfaces to the ocean floor.
- The EIS should include detailed information on the effects of Project construction and operations on highly migratory species. The proposed project area is designated EFH for a number of Atlantic HMS (i.e., tuna, swordfish, billfish, small and large coastal sharks, and pelagic sharks) including, but not limited to sandbar shark, sand tiger shark. and dusky shark. Both the sand tiger shark and dusky shark have been listed as a Species of Concern by NOAA.

### 2.3.14 General Support or Opposition

Comments expressed general support or opposition for the Project. Some commenters provided comments of support or opposition without providing a justification. Other commenters referred to generic resource topics as a justification for their support or opposition. Commenters are generally supportive of the proposed Project because it may reduce fossil fuel dependance, reduce climate change impacts, increase job opportunities, add to the aesthetics of the ocean view, improve human health, or add habitat for marine fisheries. Commenters are generally opposed to the proposed Project because it may adversely affect commercial fisheries, navigation, visual quality, the local economy (e.g., tourism, real estate), marine wildlife and habitat, or electricity rates. Commenters proposed moving the Project farther from shore, landing the cable in a different location, conducting long-term studies to assess potential ecosystem impacts, and adjusting the number and placement of turbines to reduce long-term impacts.

### 2.3.15 General Wildlife

Comments addressed harm or death to multiple types of species due to construction and operation, particularly marine mammals, horseshoe crabs, sea turtles, and migratory birds. Topics raised in this category included the following:

- The EIS should consider impacts on birds (local and migratory), and other marine species. Impacts may include the potential to reduce, fragment, or degrade habitat and direct threats to flying wildlife.
- Commenters expressed concern for the migration of Endangered North Atlantic right whales, sound wave impact on marine life during construction and operation, impacts to the Atlantic Flyway (bird migration), the health of the horseshoe crab (vital to medical research), and monarch butterflies.
- Commenters were concerned about impacts to Assateague Island, home to over 300 bird species, including eagles, falcons, and herons as well as horseshoe crabs in Delaware Bay.
- Commenters were concerned with the disruption of whales, porpoises, and other marine mammals during the construction phase of the project, including produced noise.
- Commenters discussed that the wind farm may benefit marine organisms and increase their abundance due to the additional habitat provided by the foundation structures.
- The EIS should include completed long-term studies for the protection of marine and bird species, including the North Atlantic right whale, horseshoe crabs, migratory birds, and terrapins.
- The EIS should evaluate potential impacts on loggerhead turtles; migratory shorebirds; waterfowl; ospreys; bald eagles (forage in the project area); marine mammals including bottlenose dolphins, pilot whales, fin whales, humpback whales, sperm whales, sei whales, and fin whales; fish; and insects.
- US Wind should measure the underwater sound levels of the proposed turbines and adopt a mitigation strategy to protect the North Atlantic right whales and other endangered species.
- Commenters suggested that BOEM reject or defer the US Wind proposal until all associated environmental studies are completed.
- Commenter expressed concern that the proposed project is located within the Carl N. Shuster, Jr. Horseshoe Crab Sanctuary.
- Commenters discussed potential adverse effects and the Delaware Bay and coastline, particularly foraging grounds for sea turtles, birthing and feeding grounds for bottlenose and other dolphin species, and winter habitat for seals.
- Commenters discussed alternative energy sources that may have less impact on wildlife, including solar, geo-thermal, green hydrogen, and net-zero housing designs.
- The EIS should acknowledge and identify data gaps regarding abundance, distribution, and habitat use of ESA and MMPA protected species in the US Wind project area and include an analysis regarding the uncertainty of any determinations made in the EIS.
- The EIS should fully evaluate the impact of the construction and operation of the project on horseshoe crabs and the migratory birds that rely on them.

### 2.3.16 Marine Mammals

Comments about marine mammals address the need for additional research and monitoring prior to, and during construction, and potential impacts to sensitive species due to structural installations, and increased noise and vessel traffic. Topics raised in this category included the following:

- Commenters discussed EMFs created by the subsea cable and the negative effects they may have on the North Atlantic right whale, bottlenose dolphins, sea turtles, and other marine life.

- The EIS should include additional research on potential impacts to marine mammals and sea turtles from changes in turbulence resulting from increased artificial structures in the water column. Research should include food resource monitoring in waters experiencing increased turbidity resulting from modifications to the wind field and installed turbine foundations.
- The EIS should include additional research on the effects of EMFs on marine mammals and sea turtles to determine the potential for these EMF to disrupt or alter migration patterns of these species.
- BOEM should require:
  - No pile driving between November 1 and April 30;
  - A visual and acoustic clearance zone and exclusion zone of at least 5000 meters for whales and dolphins around each vessel conducting activities with noise levels that could result in injury or harassment;
  - A minimum of 10 dB (SEL) must be attained in the field during construction in combined noise reduction and attenuation;
  - Field measurements should be conducted on at least the first three piles installed, and ideally periodically throughout project construction;
  - Both near and far-field best available control technologies must be used to attain the maximum level of noise reduction and attenuation possible; Monitoring of the acoustic clearance and exclusion zone will be undertaken using near real-time passive acoustic monitoring (PAM), assuming a detection range of at least 10,000 meters;
  - Monitoring should be undertaken from a vessel other than the pile driving vessel, or from a stationary unit, to avoid the hydrophone being masked by the pile driving vessel or development-related noise;
  - If a small whale or dolphin is visually or acoustically detected within the 5000-meter clearance zone, activities with noise levels that could result in injury or harassment should not be initiated;
  - If a North Atlantic Right Whale is detected acoustically or visually detected within the 5000-m visual exclusion zone, pile driving must be halted;
  - Monitoring of the visual clearance and exclusion zone will be undertaken by vessel-based PSOs stationed at the pile driving site and on additional vessels, as appropriate, to enable visual monitoring of the minimum 5,000 meter clearance zone within pre-clearance monitoring period and during pile driving activity;
  - On each vessel, there must be a minimum of four PSOs following a two-on, two-off rotation, each responsible for scanning no more than 180° of the horizon per pile driving location;
  - Additional vessels must survey the clearance and exclusion zones at speeds of 10 knots or less;
  - Following shutdown for protected species, acoustic and visual monitoring of exclusion zone for 60 minutes and clear of protected species for 60 minutes prior to initiating soft start. Visual observation of the minimum 5,000-m visual clearance zone should continue until 30 minutes after pile driving restart;
  - Acoustic and visual monitoring must be required and begin at least 30 minutes prior to the commencement or re-initiation of the activity and be conducted throughout the activity;
  - Monitoring of the acoustic clearance zone should be undertaken using near real-time PAM from a vessel other than the survey vessel, or from a stationary unit, to avoid the hydrophone being masked by the survey vessel or development-related noise;
  - Monitoring of the visual clearance zone should be undertaken by vessel-based protected species observers stationed on the survey vessel to enable monitoring of the entire 5,000-m clearance zone for marine mammals. On each vessel, there must be a minimum of four observers following a two-on, two-off rotation, each responsible for scanning no more than 180° of the horizon;

  - All personnel working offshore should receive training on observing and identifying marine mammal species; and
  - All vessels responsible for crew transport should use thermal detection systems to supplement visual monitoring of marine mammals.
- The EIS should measure the underwater sound levels of construction and of the proposed turbines in operation and adopt a mitigation strategy to protect the North Atlantic right whales and other endangered species and ocean life.
- The COP does not define "rare" or "uncommon" marine mammal labels. It was unclear what estimated max density threshold in the Project area and adjacent waters led to further examination and review by US Wind within the COP or why harbor porpoises were omitted from this analysis.
- BOEM should provide the harbor porpoise with specific attention given its sensitivity to noise.
- The EIS should include the status of marine mammal stocks, population trends, and threats should be identified for all ESA listed species.
- It was noted that NMFS' biological opinions should not be used as a reference unless referring to specific conclusions for which the particular project that the biological opinion was issued.
- The EIS should consider information in the 2021 draft marine mammal Stock Assessment Reports and the recently updated Duke marine mammal density models. Please also note that the Biologically Important Areas (BIAs) are undergoing changes; finalization of the updated website and database is scheduled for December 2022. The locations, timing, and Importance Scores of the updated and revised BIAs, once this information becomes available, should be considered in the development of the EIS. The project lease area overlaps with a migratory BIA for North Atlantic right whales.
- The EIS should also consider how any proposed wind farm may displace or alter fishing or existing vessel activity that may change the risk to protected species from interactions with fisheries or vessels either within or outside the lease area, including potential risks of interactions with recreational fishing activity around foundations and entanglement in marine debris that may become ensnared on the foundations.
- The EIS should consider effects of any surveys that may occur following potential COP approval that may affect listed species (e.g., gillnet or trawl surveys to characterize fisheries resources), as well as any pre- or post-construction monitoring that may affect listed species and/or critical habitat.
- NMFS suggested that BOEM will develop a Biological Assessment (BA) to support US Wind's eventual request for ESA section 7 consultation. It is anticipated that the description of the proposed action, scientific information and effects analysis in the BA will be consistent with the DEIS. The BA and the NEPA document are likely to evaluate effects of activities consistent with a design envelope and are likely to take a "maximum impact scenario" approach to assessing impacts to listed species that may occur. Early coordination with NMFS is encouraged to determine which impact-producing factors should be analyzed based on a "worst case" or "maximum impact" scenario and which parts of the design envelope would need to be narrowed to carry out a reasonable analysis that would support the request for section 7 consultation.
- NMFS suggested that because activities associated with the construction of the project have the potential to result in the take of marine mammals, US Wind should request an Incidental Take Authorization (ITA) pursuant to section 101(a)(5) of the MMPA. NMFS' proposal to issue an ITA that would allow for the taking of marine mammals, consistent with provisions under the MMPA and incidental to an applicant's lawful activities, is a major federal action under 40 CFR 1508.1(q)16, requiring NEPA review. Rather than prepare a separate NEPA document, NMFS, consistent with the CEQ regulations at 40 CFR 1506.3, intends to adopt BOEM's Final EIS to support its decision to grant or deny US Wind's request for an ITA pursuant to section 101(a)(5)(A) or (D) of the MMPA. NOAA may adopt a NEPA document prepared by another federal agency if the action addressed in the adopted document is substantially the same as that

being considered or proposed by NOAA, and NOAA, after independent review and evaluation, determines the document satisfies 40 CFR 1506.3 and NOAA's implementing NEPA procedures. When NMFS serves as a cooperating agency and intends to adopt another agency's EIS, NMFS ensures all resources under their jurisdiction by law and over which they have special expertise are properly described and the effects sufficiently evaluated, documented, and considered by the lead agency EIS. Of particular importance is that the Draft and Final EIS address comments and incorporate edits NMFS provides during document development and cooperating agency review. As a cooperating agency per 40 CFR 1501.8, NMFS must determine that the Final EIS properly addresses their comments and input in order for NMFS to determine the EIS is suitable and legally defensible for adoption per 40 CFR 1506.3 and NOAA's implementing NEPA procedures, and subsequent issuance of an ITA.

### 2.3.17 Materials and Waste Management

Comments addressed the fate of materials and potential risks of materials/waste spills. Topics raised in this category included the following:

- Commenters were concerned with abandoned or failed Project components being left at the end of life of the Project and suggested that the COP should include a plan and cost estimate for decommissioning and put financial assurances in place via escrow.
  - Impacts if left in place would include impacts to marine life and water pollution.
- Comments noted that the decommissioned carbon composite blades would end up in landfills and take up an extraordinary amount of space.
- Commenters are concerned with oil spills from vessel collisions with wind turbines since there are adjacent shipping lanes and were questioning who is responsible for containing and cleaning up after an accidental oil spill.
- Comments suggested that the oil spill response plan be improved since a total of 508,078 gallons of lubricating and diesel oil is stored offshore. A massive hurricane could threaten a major spill. Commenters questioned if US Wind had insurance or domestic financial means to guarantee clean up and repair to ensure power is restored quickly after a hurricane.
- The EIS should also evaluate the potential impacts of chemical emissions (e.g., sulfur hexafluoride), including the release of chemical residues from wind farm operating materials and corrosion-protection systems.

### 2.3.18 Mitigation and Monitoring

Comments related to mitigation measures to address potential impacts and monitoring of biotic and abiotic conditions. This includes comments on already proposed mitigation and monitoring measures, as well as suggestions for additional mitigation and monitoring strategies for the proposed Project. Topics raised in this category included the following:

- Comments noted that several of the mitigation plans in the COP are undefined and incomplete.
- The Project should avoiding sensitive habitat areas, requiring strong measures to protect wildlife throughout each stage of the development process, and comprehensive monitoring of wildlife and habitat before, during, and after construction, are all essential for the responsible development of offshore wind energy.
- In the EIS, mitigation measures, if included in the impact analysis, should be explicit and stated as required and not optional or if practicable. The EIS should provide information on how mitigation measures are considered in the context of the definition of effects levels (e.g., negligible, minor, moderate, major), and how mitigation would reduce or offset those levels of

effect. The effectiveness of any proposed mitigation should also be evaluated in the NEPA document.

- The EIS should discuss measures to avoid and minimize impacts in detail, including what resources would benefit from such mitigative measures and how/when such benefits (or impact reductions) would occur. The EIS should analyze temporary effects and anticipated recovery times for marine resources within the impacts analysis.
- Comments recommended that compensatory mitigation be proposed to offset unavoidable permanent and temporary impacts. This should include discussion and evaluation of potential compensatory mitigation for unavoidable adverse impacts to fisheries habitats and the lost functions and values resulting from those impacts. Compensatory mitigation for both ecological losses as well as social and economic losses should be discussed in the EIS.
- The EIS should consider and evaluate mitigation necessary to offset negative impacts to longstanding marine scientific survey operations (e.g., loss of access to project areas, changes to sampling design, habitat alterations, and reduced sampling due to increased transit time) and fisheries dependent data collections.
- Comments indicated that the adaptive management plan should account for reasonably foreseeable impacts from other projects.
- Comments recommended several mitigation measures during site assessment and characterization including prohibiting activities during times of high risk for North Atlantic Right whales, require clearance and exclusion zones, shutdowns, monitoring, vessel speed, noise reduction, and reporting.
- Comments suggested that real-time and archival passive acoustic monitoring be used as a secondary detection/monitoring system during construction, operation and maintenance, and decommissioning to increase situational awareness in vessel corridors and around the project area, and during construction, operation and maintenance, and decommissioning to monitor the distribution of marine mammals in the lease area.
- Comments recommended several mitigation measures during pile driving including prohibiting activities during times of high risk for North Atlantic Right whales, restrict to daylight only, restrict pile driving from November 1 to April 30, require clearance and exclusion zones, shutdowns, monitoring, vessel speed, noise reduction, and reporting.
- Comments recommended several mitigation measures during gravity-based foundation installations including requiring clearance and exclusion zones, shutdowns, monitoring, vessel speed, noise reduction, and reporting.
- Commenters noted that painting the tips of the blades a different color can reduce bird collisions.
- Comments suggested using noise reduction technology.
- Comments suggested reducing light pollution.
- The EIS should assume that Aircraft Detection Lighting Systems (ADLS) will not be used since the COP states would only be used if "commercially feasible and thus define the nighttime impact on the viewshed as major.
- The NPS supports use of ADLS (or a similar system) to turn aviation obstruction lights on and off in response to detection of nearby aircraft. In general, NPS recommends the following measures protective of night skies. BOEM can find them discussed further in NPS Best Practices for Sustainable Outdoor Lighting. Sustainable Outdoor Lighting - Night Skies (U.S. National Park Service) (nps.gov).

### 2.3.19 Navigation and Vessel Traffic

Comments regarding impacts to navigation and vessel traffic included proximity of the project to current major shipping lanes, increased potential for allisions, and potential radar interference caused by rotating turbine blades. Topics raised in this category included the following:

- The EIS should include studies concerning the impact to Old Basin Cove and Beach Cove as siltation is already occurring here and the channels are barely navigable.
- Commenters discussed the potential for increased vessel collisions due to the project being near a major shipping channel and questioned the effects on the shipping channel into Philadelphia and Ocean City's recreational and commercial fishing industry.
- Commenters questioned if the project would have a "no sailing zone" around the turbines that may restrict navigation and vessel traffic.
- The EIS should consider allision a potential major impact.
- Commenters discussed pending reviews of COP sections on potential impacts on the military, commercial aviation, radar, and the Coast Guard. The EIS should not be finalized until those reports are complete.
- Commenters expressed concern for potential impacts to marine radar systems as evidenced by the past Block Island project. The EIS should provide mitigation plans to reduce or eliminate radar interference.
- Commenters expressed concerns regarding false radar images created by spinning turbine blades. These false radar images are a hazard to marine traffic and can hinder Coast Guard search and rescue efforts and the detection of hostile aircraft and objects.
- The EIS should include a safety study regarding the shifting of sand bottom and sand bars that may affect navigation.
- Commenters expressed concern that the project area contains multiple lease blocks that fall within the 2- and 5-nm buffer zones defined by the U.S. Coast Guard's Maritime Planning Guidelines (MPG).
- The EIS should consider allotting a 2-nm safety buffer in the western portion of OSC-A 0490 to help protect navigation safety by providing extra transit space.
- BOEM should adhere to the spirit of the Atlantic Coast Port Access Route Study (ACPARS) recommendations and not allow construction in the portions of the proposed US Wind lease area that would overlap with the safety fairway and the 2-nm safety buffer.
- BOEM and the U.S. Coast Guard should engage the towing industry during conduct of a Navigation Safety Risk Assessment on the US Wind lease area.
- Commenters reference a scoping meeting and the discussion of motion sensing equipment that would only utilize the blinking red navigation light (on top of turbine structure) when an aircraft was within a certain range. It was noted that this technology should be researched and provided as an option to aid the aviation industry.
- Commenters referenced a peer-reviewed report from the National Academy of Sciences that considered the hazards of offshore wind turbines to navigational systems, and that no solution to navigational radar interference was determined. With the proximity of the lease area to major shipping lanes, the navigational conflicts and dangers associated with this installation should be analyzed objectively by individuals who are not proponents of the current lease areas to fairly determine whether safety hazards can be avoided an at what cost.
- Commenters noted the project area overlaps with seven NOAA scientific surveys which are necessary to support the assessment, management, and conservation of important marine resources for which NOAA is responsible.

### 2.3.20 NEPA/Public Involvement Process

Comments related to the preparation of the EIS and the NEPA process, including how public stakeholders, state and federal agencies, and tribes will be engaged. Topics raised in this category included the following:

- Commenters indicated that the 30-day comment period is an unrealistic and inadequate duration to review the voluminous COP which includes very technical information. The comment period also occurred over two federal holidays. Suggested 90-days or more be allowed.
- Commenters also noted that many of the technical appendices to the COP were not available online or complete, resulting in lack of transparency and trust. It was also stated that since incomplete, the project should be rejected or deferred.
- When the COP is updated and missing information is provided by US Wind, cooperating agencies should be notified immediately and clearly explain modifications or updates.
- Comments noted that the posters on the virtual meeting page were useful and requested additional topics including commercial and recreational fishing.
- Commenters noted that the regulations.gov did not show or post the comments and felt that it hindered ability to see others' concerns and diminished transparency.
- Commenters expressed a lack of trust in the public involvement process, citing a lack of advertisement for and awareness of public involvement opportunities and that their concerns were not being incorporated into the Project design. Commenters also cited dissatisfaction in the timing of public involvement, stating that involvement should have begun earlier in the process.
- Commenters want to ensure compliance with all policies and permits to ensure development in an environmentally responsible manner and ensure that the EIS use of the best available science and data.
- Comments indicated that this EIS should be consistent in approaches, while adopting lessons learned from one project to the next to benefit stakeholders who engage in the review process for these complex projects. The pace and number of offshore wind projects in development in our region pose challenges for thorough analysis of potential impacts, informed public input, and adopting lessons learned from each project.
- The EIS should include analysis of cumulative impacts and adaptive management strategies, obtaining all necessary and relevant data, and require BOEM to identify all methodologies, and indicate when information is incomplete or unavailable, acknowledge scientific disagreement and data gaps, and evaluate intermediate adverse impacts based on approaches or methods generally accepted in the scientific community.
- The significance criteria definitions should identify the level of impacts from the project (e.g., negligible, minor, moderate, major); the direction (beneficial or negative); and where applicable, the duration of impacts. Importantly, the significance criteria should not embed terms defined by other statutes (e.g., the definition of minor should not refer to the MMPA definition of "level A harassment") or apply other statutory definitions to the impact criteria used for NEPA purposes. Rather, these definitions should be written in a way that it is clear to a reader how these impact determinations consider the spectrum of effects to individual animals (e.g., temporary behavioral disturbance, injury). You should use definitions that are appropriate for the resource being considered (e.g., benthic habitat vs. marine mammals).
- The environmental consequences section of the EIS should consider all of the individual, direct, and indirect effects of the project, including those impacts that may occur offsite as a result of the proposed project, such as construction of landside facilities necessary to construct and support operations of the US Wind project. Impact-producing factors (IPFs) from each phase of development should be considered, including site exploration, construction, operation and maintenance, and decommissioning.
    - For IPF, it is important that the geographic area encompass all relevant project related activities, including the lease area, cable corridors, landing sites, vessel transit routes, and the use of ports outside of the immediate project area. This analysis should also include any necessary landside facilities and the staging locations of materials to be used in construction.

- NMFS recommended the following temporal classifications: (1) short-term (less than 2 years); (2) long-term (2 years to < life of the project); and (3) permanent (life of the project). The time of year that construction activities occur is a crucial factor in evaluating potential biological, economic, and social impacts of the project and should be explicitly considered when evaluating impacts.

### 2.3.21 Noise

Comments addressed noise associated with construction and operation, and additional vessel traffic in the project area. Topics raised in this category included the following:

- The EIS should measure the underwater sound levels of 18-MW turbines and determine a mitigation strategy to meet NOAA level B harassment levels.
- The EIS should assess the frequency and magnitude of noise/vibration emissions resulting from offshore and onshore construction, including the impact of noise on residential homes, tourism, recreation, and sea life. Additionally, the EIS should sufficiently quantify construction and operational noise impacts.
- Commenters expressed concern for the noise and "whine" generated from the turbines and that questions and comments noted during the July 7th presentation were left unanswered in the COP.
- Commenters requested that the turbines not be heard from shore.
- Commenters expressed concerns regarding drilling associated with proposed drilling for equipment installation.
- The EIS should provide noise level data associated with residents living within various distances from the turbines.
- Commenters suggested the use of quieter foundations (e.g., gravity-based, caisson) during offshore wind energy project installation and stressed the importance of providing full consideration, when feasible, to selecting these options as the preferred alternative.
- US Wind should use effective noise reduction and attenuation technologies during pile driving operations and near real-time monitoring technologies that may be used to trigger mitigation measures.
- US Wind should use direct drive turbines as opposed to turbines with a gear box, as direct drive turbines may emit lower noise levels and reduce the risk of behavioral disturbance or habitat displacement of North Atlantic right whales and other species during the operation phase of development.
- Commenters expressed concerns regarding additional shipping and boat traffic associated with construction that will add additional sounds and noise to existing background levels. The EIS should include additional research to fully understand the significance of the multiple sources of sounds that are combined in high use areas such as the Mid Atlantic tracts off Maryland and Delaware.

### 2.3.22 Other

This generalized comment category was used to collect other substantive comments. Specific topics could include (but are not limited to) other forms of renewable energy, wind energy storage, installation vessels, and existing infrastructure.

- A commenter asked if BOEM was considering energy from waves, tides, or currents and recommend that they do some studies to utilize more than just wind.
- A commenter would like to see a domestic wind supply chain that can store the wind energy similarly to solar energy storage.

- A commenter suggested that BOEM could require offshore wind developers to construct vessels incorporating vessel quieting technology since propeller cavitation is the primary source of chronic noise from vessels in the ocean environment.
- A commenter pointed out that there are already many buried telecommunications cables and natural gas pipelines in the area in the bay, along roads, and near homes and suggested BOEM provide a map of existing infrastructure for public awareness.

### 2.3.23 Planned Activities Scenario/Cumulative Impacts

Comments on cumulative impacts suggested that the EIS include the full range of reasonably foreseeable projects, especially all potential offshore wind projects. Cumulative impacts could be severe for many different resources. Topics raised in this category included the following:

- Commenters noted that the COP does not adequately provide the estimated number of vessels or their speeds or the frequency and duration of vessel activity.
- Commenters stated that the EIS should analyze and report the cumulative effects on all affected resources and include adjacent offshore wind Projects, some comments suggested all proposed offshore wind projects on the East Coast be considered in the cumulative analysis.
- The EIS should acknowledge both the individual project's potential to materially affect oceanographic and hydrodynamic conditions based on ongoing research efforts and the project's contribution to cumulative effects from development of several wind projects on a regional scale.
- The cumulative analysis should include a broad view of all reasonably foreseeable activities, including but not limited to, energy infrastructure (including future wind energy projects), sand mining, aquaculture, vessel activity, fisheries management actions, disposal sites, and other development projects.
- The cumulative impacts assessment should include impacts of the Project (turbine scale) and the full build-out/cumulative offshore wind scenario on hydrodynamics, oceanographic, and atmospheric conditions on the marine ecosystem since it could have a significant impact on currents, primary productivity, and stratification, the Cold Pool, and, subsequently, the ecology, habitat, and egg/larvae and prey distribution of a number of federally managed fish species and protected species.
- The COP indicates that an impact minimization measure will be utilizing the best available technologies for cable installation. EPA recommends that the EIS include an overview of how the proposed cable installation technologies for the Offshore and Onshore Export Cable Corridors avoid potential impacts for each component and location.

### 2.3.24 Proposed Action/Project Design Envelope

Comments that addressed the Proposed Action and the Project design envelope included suggestions to consider alternate technologies, account for impacts from all Project components, collaborate with adjacent wind farms, and undergo comprehensive surveys. Topics raised in this category included the following:

- Some commenters expressed concern over the inefficiency and unreliability of wind as a source of power, and concern over power outages due to breakdowns.
- Commenters were concerned about the security measures for the windfarms.
- One comment stated that the geotechnical surveys are inadequate to support the design of the project and the suitability of the design to survive the stressors at the site.
- Commenters are concerned with cables becoming unburied and suggest scour protection on all cables. Once commenter suggested consideration of material types for the protection that would

provide habitat for marine species and also material that reduce interference with mobile fishing gear.
- Commenters suggested that after the project is decommissioned, the seabed should be returned to pre-existing conditions and all material be removed.
- Some commenters suggested that materials for all project components should be designed or selected to mimic natural, nearby habitats when possible.
- The EIS should explain how the wind farm will be secured from intentional harm.
- The EIS should address the technological feasibility of the methods that are proposed to be used.

### 2.3.25 Purpose and Need

Comments on the purpose and need were related to a shift from fossil fuels, potential grid shortfalls, and the need to meet state and federal wind deployment goals. Topics raised in this category included the following:

- Commenters noted that increase in wind generation necessarily means less reliance on fossil fuels and less of the pollution associated with the burning of natural gas and coal.
- Commenters suggested the purpose and need should be tied to realistic renewable energy goals, considering state targets, constraints of the onshore power grid, and other considerations. The purpose and need should also include a specific MW capacity. This is necessary to inform development of alternatives to meet the purpose and need while minimizing negative impacts to the environment and human communities, including impacts to fisheries and fishery species.
- Commenters expressed concerns regarding the nation's current electrical system and that transmission lines must be upgraded and extended.
- Commenters suggested the unreliable and intermittent nature of wind requires a backup source of power be available and ready to come on line as needed, resulting in double the capital expenditure.
- Commenters noted that in the face of growing global demand, sending clear market signals to attract investment to the U.S. is critical to ensuring U.S. offshore wind deployment goals are met. If the U.S. does not develop a robust domestic offshore wind supply chain, surging global demand for offshore wind project components, services, and raw materials could prevent the U.S. from reaching state and federal offshore wind deployment targets.

### 2.3.26 Recreation and Tourism

Comments related to onshore or offshore recreation as well as tourism activity associated with these resources, such as whale watching, boat rentals (except for fishing), onshore sports leagues, or revenue generating tourist facilities, are captured in this section. Topics raised in this category included the following:

- Commenters expressed concern that visible turbines will negatively impact the tourism industry. Specific concerns included an overall loss of visitors, loss of rental income, loss of property value, and general negative economic impacts to coastal/beach areas. Some individuals believe the project will come at the expense of the Ocean City tourism industry. Others cited concerns about tourists not wanting to vacation in a construction zone.
- Commenters cited studies where visible turbines actually increased tourism and had a positive economic impact on the region. These individuals mentioned a positive economic impact and a positive environmental impact. One individual concluded that visible turbines would in fact add to their property value and aesthetic beauty.
- Commenters often expressed concern that properties in Delaware would be adversely impacted for a Maryland project.

- Commenters questioned the aesthetic impact of turbines located 11 miles offshore. Additionally, some individuals were concerned about flashing and/or constant lighting from the turbines at night, thus creating permanent nighttime light pollution.
- Commenters expressed their excitement about the project and how they expected other individuals and tourists to feel the same.
- Commenters expressed gratitude for US Wind's effort in addressing local concerns.
- Commenters were concerned about the heavy construction impacts from a 3R Road landfall would negatively impact nearby residents and users of the State Park facilities.
- Commenters asked for an independent evaluation on the impacts to the economy.
- Others commenters requested that US Wind avoid construction during summer tourism season (Memorial Day through Labor Day) and describe measures to maintain public access throughout the construction phase of the project.
- One commenter explained that beach replenishment projects in the 1980s were originally opposed by Ocean City residents, but today the residents take pride in the project.
- Commenters expressed concern that US Wind's impacts on socioeconomic and cultural resources, including tourism and recreation, be assessed in the EIS with appropriate data and surveys.

### 2.3.27 Scenic and Visual Resources

Comments on scenic and visual resources focus on the detrimental impact the wind farm would have on the landscape and viewing experience. Topics raised in this category included the following:

- Commenters believe the construction and operation of offshore wind turbines will desecrate the oceanic landscape and viewscape. People are concerned that the visual impacts of the turbines will destroy the natural viewshed and decrease property values. There are concerns about the visual impacts on the tourism industry, the negative impacts on the residents who prefer a pristine landscape, and the changing of a pristine beach area into an industrial park.
- Commenters expressed concern that the viewshed would be altered for an infrastructure project with only a 20-year lifespan.
- Commenters are concerned about the increase in turbine height from what was originally proposed in the past, and how the impacts on Ocean City will be more dramatic than people envisioned. People are concerned about the aesthetic of such tall turbines relatively close to shore when the turbines previously proposed were half the height.
- Commenters requested the turbines be placed further offshore (at least 30 miles).
- Commenters suggested that the turbines would be a welcomed addition in an area already impacted by so many human activities. Many stated that the turbines will look much better than oil rigs. One individual mentioned that the maintenance of the viewshed ship sailed long ago, referring to banner airplanes and commercials and shipping freighters.
- Commenters offered strong support for more wind energy off the coast of Maryland, and few mentioned they would be more likely to visit Ocean City if there are turbines on the horizon.
- One commenter suggested that concerned individuals take the ferry across the Delaware Bay and look back at the University of Delaware windmill to get a reference for how far away the turbines will be. The commenter states that from the ferry, without binoculars it is almost impossible to see the windmill. They also compared the visual distance to the radio towers in Cape May, and the Cape May lighthouse.
- Commenters do not believe the wind turbines will negatively impact tourism. One comment suggested that the turbines in Palm Springs, CA have not deterred people from vacationing there, nor had an impact on property values.

- Commenters mentioned that they would much rather have visible turbines than sea level rise from climate change, and that future generations would have to deal with the ocean rising and washing away homes.
- Commenters requested updated studies to address the effects of tourism, the economy, and the environment for both Delaware and Maryland. These individuals stated that the studies referenced in the current plans are outdated and with inaccurate information. One individual mentioned that BOEM does not have a suitable study to determine the cost impacts of viewshed loss.
- One commenter strongly urged the regulatory agencies to understand the economic implications of visible turbines on the tourism industry and cited a North Carolina State study which found that 54% of tourists would not come to the Outer Banks if turbines were visible.
- Commenters are concerned about visual impacts at night with flashing or constant lighting. These comments requested the agency consider the impact of lighting at each turbine.
- Some commenters are concerned that they were misled about the full extent of the turbines' visual impacts. These commenters raised concerns about the accuracy of the visibility figures.
- Commenters are concerned with the lack of opportunity to dissent.
- Commenters believe that the economic value of a pristine viewscape should be seriously considered in the environmental review.
- Comments from the NPS stated that the presence of offshore wind towers or other associated facilities within the ocean viewshed visible from the beaches of Assateague Island would alter existing conditions and likely detract from the desired experience of Park visitors and may harm the values and purpose of the National Seashore. NPS requests that as the US Wind project areas are developed, plans are made to create visual simulations, including static photos, videos, nighttime simulations and time lapse simulations from Assateague Island National Seashore.

### 2.3.28 Sea Turtles

Comments about sea turtles that address biological, structural, or habitat impacts on the species or their habitat included the following:

- Commenters suggested that BOEM use NMFS's most recent pile driving calculator to obtain an accurate injury and behavioral radii for sea turtles during impact and vibratory pile driving.
- Commenters suggested that, as the offshore wind industry advances, studies are needed to determine critical ratios and temporary and permanent threshold shifts so that accurate acoustic threshold limits for anthropogenic sound sources can be added to NMFS's sound exposure guidelines for protected species like sea turtles, and additional monitoring and avoidance, minimization, and mitigation protocols can be developed to minimize impacts to sea turtles during offshore wind development and operation and other anthropogenic activities.
- US Wind should conduct monitoring of sea turtle sensory ecology as soon as possible to advise efforts, and a conservative approach should be adopted in the meantime to guard against impacts to these threatened and endangered species.
- The NPS has documented several successful loggerhead sea turtle nests at Assateague Island NS since 2017.

### 2.3.29 Water Quality

Common topics raised in this category include the following:

- Commenters were concerned the project will likely have an adverse effect on water quality.

### 2.3.30 Wetlands and Waters of the U.S.

Comments on wetlands and waters of the U.S. suggest concern for the wetlands ecosystems and the impacts to marine life, birds, and the current dune system. Topics raised in this category included the following:

- Commenters suggested that the water routing of the submarine cable should be minimized due to the increased environmental impacts of trenching through a wetland versus land.
- Commenters expressed concern with the disturbance of the wetlands associated with the proposed cable landing.
- Commenters expressed concern regarding the running of the high-capacity cables through the adjacent bay and the thriving ecosystem, and effects on the waters and soils of Delaware.
- The EIS should thoroughly evaluate the proposed impacts of each of the six terrestrial Onshore Cable Routes as well as the Onshore Export Cable Corridor 1 option. Information regarding the terrestrial route alternatives should be expanded in the EIS. Potential impacted resources could include forests, rare ecological communities, habitat for species of concern, wetlands and other aquatic resources, ecological cores, and other sensitive resources.
- EPA appreciates the wetland delineation provided for the Indian River substation and associated map, clarification of proposed impacts for each aquatic resource type is necessary to identify potential opportunities to avoid and minimize impacts to Waters of the U.S. and evaluate compensatory mitigation to offset the loss of functions from unavoidable impacts. Aquatic resources on or immediately surrounding the site should be fully characterized in the EIS. At a minimum, National Wetlands Inventory (NWI)-mapped wetlands should be assessed to identity potential impacts from the cable routes and onshore facilities. Streams should also be mapped, and potential permanent and temporary impacts associated with road crossings or construction of outfalls should be assessed.

# Appendix A: Comment Matrix by NEPA Resource Topic

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
|---|---|---|---|---|---|
| BOEM-2022-0025-DRAFT-0002-210 | J L | Individual | None | Air Quality | I live in Baltimore and suffer from asthma. The air quality in the summers is often very poor and a significant portion of the air pollution comes from smoke from coal-fired energy plants. Moving to clean renewable energy will have immediate health benefits to people living in cities like Baltimore. |
| BOEM-2022-0025-DRAFT-0023-244 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Air Quality | US Wind mistakenly claims emissions savings from the project, and emission savings are the core reason to build the project. In the COP Volume 1, page 72, Table 5-6, US Wind claims its project will replace fossil fuel generation and save up to about 126 million metric tons of CO2 , 11 thousand metric tons of PM2.5, 61 thousand metric tons of NOx , and 95 thousand metric tons of SO2 over the 20 year projected life of the project.....<br>However, two different consultants1 used by the Maryland Public Service Commission in dockets approving the projects definitively state the offshore wind projects will simply replace onshore wind projects. In fact, one consultant goes on to calculate emissions will actually be higher for the offshore projects as they are located near the edge of the regional grid while onshore projects would be more centrally located resulting in lower regional transmission losses. The same amount of onshore wind and solar could be built for one-quarter to one-third the cost by the end of 2023 while the COP schedule shows operational dates of 2025 to 2028.<br>My recent study, “No emission reduction from increasing wind and solar”3, shows how the regional PJM grid saw a 30% increase in wind and solar power generation from 2019 to 2021, or 8 million MWhs, about the same amount as US Wind expects to generate. The increase merely replaced zero emission nuclear and hydro power and a small increase in regional electric demand. Falling coal generation was replaced one to one with natural gas because of free market fuel price reductions and would have happened if wind and solar didn’t exist. US Wind needs to redo Tables 5.5 and 5.6. The underlying reason of emission reduction to build the offshore projects doesn’t exist and the project should be denied. |
| BOEM-2022-0025-DRAFT-0046-294 | Victoria Venable | Non-governmental organization | Chesapeake Climate Action Network | Air Quality | While offshore wind is a renewable energy source aiming to reduce greenhouse gas emissions, there are some emissions associated with the production of turbines. However, it is important to note that offshore wind has a reasonable payoff time, meaning it offsets the greenhouse gas emissions that were produced in the production, transportation, and installation of the turbines. This time period is estimated to be about eight to ten months after the beginning of the operation. While this is slightly slower than onshore turbines’ payoff time of six months, offshore wind benefits from long-term turbine life cycle and energy production.7 Most land-based turbines have an estimated 20-year lifetime, however, the offshore wind turbines proposed for this project will likely have a longer lifetime, up to 25 years.8 Because of this longer lifetime, this would displace more emissions than that of an operational onshore wind.9 Additionally, faster wind speeds off the coast and the ability to have larger turbine sizes allow for more energy production than onshore facilities. After pay off, offshore wind will have an emission-free period of about 38 times longer than emissions used during the manufacturing and installation process.10 |
| BOEM-2022-0025-EMAIL-277-916 | Stepan Nevshehirlian | Federal agency | EPA | Air Quality | Air Quality and Permitting<br>The Maryland Department of Environment (MDE) will be the air permitting authority for Maryland Offshore Wind Project, and EPA will review the draft air permit and provide any comments on the draft permit as appropriate. EPA has reviewed Section 5.0 Air Quality and Volume II Appendix C1 Air Quality Emissions Calculations of the submitted COP and offers the following comments.<br>Throughout the COP, including Chapter 5.0, US Wind states that some pollutants (sulfur oxides, lead, greenhouse gasses, non-criteria pollutants, etc.) are negligible or insignificant but neglects to fully develop the project’s Potential to Emit to show evidence for this assumption. Generally, it should not be stated that pollutants are negligible or de minimis until a more refined Potential to Emit based on the project design is developed.<br>US Wind should also avoid using absolute statements such as “the Project will be powered by wind and will produce no emissions during normal operations” (COP Volume II, page 71). Various pollutants may be emitted during normal operations such as Project vessel emissions during maintenance activities, emergency generators on offshore substation platforms, etc. The EIS should clarify emissions associated with the operation phase.<br>Section 5.1.1 of the COP discusses the attainment status of the criteria pollutants. US Wind should be aware that the entire state of Maryland is located in the Ozone Transport Region (OTR) which has a major source threshold of 50 tons/year for Volatile Organic Compounds (VOCs) and 100 tons/year for Nitrogen Oxides (NOx). While US Wind has included NOx potential emissions within the project potential emissions estimates, it has not included VOCs. US Wind should calculate VOC emissions for both construction and operation phases of the project to determine whether the project will be a major source for VOCs. Further, it is recommended that US Wind complete an air emission analysis for all criteria pollutants, their precursors, and total Hazardous Air Pollutants (HAPs) emitted by the project. EPA recommends US Wind add emission estimates for carbon monoxide, lead, particulate matter (PM10), and HAPs to Appendix II’s air emissions analysis, in addition to VOCs.<br>Section 5.2.6 of the COP states that US Wind will implement Best Available Control Technology (BACT) requirements if required by the Prevention of Significant Deterioration (PSD) and Maryland regulations. EPA would like to note that because Maryland is located in the OTR, any air permitting for ozone emissions, including the precursors for ozone of NOx and VOC, would need to be consistent with the Non-attainment New Source Review requirements, and potentially subject to Lowest Achievable Emissions Rate (LAER), not BACT. |
| BOEM-2022-0025-EMAIL-277-917 | Stepan Nevshehirlian | Federal agency | EPA | Air Quality | Section 5.2 of the COP asserts “The WTGs and OSSs themselves are a negligible source of air emissions and will reduce shore-based emissions from existing fossil fuel power plants.” As stated above, unquantified terms like “negligible” should be avoided. Additionally, US Wind should substantiate its assertion that the electricity will displace fossil fuel generation, as it is possible that it may increase overall electrical generation without displacing any existing sources. While Table 5-5 contains a table of Estimate Total Emissions Avoided there is no explanation or demonstration of how the numbers in the table were determined and what underlying assumptions and data were used. US Wind has utilized the BOEM Offshore Wind Energy Facilities Emission Estimating Tool, Version 2.0 (BOEM 2021a) to estimate the potential offshore emissions from the construction and operation of the Project. EPA recommends that US Wind provide further detail regarding the assumptions listed on page 8 of Appendix II C1 of the COP, specifically:<br>•US Wind assumes “vessels are attached to the OCS seabed and are OCS sources 24 hours per day while operating inside the 25 nm radius of the Project.” Please clarify whether US Wind assumes 1) all the vessels are considered OCS sources or 2) just the vessels that attach to the OCS seabed/OCS facility are OCS sources. For vessels that are not OCS sources, US Wind should indicate whether those vessels’ emissions are still counted towards the Project’s overall PTE by US Wind; if they do not, US Wind should provide justification why these emissions should not be accounted for in the Project’s air emissions analysis.<br>•US Wind states “the emission factors and default values for vessels and generators in the BOEM Tool were used without modification.” While this is acceptable, BOEM states that the default vessel profiles in the BOEM Tool are placeholders for more accurate information. Please consider modifying some of the vessel information (i.e., load factors, emission factors) in the BOEM Tool with more accurate and specific vessel information, if available.<br>•US Wind assumes that emissions not calculated by the BOEM Tool (such as HAPs and sulfuric acid mist) and emissions from sources not included in the BOEM Tool are negligible. US Wind is still responsible for providing emission estimates on pollutants and sources that are emitted and exist in the US Wind Project regardless of whether those pollutants/sources are calculated by the BOEM Tool. US Wind should look into other methodologies to calculate Project emissions when the BOEM Tool does not provide an emissions calculation methodology. EPA notes that the BOEM emission estimating tool is acceptable for calculating estimated emissions based on the project design envelope; however, for purposes of the air permit application, US Wind should refine its emissions analyses for all pollutants as the project design is finalized. |
| BOEM-2022-0025-EMAIL-277-918 | Stepan Nevshehirlian | Federal agency | EPA | Air Quality | Construction impacts from onshore activities include air emissions. Section 11.2.1 of Volume II states that releases that would be expected to occur during construction primarily include engine emissions from vehicles and equipment but methods to reduce engine emissions will be implemented during construction of the proposed Project. To demonstrate that air quality impacts associated with construction will be negligible and temporary, these emissions should be estimated, and the discussion should be expanded to specifically identify BMPs that will reduce emissions and parties that will be responsible for implementing the BMPs.<br>With respect to greenhouse gas (GHG) emissions, carbon dioxide (CO2) is the only GHG included in Appendix C1’s air emissions estimate data tables. EPA recommends that US Wind provide emission estimates for other significant GHGs emitted from the project, such as methane (CH4) and nitrous oxide (N2O). US Wind should also indicate whether sulfur hexafluoride (SF6) switchgears will be utilized in the Project on the offshore substations and/or the wind turbine generators and include emission estimates if they are. EPA also recommends that US Wind report the total GHG emission estimate in the form of carbon dioxide equivalents. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-EMAIL-277-919 | Stepan Nevshehirlian | Federal agency | EPA | Air Quality | We recommend that the EIS estimate the overall emissions generated from construction, operation, maintenance, and decommissioning of the project, including onshore, nearshore, and offshore components associated with the proposed project and alternatives. Emissions associated with the Project should be compared with avoided emissions and the climate change benefits provided.<br>We recommend outlining BMPs that will be implemented to reduce GHG emissions during construction and maintenance. Climate-related considerations include the use of GHGs for facilities, selected equipment, fuels, and control technology for construction and operation, as well as avoidance of impacts to forested areas or wetlands that may provide carbon sequestration or storage.<br>EPA recommends that the EIS describe how the offshore and onshore components of the project are designed to be durable in light of the changing oceans, sea level rise, and severe weather events. We recommend that climate change impacts not only be considered for the offshore project components, but also for any land-based activities, including but not limited to sea level rise and increased flooding. |
| BOEM-2022-0025-TRANS-10-28 | Willett Kempton | Non-governmental organization | University of Delaware, Center for Wind Research | Air Quality | So I want to compliment US Wind and their contractor ESS for putting specific numbers on the amount of pollution generated by building and maintaining and decommission, But you really have to kind of dig in and understand the tables and the project and then also the pollution averted by the power production of clean energy which turns off power plants. You can't have too much electricity on the system. So when this comes online, it immediately turns off. Page 71 of the second volume, tables 521-52-2523, that's where it is. And I really encourage BOEM to translate these numbers in a way that are understandable to people like the commenters on the line. |
| BOEM-2022-0025-TRANS-10-29 | Willett Kempton | Non-governmental organization | University of Delaware, Center for Wind Research | Air Quality | And my suggestion to BOEM for the EIS, please take the numbers from the developer and translate them in a way that's understandable to readers so you don't have the next public hearing. Everybody says, why don't you say how much pollution is averted and why don't you draw attention to the deaths averted in addition? So for example, if you look at the CO2 emissions in particular, sometimes you hear people say, well, there's CO2 produced by building the turbines and making the steel and the boats to get out there and all that. Yes. And if you look at US winds table and look very carefully and use the calculator, you can see that that is tabulated and it's 1% of the amount of carbon CO2 displaced by the project. It's literally 100 to one ratio. That should be clearer to the public than it is in there. Now that can be calculated in dollars as well because the White House now has a figure for that which is required to be used in federal projects while this is not a federal project, but it wouldn't hurt for BOEM to actually put that in as well. If you calculate the CO2 in this case, what's the cost? It's quite a bit, it's over the life of the project. Again, subtracting the amount from operations, it's $5 trillion CO2 damage averted. |
| BOEM-2022-0025-TRANS-10-30 | Willett Kempton | Non-governmental organization | University of Delaware, Center for Wind Research | Air Quality | Similarly, you can have a cost and lives premature deaths averted on the criteria pollutants in some different tables. Also in that same section of the COP, where it's per year, it's 30 deaths averted. So Charles Stegman, there's a number for this and it's quite dramatic. So building 1600, sort of lower quantity that it is calculated, it saves 30 lives a year and over the life of the project, 750 lives. So that makes it very clear the environmental benefits of this project. |
| BOEM-2022-0025-DRAFT-0023-251 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Alternatives - Cables and landfalls | The Indian River Bay is classified as a Water of Exceptional Recreational Significance, and a Harvestable Shellfish Water according to the COP. Placing cables in the bay should be viewed as unacceptable instead of the first choice as listed in the COP. |
| BOEM-2022-0025-DRAFT-0036-276 | Bill Rienhoff | Individual | None | Alternatives - Cables and landfalls | I have had a home for 35 years in the North Bethany area and concerned about the location of the proposed substation in the 3 Rs location. There are a number of communities near that where there is potential disruption. Also, the Indian River inlet is nearby and no one knows the exact impact on the inlet. There are numerous sandbars in the area and I would think any kind of excavation could cause harm. At the end of the day, no one knows the impact until the project is complete. Why take a chance when you have the Towers Road beach location with none of what I have described above. Please consider moving the location to Towers Road beach. |
| BOEM-2022-0025-DRAFT-0048-306 | Dan Cohen | Individual | None | Alternatives - Cables and landfalls | The proposed Wind Farm off the coast of Ocean City, Maryland needs major revisions. The proposed cabling as well has left open major questions. Such as the impact on the sea life, some species such as the Horseshoe crab date back to BEFORE the dinosaur age. The Delaware coast near the Indian River inlet is one of two natural breeding grounds in the world for this precious species. Which also plays a big part in medical research. |
| BOEM-2022-0025-DRAFT-0049-309 | Greg Culver | Individual | None | Alternatives - Cables and landfalls | BOEM should require US Wind to bring its high-voltage transmission lines onshore in Maryland, not Delaware. The US Wind project was approved by the Maryland Public Service Commission, and all of the electric power will be received by consumers in Maryland. The economic benefits proposed by US Wind (jobs in Ocean City, MD, installing and maintaining the wind turbines) are explicitly for Maryland. BOEM's scoping meetings for the lease area were, according to BOEM's recent presentation, conducted in Maryland. The noise, economic and possible health impacts of bringing four high-voltage power lines with 1,100 mW of capacity onshore under the Delaware public beach at 3-Rs Road should be considered, and US Wind should find an onshoring location for its Maryland wind project high-voltage transmission lines in Maryland. US Wind moved the onshore location to Delaware when Maryland residents complained. This is a Maryland project and the benefits are in Maryland. |
| BOEM-2022-0025-DRAFT-0056-325 | Mark Newcomer | Individual | None | Alternatives - Cables and landfalls | This is a Maryland project and is used to meet the Maryland clean energy standards. Being a Maryland clean energy project the power from the OSS should come ashore in Maryland and not Delaware. The cable and the rest of the infrastructure for the project should remain in Maryland. I was never afforded the opportunity as a Delaware resident to approve or disapprove this project and now it is effecting me personally with the proposed landing of the cables. The project should come ashore in Md. There are ways to interconnect the grid in Md and then use various methods of interconnection which already exists to get the power to the desired locations such as Indian River substation. In simple terms minimizing cable runs (EMI/RFI) and completing a Md project all in Md needs to be the goal of the project. |
| BOEM-2022-0025-DRAFT-0061-335 | Anonymous Anonymous 8 | Individual | None | Alternatives - Cables and landfalls | I am in favor of offshore wind energy projects, but want to make clear that the 3R location for the vault and wire transition seem reasonable. I AM OPPOSED TO ANY CABLE CORRIDOR THAT GOES THROUGH TOWER SHORES NEIGHBORHOOD OR OTHER EXITING HOUSING NEIGHBORHOODS. |
| BOEM-2022-0025-DRAFT-0077-371 | Seth Hamed | Individual | None | Alternatives - Cables and landfalls | I am 20 year resident of Cotton Patch Hills in North Bethany which is about 1 mile south of 3Rs beach and US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents because BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents.....3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed.<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware; moving the towers out 30 miles if possible would be supported by most.<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore expert cables beneath Indian River Bay and Indian River. |
| BOEM-2022-0025-DRAFT-0089-410 | Pat & Miles Weigold | Individual | None | Alternatives - Cables and landfalls | The noise, beach erosion, public safety, economic and possible health impacts of bringing four high-voltage power lines with 1,100 mW of capacity onshore under the Delaware public beach at 3Rs Road should be considered, and US Wind should find an onshoring location for its Maryland wind project high-voltage transmission lines in Maryland. |
| BOEM-2022-0025-DRAFT-0096-425 | Mike Renshaw | Individual | None | Alternatives - Cables and landfalls | I realize the wind energy situation is here to stay. All I'm asking is that the natural resources being impacted by offshore wind be considered BEFORE these projects are started. For example, the Indian River Coal Fired Power Plant is schedule to close...why has no one suggested running the power cable from the proposed offshore wind turbines to the existing Indian River Power Plant?? The infrastructure already exists there and no state parks or neighborhoods are impacted. I firmly believe you'd get much less pushback with that proposal. Right through the inlet and straight back to the plant. You can ship your power through ALREADY existing means to MD or wherever.<br>Second, can we get some marine and wildlife studies BEFORE we start these projects?? Do we really want to find out we've driven a group of marine life or birds to extinction after billions are spent?.... |
| BOEM-2022-0025-DRAFT-0106-461 | Dennis OBrien | Individual | None | Alternatives - Cables and landfalls | The noise, economic and possible health impacts of bringing four high-voltage power lines with<br>1,100 mW of capacity onshore under the Delaware public beach at 3-Rs Road should be<br>considered, and US Wind should find an onshoring location for its Maryland wind project high-voltage<br>transmission lines in Maryland. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0133-542 | Donna Fisher | Individual | None | Alternatives - Cables and landfalls | There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS. |
| BOEM-2022-0025-DRAFT-0133-543 | Donna Fisher | Individual | None | Alternatives - Cables and landfalls | Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland that have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines are assessed. |
| BOEM-2022-0025-DRAFT-0138-553 | Paul Taltavull | Individual | None | Alternatives - Cables and landfalls | There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS. |
| BOEM-2022-0025-DRAFT-0138-554 | Paul Taltavull | Individual | None | Alternatives - Cables and landfalls | Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland that have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines are assessed. |
| BOEM-2022-0025-DRAFT-0140-560 | Anonymous Anonymous 15 | Individual | None | Alternatives - Cables and landfalls | There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS. |
| BOEM-2022-0025-DRAFT-0140-561 | Anonymous Anonymous 15 | Individual | None | Alternatives - Cables and landfalls | Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland that have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines are assessed. |
| BOEM-2022-0025-DRAFT-0142-567 | Julie Grohovsky | Individual | None | Alternatives - Cables and landfalls | There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS. |
| BOEM-2022-0025-DRAFT-0142-568 | Julie Grohovsky | Individual | None | Alternatives - Cables and landfalls | Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland that have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines are assessed. |
| BOEM-2022-0025-DRAFT-0145-577 | Sandy A | Individual | None | Alternatives - Cables and landfalls | There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS. |
| BOEM-2022-0025-DRAFT-0145-578 | Sandy A | Individual | None | Alternatives - Cables and landfalls | Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland that have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines are assessed. |
| BOEM-2022-0025-DRAFT-0146-585 | Elizabeth Frazee | Non-governmental organization | Tower Shores Beach Association Board of Directors | Alternatives - Cables and landfalls | BOEM should require US Wind to bring its high-voltage transmission lines onshore in Maryland, not Delaware.US Wind moved the onshore location to Delaware when Maryland residents complained. This is a Maryland project, and the benefits are in Maryland; the detriments should not be "offshored" to people in Delaware who were barely, if at all, consulted. |
| BOEM-2022-0025-DRAFT-0152-600 | Harjeet van der Keyl, David van der Keyl | Individual | None | Alternatives - Cables and landfalls | The cables in Indian River Bay should not interfere with boating or wildlife in the bay. |
| BOEM-2022-0025-DRAFT-0160-625 | Susan Weiss | Individual | None | Alternatives - Cables and landfalls | US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that the project will benefit Maryland's residents, Maryland's renewable energy goals, job opportunities for Maryland citizens and the state's air quality without any direct or tangible benefit to Delaware residents, lands or resources.<br>It is inappropriate for Delaware citizens to bear ALL the construction related impacts of locating the onshore export cables at 3Rs and beneath Indian River Bay and Indian River.<br>The transmission cables should make landfall in MD. |
| BOEM-2022-0025-DRAFT-0163-630 | Steve Plotkin | Non-governmental organization | Ocean Hamlet Homeowners Association | Alternatives - Cables and landfalls | BOEM should require US Wind to bring its high-voltage transmission lines onshore in Maryland, not Delaware. Ocean Hamlet is located just over one-third of a mile from 3Rs Road, the location in the Delaware Seashore State Park that US Wind proposes to bring the project's cables onshore. Our Delaware community will be greatly impacted by this onshoring. Yet, the US Wind project was approved by the Maryland Public Service Commission, and all of the electric power will be received by consumers in Maryland. So will the economic benefits. Worse, those of us near 3Rs Road will suffer the noise, beach erosion, public safety, economic and possible health impacts of bringing four high-voltage power lines with 1,100 mW of capacity onshore under the Delaware public beach. US Wind should find an onshoring location for its Maryland wind project high-voltage transmission lines in Maryland. |
| BOEM-2022-0025-DRAFT-0164-633 | Steve Plotkin | Individual | None | Alternatives - Cables and landfalls | BOEM should require US Wind to bring its high-voltage transmission lines onshore in Maryland, not Delaware. Ocean Hamlet is located just over one-third of a mile from 3Rs Road, the location in the Delaware Seashore State Park that US Wind proposes to bring the project's cables onshore. Our Delaware community will be greatly impacted by this onshoring. Yet, the US Wind project was approved by the Maryland Public Service Commission, and all of the electric power will be received by consumers in Maryland. So will the economic benefits. Worse, those of us near 3Rs Road will suffer the noise, beach erosion, public safety, economic and possible health impacts of bringing four high-voltage power lines with 1,100 mW of capacity onshore under the Delaware public beach. US Wind should find an onshoring location for its Maryland wind project high-voltage transmission lines in Maryland. |
| BOEM-2022-0025-DRAFT-0165-646 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Alternatives - Cables and landfalls | Offshore export cable corridors will impact different habitats and different fisheries than the turbines themselves and warrant a thorough analysis. As we have commented to BOEM in the past, export cables and inter-array cables can damage marine habitats, raise concerns about electromagnetic fields (EMF), and pose a risk to fisheries using mobile bottom-tending gear. The amount of cabling placed in the ocean must be minimized.<br>Cables should be buried as much as possible to avoid the concerns listed above regarding external cable armoring materials. We are also concerned about the potential for the cables to become unburied given the dynamic seafloor. Burying the cables as deep as possible will help minimize these risks. For similar reasons, we recommend that, at this stage, all developers plan to remove project components, including cables, from the offshore environment to the extent possible. Abandoned, unmonitored cables could pose a significant safety risk for fisheries that use bottom-tending gear and the long-term risks to marine habitats are unknown. |
| BOEM-2022-0025-DRAFT-0168-656 | Karen Auwaerter | Individual | None | Alternatives - Cables and landfalls | On-shoring in Delaware - The presenters at the July 7th meeting also did not adequately explain why the power is coming<br>on-shore in Delaware, as opposed to Maryland. There were vague allusions to Maryland's infrastructure not being able to handle the energy. However, questions as to whether Maryland should improve its infrastructure, if needed, to accommodate Maryland wind farms were unanswered. In addition, news articles indicate that at least some of the reason for the on-shoring in Delaware is resistance to the on-shoring in Ocean City due to environment, health, and aesthetic concerns. Why should Delaware citizens, who have the same concerns, bear the brunt of this on-shoring for Maryland power while Maryland citizens refuse this burden? |
| BOEM-2022-0025-DRAFT-0170-661 | Lou Manzo | Individual | None | Alternatives - Cables and landfalls | On-shoring in Delaware - The presenters at the July 7th meeting also did not adequately explain why the power is coming<br>on-shore in Delaware, as opposed to Maryland. There were vague allusions to Maryland's infrastructure not being able to handle the energy. However, questions as to whether Maryland should improve its infrastructure, if needed, to accommodate Maryland wind farms were unanswered. In addition, news articles indicate that at least some of the reason for the on-shoring in Delaware is resistance to the on-shoring in Ocean City due to environment, health, and aesthetic concerns. Why should Delaware citizens, who have the same concerns, bear the brunt of this on-shoring for Maryland power while Maryland citizens refuse this burden? |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0179-685 | Kathleen Campanella | Individual | None | Alternatives - Cables and landfalls | On-shoring in Delaware: The presenters at the July 7th meeting also did not adequately explain why the power is coming on-shore in Delaware, as opposed to Maryland. There were vague suggestions that Maryland's infrastructure is not being able to handle the energy. However, questions as to whether Maryland should improve its infrastructure if needed to accommodate Maryland wind farms were unanswered. In addition, news articles indicate that at least some of the reason for the on-shoring in Delaware is resistance to the onshoring in Ocean City due to environment, health, and aesthetic concerns. Why should Delaware citizens, who have the same concerns, bear the brunt of this on-shoring for Maryland power while Maryland citizens refuse this burden? |
| BOEM-2022-0025-DRAFT-0182-693 | William Truitt | Non-governmental organization | Cotton Patch Hills Association, Inc. | Alternatives - Cables and landfalls | THE PROPOSED 3 R'S ROAD LANDFALL. IS A POOR ALTERNATIVE AND THE COP SHOULD BE WITHDRAWN AND REWRITTEN WITH OTHER LAND-BASED EXPORT CABLE ROUTING OPTIONS IN MARYLAND The COP does not evaluate any export cable routes in Maryland. When questioned about this at the public hearing, a BOEM official stated that the export cables needed to connect to a 230 kilovolt (Nk\t") substation and the only such substations available were in Delaware. This overly simplistic response ignores what appear to be multiple 230 kV substations and transmission lines in Maryland due west of US Wind's offshore windfarrn. See Attachment B. |
| BOEM-2022-0025-DRAFT-0184-706 | Jennifer Holmes | State agency | Delaware Department of Natural Resources and Environmental Control | Alternatives - Cables and landfalls | DNREC recommends that BOEM's EIS provide a detailed evaluation of alternatives analyses for export cable corridors, including:<br>• Evaluation of different alignments to the potential cable corridors to minimize the area that cables would occupy within existing vessel traffic routes and the Coast Guard's proposed Cape Charles to Delaware Bay Fairway, minimize impacts to wetlands and benthic resources, and incorporate industry best practices, such as crossing perpendicular to prevailing vessel traffic;<br>• Evaluation of deeper cable burial depths when crossing existing vessel traffic routes to minimize risks to the cable from a dropped anchor or other economic losses from interactions with export cables;<br>• Potential for fewer impacts associated with high voltage direct current (HVDC) versus alternating current (HVAC) cable technology; and<br>• Evaluation of infrastructure that would provide the means necessary for a shared transmission system to minimize the number of export cables required offshore, the number of beach landings, and other inland impacts. |
| BOEM-2022-0025-DRAFT-0186-709 | Sarah Albertson | Individual | None | Alternatives - Cables and landfalls | On-shoring in Delaware - The presenters at the July 7th meeting also did not adequately explain why the power is coming<br>on-shore in Delaware, as opposed to Maryland. There were vague allusions to Maryland's infrastructure not being able to handle the energy. However, questions as to whether Maryland should improve its infrastructure, if needed, to accommodate Maryland wind farms were unanswered. In addition, news articles indicate that at least some of the reason for the on-shoring in Delaware is resistance to the on-shoring in Ocean City due to environment, health, and aesthetic concerns. Why should Delaware citizens, who have the same concerns, bear the brunt of this on-shoring for Maryland power while Maryland citizens refuse this burden? |
| BOEM-2022-0025-DRAFT-0187-714 | John Donofrio | Individual | None | Alternatives - Cables and landfalls | On-shoring in Delaware: The presenters at the July 7th meeting also did not adequately explain why the power is coming on-shore in Delaware, as opposed to Maryland. There were vague suggestions that Maryland's infrastructure is not being able to handle the energy. However, questions as to whether Maryland should improve its infrastructure if needed to accommodate Maryland wind farms were unanswered. In addition, news articles indicate that at least some of the reason for the on-shoring in Delaware is resistance to the onshoring in Ocean City due to environment, health, and aesthetic concerns. Why should Delaware citizens, who have the same concerns, bear the brunt of this on-shoring for Maryland power while Maryland citizens refuse this burden? |
| BOEM-2022-0025-DRAFT-0192-729 | David Dempsey | Individual | None | Alternatives - Cables and landfalls | On-shoring in Delaware. Nor did U.S. Wind or Ørsted explain the best approach for landfall for the project, or how new substations (which are unsightly, loud, and don't make good neighbors) and transmission lines might impact the coastal community. |
| BOEM-2022-0025-DRAFT-0201-753 | Sara Miles | Individual | None | Alternatives - Cables and landfalls | 2.BOEM should require US Wind to bring its high-voltage transmission lines onshore in Maryland, not Delaware. The US Wind project was approved by the Maryland Public Service Commission, and all of the electric power will be received by consumers in Maryland. The economic benefits proposed by US Wind (jobs in Ocean City, MD, installing and maintaining the wind turbines) are explicitly for Maryland. BOEM's scoping meetings for the lease area were, according to BOEM's recent presentation, conducted in Maryland. The noise, economic, beach erosion, and possible health impacts of bringing four high-voltage power lines with 1,100 mW of capacity onshore under the Delaware public beach at 3-Rs Road — and within a third of a mile of our housing development — should be considered, and US Wind should find an onshoring location for its Maryland wind project high-voltage transmission lines in Maryland. US Wind moved the onshore location to Delaware when Maryland residents complained. This is a Maryland project and the benefits are in Maryland; the detriments should not be "offshored" to people in Delaware who were barely, if at all, consulted. |
| BOEM-2022-0025-DRAFT-0205-783 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Alternatives - Cables and landfalls | it is not possible to determine whether the alternative terrestrial cable corridors would have significantly lower impacts to these species as the COP only discusses potential impacts from the single preferred onshore cable route and does not provide analysis of the other six routes. Given the opportunity to colocate onshore cable corridors with existing development and reduce potential impacts to the Indian River Bay and the broader Inland Bays watershed, we urge BOEM to analyze the alternative terrestrial cable corridor routes as distinct alternatives in the draft EIS. This analysis is important to enable the selection of a lower conflict onshore corridor route. |
| BOEM-2022-0025-DRAFT-0205-784 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Alternatives - Cables and landfalls | The COP's lack of analysis for the actual proposed routes and their intention to share their surveys with BOEM only prior to final authorization makes it difficult if not impossible for the public to provide effective comments on the COP and the analyses provided by US Wind. BOEM must ensure the DEIS allows for a meaningful discussion of alternatives. |
| BOEM-2022-0025-EMAIL-275-844 | Michael Pentony | Federal agency | NMFS | Alternatives - Cables and landfalls | As noted above we are concerned about potential impacts of the proposed export cable route on sensitive and vulnerable habitats within Indian River Bay, and we strongly recommend that BOEM consider additional export cable route alternatives. BOEM should coordinate early with the applicant to develop one or more feasible alternatives that: (1) Includes a land-based alternative to avoid crossing Indian River Bay; and (2) avoids and minimizes impacts to sensitive and vulnerable habitats (e.g., rocky habitats and sand ridge complexes) within the lease area and offshore export cable corridor....Once we have the opportunity to comprehensively review the habitat data, we will work with you to identify the sensitive habitats within the lease area that should be the focus of the habitat impact minimization alternative. |
| BOEM-2022-0025-EMAIL-275-849 | Michael Pentony | Federal agency | NMFS | Alternatives - Cables and landfalls | As proposed, the inshore export cable corridor, Onshore Export Cable Corridor 1, would cross Indian River Bay. Given the location of the proposed inshore cable corridor within sensitive and vulnerable habitats and life history stages in and near the project area, it would be reasonable to evaluate ways to avoid and minimize impacts to sensitive habitats along both the offshore and inshore cable routes. This is an accepted practice for cables and other utilities projects and should be a component of the evaluation of impacts from offshore wind development. The alternative should evaluate land-based routes, and modifications or expansions of the cable corridors to ensure cables can be routed around complex and sensitive habitats or using existing utility corridors/easements. For actions such as this that will require authorization from the US Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act (CWA), there is a requirement for the USACE to conduct and analysis to ensure that the proposed action complies with the CWA Section 404 (b) (1) Guidelines (Guidelines) outline a sequence to be followed when evaluating permit applications. It must first be demonstrated that potential impacts have been avoided and minimized to the maximum extent. The Guidelines allow permit issuance for only the least environmentally damaging practicable alternative. For non-water dependent activities, such as utility lines, there is a presumption in the CWA that alternatives exist that do not involve special aquatic sites, and that these alternatives would have less impact on the aquatic environment. Additional cable route options, such as US Wind's proposed cable corridor routes 1a-1c, 2, 3, and 4, should also consider methods used to lay the cable within, or adjacent to, complex habitats for both the offshore and inshore landing locations, as well as avoiding, reducing, and modifying scour protection. Options for avoiding and minimizing impacts related to the methods of construction and routes, that allow for full cable burial to minimize permanent habitat impacts and potential interactions with fishing gear, should be also considered. This is a reasonable alternative that should be considered in the NEPA document as an individual alternative that may be mixed or matched with other alternatives. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-EMAIL-277-905 | Stepan Nevshehirlian | Federal agency | EPA | Alternatives - Cables and landfalls | In particular, EPA recommends thorough evaluation of alternatives that avoid potential impacts to Indian River Bay. Indian River Bay, along with Little Assawoman Bay and Rehoboth Bay, are designated an estuary of national significance, the Delaware Inland Bays. As described by the Delaware Center for the Inland Bays, these bays are especially sensitive to environmental changes as they are shallow and poorly flushed by tidal movement. Terrestrial alternatives that avoid potential impacts to Indian River Bay should be thoroughly evaluated in accordance with the Clean Water Act (CWA) Section 404, which requires selection of the least environmentally damaging practicable alternative. |
| BOEM-2022-0025-TRANS-12-40 | Anna Fagan | Non-governmental organization | Delaware Center for the Inland Bays | Alternatives - Cables and landfalls | Wind in their presentation, there are multiple potential transmission cable routes to an existing electrical substation of sufficient capacity. These include land based routes and routes to the bays to the Indian River Generating Station. The potential environmental impacts of the cables are associated with both their installation and maintenance and their ongoing operation. The center supports maximum avoidance of impact to the inland bays and thus prefers a land based route for transmission cables. The center strongly encourages BOEM to consider the cumulative impacts of pollution and habitat loss with any proposed impacts from current and potential future proposed cable routes. The impacts of the cables, if properly installed, should be small to the overall benthic ecosystem, but more information is needed to fully understand the impacts on certain fish and shellfish. Impacts of concern are for rays and sharks that may be susceptible to electromagnetic radiation from the cables, and concerns about the impacts of offshore wind development on horseshoe crabs should also be seriously considered. |
| BOEM-2022-0025-TRANS-32-113 | William Truitt | Individual | None | Alternatives - Cables and landfalls | I'm commenting tonight on behalf of a group of homeowners in the close proximity to 3 Hours Road, which is the favored landfall for the Onshore Cable area, and the group is known as Safe Beach Cove. It's widely recognized that the Scoping process, which is the subject of tonight's hearing, is a critical part of the overall NEPA process that was described for us by some of the BOEM folks who spoke earlier. And that is because the preparation of the Environmental Impact Statement which will follow this process needs to include information provided by locally impacted residents, including alternatives that may not have yet been identified by the experts at BOEM who don't live in the area. The Construction and Operation plan that's been discussed tonight and presented briefly on a few slides known as the COP was publicly announced and made available to the public in a Federal Register notice published on July 8 with a comment period ending only 30 days later on June 8, that was published with a comment period ending on July 830 days later. |
| BOEM-2022-0025-DRAFT-0136-551 | Sarah Giltz | Non-governmental organization | Oceana | Alternatives - Other comments on alternatives | This comment letter includes the following key points :Oceana is supportive of the Biden Administration's focus on development of offshore wind in U.S. waters as part of an effective and responsible response to the climate crisis; A full environmental review must use best scientific information available, including the Endangered Species Act and Marine Mammal Protection Act, Magnuson-Stevens Act to address each statute; and the EIS should contain a full range of alternatives including sufficient avoidance, minimization, and mitigation of adverse impacts. Alternatives should include the following concepts: Vessel traffic associated with the Wind Energy Area (WEA); monitoring; transparency and reporting; areas to be avoided in siting; right whale important areas; essential fish habitat, habitat area of particular concern, and deep-sea coral areas; site characterization; construction; gravity-based foundations; pile driving; clearance zones for all pile driving, including vibratory; shutdown requirements; noise reduction; and decommissioning. |
| BOEM-2022-0025-DRAFT-0165-637 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Alternatives - Other comments on alternatives | The COP suggests that the full lease area could generate up to 2,000 MW, which suggests that 889 MW, or about 44% of the potential full capacity of the lease, has not yet been procured or planned for. The distinction between the multiple projects within the lease area (i.e., MarWin, Momentum Wind, and additional future projects) should be clarified in the EIS and should inform development of alternatives to be analyzed....The EIS should analyze alternatives that minimize negative impacts to fisheries, fishery species, and marine habitats. Negative impacts could be minimized by reducing the number of turbines and substations installed; using the shortest offshore cable corridor possible; maximizing cable burial depths; seasonal restrictions on construction activities; and excluding turbine, substation, and cable locations with the greatest overlap with fishing activity and sensitive habitats. These alternatives should include details on which locations may be removed, which other modifications are likely, and how these determinations were made.<br>For all alternatives, the EIS should be clear on which measures to avoid, minimize, or mitigate negative impacts will be required as opposed to discretionary. Only required measures should influence the impacts conclusions in the EIS. Monitoring studies should be described in the EIS and in the COP but should not be considered environmental protection measures as monitoring is not equivalent to mitigation. Avoidance, minimization, mitigation, and compensation for negative impacts should all be considered, with compensation thoroughly planned for and used if avoidance, minimization, or mitigation are not possible or are not achieved. Avoidance should be the first priority. |
| BOEM-2022-0025-DRAFT-0205-780 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Alternatives - Other comments on alternatives | The alternatives analysis is "the linchpin of the entire impact statement," and it is "absolutely essential to the NEPA process that the decisionmaker be provided with a detailed and careful analysis of the relative environmental merits and demerits of the proposed action and possible alternatives."14 BOEM must carefully consider a full range of alternatives to the Project, including all necessary mitigation and monitoring of environmental impacts. |
| BOEM-2022-0025-DRAFT-0205-781 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Alternatives - Other comments on alternatives | US Wind has indicated its preference for several technological choices, turbine layout, and cable corridor preferences throughout the COP. For example, as we expand upon below, US Wind has chosen to pursue monopile foundations for WTGs,15 and prefers to route its onshore export cables through Indian River Bay over terrestrial options.16 Despite these stated preferences, we urge BOEM to conduct an alternatives analysis that considers both their preferred choices as well as other alternatives that may offer different degrees of impact. To allow BOEM to conduct a sufficient NEPA review of the project, US Wind's COP must provide enough specifics on each possible configuration covered by the proposed envelope to enable evaluation of impacts on affected species and to fully evaluate the proposal. For example, it is insufficient that the COP simply identifies the types of vessels that may be used,17 because the frequency and duration of vessel traffic is also critical to evaluating collision-related impacts to marine mammals and other species. Additionally, to encompass the full range of reasonably foreseeable impacts, BOEM's analysis must include an alternative that combines the most disruptive components for each option included in the envelope. The design envelope alternative also cannot be conceived or analyzed so broadly that it impairs BOEM's duty to effectively "inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts," as NEPA requires.18 |
| BOEM-2022-0025-EMAIL-275-843 | Michael Pentony | Federal agency | NMFS | Alternatives - Other comments on alternatives | Recommended Alternatives for Consideration in the EIS<br>The "Alternatives" section of the EIS should consider and evaluate the full range of reasonable alternatives to the proposed action, including a no action alternative, as well as those action alternatives that would avoid or minimize damage to the environment. Our two primary concerns as reflected in previous comments are: (1) That the range of reasonable alternatives include one or more alternatives to avoid and minimize adverse impacts to NOAA trust resources; and (2) that the effects of the "no action" alternative be more narrowly focused in scope to exclude the effects of reasonably foreseeable future actions (e.g., planned OSW projects) as those effects can be properly evaluated in the separate and distinct cumulative effects analysis. |
| BOEM-2022-0025-EMAIL-275-846 | Michael Pentony | Federal agency | NMFS | Alternatives - Other comments on alternatives | Consistent with our comments on NEPA documents for previous projects, such as Ocean Wind, it is imperative that BOEM include a no action alternative that allows for a sharp comparison of impacts of the action alternatives when compared to the no action alternative. Additionally, the effects of the no action alternative should not include the effects of reasonably foreseeable future lease build outs - which are better suited for consideration in the cumulative impacts analysis. |
| BOEM-2022-0025-EMAIL-275-847 | Michael Pentony | Federal agency | NMFS | Alternatives - Other comments on alternatives | Similar to the structure of the draft COP, and to facilitate efficient review of the alternatives, we recommend the EIS discussion of the alternatives and comprehensive analyses associated with each be grouped into the three corresponding elements of the proposed project: (1) wind farm area; (2) offshore export cable routes and associated corridors; and (3) inshore/landside export cable routes and associated corridors and landfall points. The proposed project should have multiple alternatives for each element that could be "mixed and matched" in the final selection of the single and complete project. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-EMAIL-275-848 | Michael Pentony | Federal agency | NMFS | Alternatives - Other comments on alternatives | Fisheries Habitat Impact Minimization Alternative<br>The proposed US Wind project is located offshore to the south of Delaware Bay within the Mid-Atlantic Bight, in an area characterized by NE-SW oriented sand ridges and various crests, slopes, depressions and flats. The proposed project overlaps with estuarine, nearshore, and offshore habitats. It is expected that the project area supports sensitive and vulnerable habitats, including sand ridge complexes, natural hard bottom complex substrates (particularly those with macroalgae and/or epifauna), SAV, dense faunal beds (e.g., cerianthid beds), and shellfish habitat and reefs, other biogenic reefs, prominent benthic features, coastal marshes, subtidal and intertidal flats (e.g., mudflats), and designated HAPC. The inshore export cable is proposed to cross the Indian River complex. In recognition of its ecological importance, EPA has designated the Delaware Inland Bays, which includes the Indian River Bay and its tributaries, as one of only 28 estuaries of national significance. In the offshore area, previously collected data and preliminary data described in the COP indicate that the lease area is primarily composed of sands and muds, with bands of complex habitats (i.e. gravels and cobbles). For this project we recommend the fisheries habitat impact minimization alternative focus on two separate issues. One, an alternative route to the proposed crossing of Indian River Bay, and two, avoidance and minimization of impacts to sensitive and vulnerable habitats throughout the entire project area. This may be accomplished through the inclusion of a single fisheries habitat impact minimization alternative, or through the inclusion of two separate alternatives. |
| BOEM-2022-0025-EMAIL-275-850 | Michael Pentony | Federal agency | NMFS | Alternatives - Other comments on alternatives | Lease area and export cable corridor alternative: While the minimization of impacts should be considered in the development of all alternatives, it will be essential for you to consider a discrete alternative that reduces impacts to fish habitats that are more sensitive and vulnerable to impacts within the lease area, such as nearshore areas, prominent benthic features (e.g., sand ridges and banks; ridge and swale complexes), natural rocky habitats, and nearshore areas while also avoiding and minimizing the elimination of natural soft bottom habitats.<br>Minimizing impacts through project design and identification of a habitat minimization alternative must begin with high-resolution habitat mapping and analysis, which will determine the project activities, turbines, and cables that are proposed in sensitive habitat areas and should be considered for removal or modification.<br>Further, this alternative should consider the material and composition of any proposed scour protection, for both cables and turbines, as well as the necessary spatial extent of such scour protection. The analysis should consider how different types of materials employed (e.g., size, shape) may affect the habitat value for early life stages (e.g., juveniles) of species, such as clearnose skate and summer flounder. Additionally, modifications and mitigation measures such as tumbling masonry or quarry stone to eliminate rough edges and angles, layering stone so that smaller stones - such as pebble and cobble-sized stones - are present on the surface for use by larvae and juveniles, should be analyzed.<br>In addition to the Indian River Bay alternative, a full range of reasonable alternatives to the proposed offshore and nearshore export cable corridor should be considered and evaluated, including an alternative to avoid and minimize impacts to important, sensitive, and complex habitats located within the project area. BOEM should consider an alternative that evaluates how cable installation and operation may impact these habitats and sensitive life-history stages of managed fish species and their prey, and identify ways to avoid and minimize impacts to these resources. |
| BOEM-2022-0025-TRANS-12-39 | Anna Fagan | Non-governmental organization | Delaware Center for the Inland Bays | Alternatives - Other comments on alternatives | The center does recognize that offshore wind development is not without environmental impacts and that there are trade offs among energy choices. Overall climate change and a fossil fuel based economy are much bigger threats to the inland bays and the total environment than offshore wind development. However, concerns about these impacts should be taken seriously, and thorough research on the environmental impacts of offshore wind and measures to maximize avoidance and mitigation of these impacts while rapidly achieving greenhouse gas reduction is absolutely necessary, as stated by US. |
| BOEM-2022-0025-TRANS-15-53 | Charlie Garlow | Individual | None | Alternatives - Other comments on alternatives | As I understand it, this opportunity is for a chance for people to speak about reasonable alternatives. While I could just go on talking about all the wonderful things about US Wind proposal, I do have one reasonable alternative to suggest, and that is, although I appreciate the fact that US Wind is suggesting driving monopile foundations into the seabed using curtains of bubbles around it to help absorb the pounding, which may be harmful to whales and other marine mammals.<br>It occurs to me that a screwdriven foundation would obviate all the noise that might come from hammering. I'm an amateur carpenter and I know that as many others might, that if you pound a nail into a two by four timber and it goes into another to try to hold them together, that the nail can be easily pulled out as subjected to lateral pressures or other disturbances, whereas screws hold much better than nails do. |
| BOEM-2022-0025-TRANS-18-60 | Bill Peel | Non-governmental organization | Calver Citizens for a Healthy Community | Alternatives - Other comments on alternatives | We also know that energy is very important throughout the world. We see a very terrible war occurring between Russia and Ukraine, and at the heart of it is this energy issue. The US and at the heart of it is this energy issue. The US needs to become energy independent so that we are not held hostage by influences around the world. And we need to show our leadership in this area so that other countries around the world can see this can be done. It can be done. And many of the problems the other parts of the world are encountering these days can be solved through this process. |
| BOEM-2022-0025-TRANS-18-61 | Bill Peel | Non-governmental organization | Calver Citizens for a Healthy Community | Alternatives - Other comments on alternatives | The fossil fuel industry even admits that the availability of fossil fuels going into the future is not going to be there. That by 2080 we may be seeing the last of fossil fuels. The problem comes is in this midterm that we're going through. More and more wars around the world are going to happen because of the fact that so many countries dependent on fossil fuels will be fighting for the last drop of that fossil fuel and only exacerbating the issue of climate change and its impact on the world. Becoming energy independent will help stabilize our economy, will produce jobs, good paying jobs, going into the future far beyond what any of us are going to live. Our duration or our trajectory won't go into those years far out where future generations hopefully will look back at us and say thank you that we did the necessary things, the hard things that needed to be done to promote a healthy environment that they will inherit. We're seeing the worst or some of the worst of what's happening now, but the scientists all know that it's going to only get much worse, that we need to be very proactive in this. And I do think that the wind project needs to even think bigger, moving forward. |
| BOEM-2022-0025-TRANS-19-64 | Mark Ramsay, P. E. | Individual | None | Alternatives - Other comments on alternatives | Consider the cost and environmental impact of building that many offshore wind farms. Number of farms would still be great, would still be great even if they would output an average over 50% of their name plate capacity. And you still need fossil fuel power, which can provide highly dispatchable power when the wind dies down. Wind farms are not dispatchable, and you need dispatchability for a stable electrical grid. Maryland legislators think that the percentage of renewable energy in power generation is important. It would be if Maryland had its own atmosphere. But it doesn't. |
| BOEM-2022-0025-TRANS-19-65 | Mark Ramsay, P. E. | Individual | None | Alternatives - Other comments on alternatives | Reset renewable power is a misleading electric worthwhile goal is to keep atmospheric CO2 concentration beyond some upper two years after this wind farm is to start up, a commercially sized hydrogen fusion reactor will be starting up in Massachusetts. And a physicist from that company or such reactors will start by 2035. Fusion power is a lot less environmentally invasive use of waterfall fuel and produce. They use water for fuel and produce no radioactive material or rays. We should encourage this technology and build a fleet of these reactors.<br>This will curtail power plants for coal and natural gas and save these resources for future generations. You may ask, do we have the time to wait ten years or so? Eminent physicists have found that the answer is yes. |
| BOEM-2022-0025-TRANS-36-129 | Dave Arndt | Individual | None | Alternatives - Other comments on alternatives | Bird deaths from the wind turbines are small when compared to the other human caused sources of aviation, of mortality. Bird deaths from the wind turbines are small when compared to the other human caused sources of aviation, of mortality. For example, 5 billion birds killed annually as a result of encounter with hazardous ranging from domestic cats to building glass. Finally, it is now accepted that the greatest threat to birds today is climate change due to the change in habits. So having wind farms will allow us to preserve these habits for the birds, thus saving a lot of the bird population. |
| BOEM-2022-0025-DRAFT-0023-246 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Alternatives - Project relocation | Maryland shifts costs to, and interferes with interstate tourism in Delaware in violation of Interstate Commerce provisions of the US Constitution….<br>The projects are visible from Delaware coastal towns that rely on out-of-state tourists for their $3 billion a year tourism economy. Numerous studies discussed above provide evidence fewer tourists may come if wind turbines are visible. BOEM is prepared to offer new lease areas as soon as the fourth quarter of this year further off the Delaware and Maryland coast that would provide sites where turbines would not be visible from the Delaware coast. Maryland, and this COP have ignored these alternative sites.<br>US Wind needs to revise the COP to bring power ashore in Maryland, and needs to consider alternate lease areas further from shore to protect Delaware beach tourism. |
| BOEM-2022-0025-DRAFT-0043-288 | David Winstead | Individual | None | Alternatives - Project relocation | The entry point of any cables should be on public lands north of the Indian River inlet. In addition the wind turbines should be far enough out in federal waters to eliminate their visual siting from the shore line. |
| BOEM-2022-0025-DRAFT-0047-300 | Rose Mary Hoy | Individual | None | Alternatives - Project relocation | If these wind farms are to be built, MOVE THE LEASE AREAS FURTHER OFF SHORE AWAY FROM MIGRATORY PATHWAYS AND FISHING GROUNDS AND FAR ENOUGH AWAY TO NOT BE VISIBLE FROM SHORE. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0048-307 | Dan Cohen | Individual | None | Alternatives - Project relocation | The original proposal for the Wind Farm has a limited height, but that has changed. At 13-miles out, the wind farm will be clearly visible from the shore line. Threatening the beach environment. A major source of tourist revenue for the state of Delaware. We would like the plan to be redesigned to put the wind farm 30-miles off the coast as was done with other projects on the east coast. |
| BOEM-2022-0025-DRAFT-0049-308 | Greg Culver | Individual | None | Alternatives - Project relocation | BOEM should require US Wind to move its wind turbines at least 30 miles offshore, or limit the height of its turbines, in order to ensure that the wind turbines are not visible from the shore. When the lease area was first proposed, the height of the wind turbines was estimated to be 300-400' |
| BOEM-2022-0025-DRAFT-0050-311 | Vivian Jennings | Individual | None | Alternatives - Project relocation | I demand that no cable landfall be allowed to connect any project closer than 30 miles offshore. |
| BOEM-2022-0025-DRAFT-0051-312 | Anonymous Anonymous 4 | Individual | None | Alternatives - Project relocation | The windmills must be pushed back further away from the shoreline for environmental protection. As currently designed there are negative impacts on bird and aquatic wildlife, environmental impact, visibility from shoreline especially at night when the lights are on. Do what is right. Move them back. Also why are there no pictures from Fenwick Island view? Where is the transparency on this? |
| BOEM-2022-0025-DRAFT-0052-313 | Megan Staczek | Individual | None | Alternatives - Project relocation | If these wind farms are to be built, MOVE THE LEASE AREAS FURTHER OFF SHORE AWAY FROM MIGRATORY PATHWAYS AND FISHING GROUNDS AND FAR ENOUGH AWAY TO NOT BE VISIBLE FROM SHORE. |
| BOEM-2022-0025-DRAFT-0058-329 | albert sweeney | Individual | None | Alternatives - Project relocation | There are many other areas in Maryland that are closer to the wind farm and do not impact critical areas but the State has only considered 2 possible landing sites |
| BOEM-2022-0025-DRAFT-0059-333 | Colleen Wilson | Individual | None | Alternatives - Project relocation | We have requested that windfarms be constructed no closer than 30 miles from our shore. This has been done in other areas and can be done off the coast of Maryland and Delaware. |
| BOEM-2022-0025-DRAFT-0066-340 | Calhoun Bond | Non-governmental organization | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0067-345 | Janet Webb | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0068-350 | Kimberly Beals | Individual | None | Alternatives - Project relocation | We urge BOEM to reject or defer US Wind's proposal until each of these items is addressed, as set forth below.1.BOEM should require US Wind to move its wind turbines at least 30 miles offshore, or limit the height of its turbines, in order to ensure that the wind turbines are not visible from the shore. 2.BOEM should require US Wind to bring its high-voltage transmission lines onshore in Maryland, not Delaware. |
| BOEM-2022-0025-DRAFT-0071-355 | Senator Mary Beth Carozza | State agency | Maryland State Senator District 38 | Alternatives - Project relocation | I understand that the Bureau of Ocean Energy Management (BOEM) will review all significant issues in its environmental review of us wind's proposed offshore wind project which includes turbines to be as close as 11 miles from ocean city's beach according to us wind's own future development plans. These updated proposals highlight a significant increase in the number and size of the turbines constructed off ocean city to now a proposed installation of 114 turbines and almost 1,000 feet. This is taller than what was originally proposed twelve years ago. As ocean city mayor Rick Meehan has so aptly and consistently stated, we support clean energy in Maryland including offshore wind but stand together in strong opposition to the size and location of the wind turbines. when the size of the turbines were first agreed upon in 2012, they were 2 mega watt (mw) towers and approximately 200 feet high. Now these turbines have been increased to 12 mega watt (mw), towering 850 feet tall, with blades alone larger than the statue of liberty at 361 feet long yet located the same distance from shore. For the past five years, the town of ocean city has made a fair and reasonable request that the lease areas either be relocated further off Ocean City's coast or new lease areas be created further offshore. not only has this reasonable request gone unanswered, but the projects have dramatically increased in size with more and larger turbines. We are dismayed by the unwillingness to work with us on the distance, and do not understand how other states have moved forward in protecting their coasts while Maryland is looking at more and bigger turbines as close as 11 miles off the qc beach. For example, offshore wind farms in Virginia and North Carolina are 27 and 30 miles off the coast, preserving the views from Virginia Beach and the Carolina beaches. Further, the state of New York passed legislaton requiring turbines to be 20 miles offshore. Consistent with our past requests and the strong case that the town of ocean city has made, I will continue to move the turbines further offshore. |
| BOEM-2022-0025-DRAFT-0074-364 | Anonymous Anonymous 9 | Individual | None | Alternatives - Project relocation | Move the Turbines further out like 35 miles offshore. This way we dont have to look at them. In addition the present designated position is also in the migratory path of the right whales and ducks and geese. Why impact one environmental group to provide wind energy that can be provided further offshore and out of the way. |
| BOEM-2022-0025-DRAFT-0076-366 | Mark Newcomer | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0078-372 | Meryl Hutzler | Individual | None | Alternatives - Project relocation | I am concerned about the environmental impact and disruption these wind farms will have on our beach in North Delaware. Please consider pushing the farms out to 30 miles so beyond the coastal view. |
| BOEM-2022-0025-DRAFT-0080-374 | fred levy | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0082-380 | Danny Smith | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0083-385 | Robert Kowalski | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0084-390 | Andrew Levy | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0085-395 | Anonymous Anonymous 12 | Individual | None | Alternatives - Project relocation | As we saw in Europe in 2021, the wind blows when it blows, making it an unreliable source of consistent energy. That said, if Maryland wants to pay for an unreliable energy source it should. But it should not impose its decision on its Delaware neighbors by bringing wind energy ashore in Sussex County or anywhere else in Delaware, disrupting our beaches and roads with construction benefitting only Maryland. Why would the work not be done entirely in Maryland if these offshore wind farms are for the benefit only of those in Maryland? Is it possible that those in Maryland want only the benefits, such as they are, of unreliable wind energy but want to impose the burdens on its neighbors? Every elected public official in Delaware should oppose Maryland's encroachment on our state for its own purposes. |
| BOEM-2022-0025-DRAFT-0086-396 | Suzanne Battista | Individual | None | Alternatives - Project relocation | If these wind farms are to be built, MOVE THE LEASE AREAS FURTHER OFF SHORE AWAY FROM MIGRATORY PATHWAYS AND FISHING GROUNDS AND FAR ENOUGH AWAY TO NOT BE VISIBLE FROM SHORE.....<br>PLEASE RECONFIGURE THE LEASES TO BE FURTHER OFF SHORE TO MINIMIZE THE IMPACT ON NATURE AND OUR BEAUTIFUL SHORELINE. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0088-402 | Brett Gauntlett | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0089-408 | Pat & Miles Weigold | Individual | None | Alternatives - Project relocation | BOEM should require US Wind to move its wind turbines at least 30 miles offshore, or limit the height of its turbines, to ensure that the wind turbines are not visible from the shore….<br>2.BOEM should require US Wind to bring its high-voltage transmission lines onshore in Maryland, not Delaware. .... |
| BOEM-2022-0025-DRAFT-0092-412 | Stephen Schmidt | Individual | None | Alternatives - Project relocation | BOEM should require US Wind to move its wind turbines at least 30 miles offshore, or limit the height of its turbines, in order to ensure that the wind turbines are not visible from the shore….. BOEM should require US Wind to bring its high-voltage transmission lines onshore in Maryland, not Delaware. |
| BOEM-2022-0025-DRAFT-0093-414 | Kirk Simme | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0095-420 | David Dempsey | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0096-426 | Mike Renshaw | Individual | None | Alternatives - Project relocation | Third, what is the big deal pushing the locations of the turbines east by 5 miles?? Again, you'll get far less pushback if no one can see the turbines. If you eliminate the view issue it's one less thing to deal with. Look at Martha's Vineyard and Coastal Virginia...no view...no/less issues. |
| BOEM-2022-0025-DRAFT-0097-427 | James Roberts | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0099-433 | Mary Simme | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |

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| BOEM-2022-0025-DRAFT-0101-439 | MICHAEL PINKERT | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0103-446 | Beverly Newborn | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0105-452 | Matthew Morris | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0106-458 | Dennis OBrien | Individual | None | Alternatives - Project relocation | BOEM should require US Wind to move its wind turbines at least 30 miles offshore, or limit the height of its turbines, in order to ensure that the wind turbines are not visible from the shore. As US Wind has unilaterally decided to double, and perhaps triple, the height of its turbines, they should likewise have to move to a new lease area further from shore in order to lessen the visible impact on the beach communities and/or be required to submit for re approval an updated plan which details and locks in the technology they will be using on the project. |
| BOEM-2022-0025-DRAFT-0106-460 | Dennis OBrien | Individual | None | Alternatives - Project relocation | BOEM should require US Wind to move its wind turbines at least 30 miles offshore, or limit the height of its turbines, in order to ensure that the wind turbines are not visible from the shore. As US Wind has unilaterally decided to double, and perhaps triple, the height of its turbines, they should likewise have to move to a new lease area further from shore in order to lessen the visible impact on the beach communities and/or be required to submit for re approval an updated plan which details and locks in the technology they will be using on the project. |
| BOEM-2022-0025-DRAFT-0108-464 | Betsy Brino | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0111-474 | Stuart Bowers | Individual | None | Alternatives - Project relocation | Wind turbines should:<br>1. Not be visible from shore. Visitors pay a lot for a relaxing vacation with a spectacular view of the ocean. Either reduce size of turbines closer to shore or move them further off shore. This is not complicated. |
| BOEM-2022-0025-DRAFT-0112-477 | Todd Goldthwaite | Individual | None | Alternatives - Project relocation | There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS. |

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| BOEM-2022-0025-DRAFT-0112-478 | Todd Goldthwaite | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0113-479 | Doug Brinkley | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0114-484 | Julia Deves | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0115-489 | Aaron Deves | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0116-494 | Kamran Givpoor | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0117-499 | Stephanie Hoyle | Individual | None | Alternatives - Project relocation | Please consider moving this lease 30 miles off shore. |
| BOEM-2022-0025-DRAFT-0118-501 | Robert Taylor | Individual | None | Alternatives - Project relocation | The towers' visual effect will ruin the ocean view along the coast of Delaware. Vacationers and homeowners will seek someplace else along the East Coast for seaside recreation. If the towers were moved 30 miles offshore, the beautiful ocean view would be preserved. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0119-503 | Anonymous Anonymous 13 | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0120-508 | James Bond | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0122-514 | P. Breger | Local agency | Town of Fenwick Island (Delaware) | Alternatives - Project relocation | The lease areas in this review, assigned to<br>US Wind, is too close to the shoreline and should be moved a minimum of 30 nautical miles East of the coast to BOEM's new lease areas that better accommodate the newer sized wind turbines. As chairman of the Fenwick Island Environmental Committee I am submitting a Resolution ratified by the Town of Fenwick Island, Delaware which requests BOEM adopt a 30 mile "exclusion zone" for the reasons stated in the Resolution. Please submit the attached Resolution for formal review and do what it takes to develop this Offshore wind project the right way for human and marine life alike. |
| BOEM-2022-0025-DRAFT-0124-518 | Greg Venit | Individual | None | Alternatives - Project relocation | There are locations on Assawoman Bay that offer shorter water crossing and impact fewer boaters. |
| BOEM-2022-0025-DRAFT-0125-519 | Behnaz Yalda | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0126-524 | Penn Wyrough | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0130-532 | Anonymous Anonymous 14 | Individual | None | Alternatives - Project relocation | I am strongly opposed to the construction and operation of the wind turbines along the Delaware coast. I would urge you to restrict this project to at least 50 miles from any shoreline. It is visual pollution and will wreak havoc on the coastal ecosystem. Thank you - |
| BOEM-2022-0025-DRAFT-0131-536 | Stefani Culver | Individual | None | Alternatives - Project relocation | US Wind has increased the size of their proposed turbines successively from 600 feet to 938 feet, with the likelihood of going to at least 1,042 feet (about the height of the Eiffel Tower). Yet, they have maintained the distance from shore at 15 miles. Up to 121 wind turbines will be fully visible from Bethany Beach at all daytime hours and when lit at night. The Coastal Virginia Offshore Wind (CVOW) is 27 miles offshore. In Massachusetts, Martha's Vineyard fought back to move their turbines 35 miles offshore. Of course, it make sense to move the Maryland project further offshore as well. Lastly, none of the benefits of this project go to Delaware. The energy and the jobs all go to Maryland. Delaware homeowners were never included in the decision making yet the wind farms will have a direct impact on Tower Shore's views, our marine life and perhaps our dunes. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0132-537 | John Harman | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0135-549 | John Hynes | Individual | None | Alternatives - Project relocation | I'm all for renewable energy but let us do it in a responsible way. Why should we in Delaware have 900+ hight wind turbines installed so close to our shores that the impact to our shores will be forever impacted in a negative way. I believe we should require the installation of these turbines be at least 25 - 30 miles offshore (if at all). Also note how the Block Island turbines were placed so that beach views were not affected. |
| BOEM-2022-0025-DRAFT-0137-552 | MICHAEL HOY | Individual | None | Alternatives - Project relocation | If these wind farms are to be built, MOVE THE LEASE AREAS FURTHER OFF SHORE AWAY FROM MIGRATORY PATHWAYS AND FISHING GROUNDS AND FAR ENOUGH AWAY TO NOT BE VISIBLE FROM SHORE. My concerns are: Responsible research shows the proposed turbine construction will diminish commercial fishing for 30+ years, interfere with navigational radar and will cause "pre-agreed upon electric rates" to soar; Most new jobs from this project will go to European countries, with just a few in Maryland and Delaware; The marine environment will be destroyed due to habitat disruption impacting whales, porpoises, horseshoe crabs (which are vital to medical research); The impact on migratory bird pathways will result in bird kills of unknown proportions; The skyline will be permanently adulterated, with these tall windmills visible from shoreline (especially when lit up at night). PLEASE RECONFIGURE THE LEASES TO BE FURTHER OFF SHORE TO MINIMIZE THE IMPACT ON NATURE AND OUR BEAUTIFUL SHORELINE. |
| BOEM-2022-0025-DRAFT-0139-559 | Bruce Genderson | Individual | None | Alternatives - Project relocation | I am a strong proponent of wind and other alternative energy sources, and recognize that we cannot solve our clean energy problems if everyone favors alternative sources, but not in their own neighborhoods. Nonetheless, I believe that the turbines could be placed further off shore to reduce significantly or eliminate their impact on the views of the ocean that we all enjoy at the beach. I've attached the resolution just passed by Tower Shores, which which I agree, although my primary concern is with the impact on views as I assume that the power line will be placed in a manner to not impact the dunes and the off shore reefs. I therefore request that the wind turbine leases be moved from the current 15 miles offshore to 30 miles. |
| BOEM-2022-0025-DRAFT-0143-573 | Linda Sweeney | Individual | None | Alternatives - Project relocation | We oppose granting US Wind a permit to make landfall in 3RS beach. We also oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower with in viewing distance from the coastline of Delaware. We oppose the transmission lines going through the inland bays .BOEM conducted a study showing visualizations of 600' tall turbines to survey respondents from 16 points on beaches expected to have future turbines ( BOEM 2015 - 044 ). Because of this study New York recommended that no turbines be built within 20 miles of the coast and BOEM agreed and cancelled the lease 12 miles off the Hamptons. Larger turbines suggest they should be excluded at least 30 miles off the coast. |
| BOEM-2022-0025-DRAFT-0144-576 | Regina Vargo | Individual | None | Alternatives - Project relocation | Much of the analysis underlying this EIS is using outdated assumptions that will significantly minimize the harmful impacts of this project. The developer is now proposing to use the largest turbines currently on the market (the GE Haliade-X 12 megawatt turbine), which are one-third taller than originally proposed. These giant structures will replace pristine ocean views with an industrial seascape, with potentially devasting -- and irreversible -- effects on Delaware's local tourism, property values and environment. We oppose this project as currently contemplated, but would support a project pushed further out (30 miles is a distance that many have recommended.) Supporters of offshore wind energy need to get the balance right between preserving our natural beauty, resources and economy and our contribution to address global warming. |
| BOEM-2022-0025-DRAFT-0146-584 | Elizabeth Frazee | Non-governmental organization | Tower Shores Beach Association Board of Directors | Alternatives - Project relocation | BOEM should require US Wind to move its wind turbines at least 30 miles offshore, or limit the height of its turbines, in order to ensure that the wind turbines are not visible from the shore. As US Wind has unilaterally decided to double, and perhaps triple, the height of its turbines, they should likewise have to move to a new lease area further from shore in order to lessen the visible impact on the beach communities. |
| BOEM-2022-0025-DRAFT-0147-586 | E. B. Cohen | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS. 3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0149-592 | Charles Licameli | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0152-599 | Harjeet van der Keyl, David van der Keyl | Individual | None | Alternatives - Project relocation | We're not happy having wind turbines easily visible from our home in Bethany Beach. If moving a few turbines farther away helps the case, we would strongly favor that…. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0155-604 | Andrew Finley | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0156-609 | Joanne Finley | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0157-614 | Anonymous Anonymous 16 | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS. 3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0158-619 | Piper Bond | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS. 3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0159-624 | Dawn Bellinger | Individual | None | Alternatives - Project relocation | I approve of the wind farm but would prefer it moved 15 miles offshore instead of only 10 as 15 miles is the point at which it is no longer visible. Thank you! |
| BOEM-2022-0025-DRAFT-0163-629 | Steve Plotkin | Non-governmental organization | Ocean Hamlet Homeowners Association | Alternatives - Project relocation | BOEM should require US Wind to move its wind turbines at least 30 miles offshore, or limit the height of its turbines, in order to ensure that the wind turbines are not visible from the Delaware shore. When the lease area was first proposed, the height of the wind turbines was estimated to be 300-400'. Now, the US Wind proposal states the turbines will be at least 938' tall. Worse, we do not know if this is the end of the height increases. We are concerned that these giant turbines will negatively impact tourism in Bethany Beach, our ability to attract rental income and our property values. |
| BOEM-2022-0025-DRAFT-0164-632 | Steve Plotkin | Individual | None | Alternatives - Project relocation | BOEM should require US Wind to move its wind turbines at least 30 miles offshore, or limit the height of its turbines, in order to ensure that the wind turbines are not visible from the Delaware shore. When the lease area was first proposed, the height of the wind turbines was estimated to be 300-400'. Now, the US Wind proposal states the turbines will be at least 938' tall. Worse, we do not know if this is the end of the height increases. We are concerned that these giant turbines will negatively impact tourism in Bethany Beach, our ability to attract rental income and our property values. |
| BOEM-2022-0025-DRAFT-0166-653 | The Chancellery Homeowners Association | Non-governmental organization | The Chancellery Homeowners Association | Alternatives - Project relocation | Chancellery Homeowners Association respectfully urges that BOEM condition any approval of the US Wind project on (1) the wind turbines all being moved at least 30 miles offshore so they will not be visible from shore, (2) the high-voltage transmission lines coming ashore somewhere other than Delaware, where benefits are not provided and homeowners have not been included in decision-making, and (3) completion of all vital studies needed to ensure the protection of whales and other marine and bird species. If for any reason BOEM cannot apply all three conditions to its approval, then we urge BOEM to reject the proposed project. |
| BOEM-2022-0025-DRAFT-0174-669 | Robert Shue | Non-governmental organization | Indian Beach Homeowners Association | Alternatives - Project relocation | We are not opposed to having a windfarm but are against the windfarms being so large and so close to our beach. We believe the windfarms will be an eye sore, will degrade the value of our property and will diminish our beautiful views. We believe the wind farm should move at least 30 miles off shore below the horizon and out of view from the beach. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0176-672 | Michael Heck | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0177-677 | David Sheats | Individual | None | Alternatives - Project relocation | You threatened Edward Kennedy with windmills but of course that didn't go through. Should be on a Maryland shore. Thierry electric. |
| BOEM-2022-0025-DRAFT-0180-688 | Laura Stees | Individual | None | Alternatives - Project relocation | I do not want the wind mills off of Bethany Beach coast line at all....but it they are placed there they should be at least 30 miles out. |
| BOEM-2022-0025-DRAFT-0182-692 | William Truitt | Non-governmental organization | Cotton Patch Hills Association, Inc. | Alternatives - Project relocation | BOEM SHOULD REQUIRE US WIND TO EVALUATE THE IMPACTS OF MOVING ITS WIND TURBINES AT LEAST 30 MILES OFFSHORE AND/OR LIMIT THE HEIGHT AND NUMBER OF TURBINES SO THEY ARE NOT VISIBLE FROM THE SHOREUNE. |
| BOEM-2022-0025-DRAFT-0195-732 | George Krusen | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0199-748 | Susan Brennan | Individual | None | Alternatives - Project relocation | 8. I am concerned that when this project was originally proposed in Maryland, it was given a "green light" to proceed based on a specific distance and height of turbine. The height of the turbine and location of substations since that has increased exponentially, however the distance from shore has not been considered. I would request that the lease move thirty miles off the coast of Maryland and Delaware. |
| BOEM-2022-0025-DRAFT-0201-752 | Sara Miles | Individual | None | Alternatives - Project relocation | 1.BOEM should require US Wind to move its wind turbines at least 30 miles offshore, or limit the height of its turbines, in order to ensure that the wind turbines are not visible from the shore. When the lease area was first proposed, the height of the wind turbines was estimated to be 300-400'. A few years ago, US Wind formally proposed using 600' tall turbines. More recently, US Wind raised that height to 853' tall. Now, its proposal states the turbines will be at least 938' tall. Worse, we do not know if this is the end of the height increases. US Wind says in its proposal that it will move to even bigger turbines if available, and another project (Kitty Hawk, NC) is already using 1,042' tall turbines. Each increase in height diminishes the visual beauty of the Atlantic Ocean that so many of us, homeowners, renters and visitors, enjoy, and can impact tourism and the economic value to our community in Delaware. BOEM has participated in other wind turbine projects being pushed further offshore (Kitty Hawk, Hampton, and Virginia), and it should do so again here. As US Wind has unilaterally decided to double, and perhaps triple, the height of its turbines, they should likewise have to move to a new lease area further from shore in order to visible impact on the beach communities. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0204-762 | Stephani Ballard Wagner | Individual | None | Alternatives - Project relocation | It is my position and request that, in consideration of the factors below, BOEM should reject the US Wind Project (hereinafter “Project”) and adopt the “no action alternative,” or in the alternative, BOEM should conclude that a reasonable, and less detrimental alternative exists in that US Wind should reapply to have the state portions of the Project, including all on-shore access points, strictly within the State of Maryland, which is the state in which the “Lease Area” entirely resides.<br><br>The US Wind Project, as currently presented, is not in the public interest and, due to the many known and unknown risks and detriments to biological resources, environmental habitats, physical resources and human and cultural resources, the Project should be rejected.<br>ENTRY INTO DELAWARE AND DELAWARE LANDS IS NOT AN APPROPRIATE NOR LEGALLY/CONTRACTUALLY JUSTIFIED PART OF THE MARYLAND PROJECT AND NO PART OF THE PROJECT SHOULD PHYSICALLY IMPACT DELAWARE (VIA TARGETING DELAWARE LANDS AND WATERS FOR LANDFALL) AT THIS JUNCTURE FOR THE FOLLOWING REASONS:<br>• This Project proceeds under one or more commercial leases. The “Lease Area” according to US Wind’s proposal and drawings, and BOEM is solely “an area offshore Maryland.” No Delaware entity has entered into any agreements or leases with US Wind. No financial consideration has been given to Delaware.<br>• US Wind obtained their lease through a Maryland bid program. The US Wind project was approved by and is subject to the Maryland Public Service Commission, and all of the electric power will be received by consumers in Maryland.<br>• The Lease, per the NOI “requires BOEM to make a decision on the lessee’s plan to construct and operate a commercial scale offshore wind energy facility in the Lease Area.” (emphasis added). The Lease area is Maryland, yet the COP sets forth US Wind’s unilateral decision to enter and impact Delaware waters and lands to have its cables buried within the Delaware seabed make landfall in Delaware (many miles from the Lease area) and then be again routed underground (through either roadways or the Delaware Bay and wetlands) to Delaware power substations so that the energy can be again routed underground through Delaware and sent to Maryland.<br>• US Wind has informally represented (although problematically not documenting support in the COP) that Maryland power substations are “too small” to accept the amounts of energy coming ashore and that their grid is old and subject to “faults.” Importantly, Maryland put out the bid for a Maryland Project, presumably cognizant of its own inland power capabilities.<br>• Even if Maryland substations may have issues (and it is far from clear that the Delaware substations do not), US Wind offers no reasons why it cannot improve them as part of the Project and/or step the incoming power down in Maryland to levels workable for delivery to Maryland substations, in keeping with the scope of the Project and the Lease Area.<br>• Keeping in mind that Orsted/Skipjack has an even larger OW project in the planning stages, which also likely intends to make landfall in Delaware, it is unknown whether the Delaware substations would be overwhelmed and unable to handle the inflow of this much power were both Projects to be approved. Orsted is also a project awarded by and for the benefit of Maryland.<br>• The COP itself represents that the Project is for the benefit of the State of Maryland and fulfillment of its energy goals<br>• Upon information and belief, no Delaware State or local officials, and certainly no homeowners were consulted or provided input about US Wind’s plans to utilize Delaware for a sizable part of its Project infrastructure until the COP was issued and applications were made.<br>• US Wind’s targeted area for landfall in Delaware is 3Rs Road, a popular public fishing and recreational beach, in very close proximity to a large number of residential properties, including my own. The noise, economic and possible health impacts of bringing four 230 kV high-voltage export cables onshore under the Delaware public beach at 3-Rs Road is not appropriate, and it should be required that US Wind find an onshoring location in Maryland for its Maryland wind project.<br>• It should be noted that US Wind moved the onshore location to Delaware when Maryland residents complained. This is a Maryland Project and the benefits are in Maryland; the infrastructure along with its accompanying risks, intrusion and detriments should not be “offshored” to people in Delaware who were barely, if at all, consulted, and who will receive no long-term benefit.<br>• Under the circumstances, if federally approved, the use of Delaware lands and resources, and impact on private properties, might properly be challenged as a taking. |
| BOEM-2022-0025-DRAFT-0206-796 | Brooks Gearhart | Individual | None | Alternatives - Project relocation | 1. US Wind’s proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland’s residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind’s plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind’s plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind’s plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind’s plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind’s proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind’s Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0208-802 | Catherine Gearhart | Individual | None | Alternatives - Project relocation | 1. US Wind’s proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland’s residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind’s plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind’s plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind’s plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind’s plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind’s proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind’s Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |

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| BOEM-2022-0025-DRAFT-0209-807 | David Gearhart | Individual | None | Alternatives - Project relocation | 1. US Wind's proposed Maryland wind energy facility should be designed, constructed and operated in a manner that does not impact Delaware lands, resources and residents. BOEM states that it will benefit Maryland's residents, renewable energy goals, job opportunities and air quality without any direct or tangible benefit to Delaware lands, resources or residents. Accordingly, I/We:<br>• oppose US Wind's plan to construct and operate offshore wind turbine generators, transformers and meteorological tower within viewing distance from coastline of Delaware;<br>• Oppose US Wind's plan to install offshore export cables off the coast of Delaware;<br>• Oppose US Wind's plan to install onshore export cables that make landfall in Delaware;<br>• Oppose US Wind's plan to install onshore export cables beneath Indian River Bay and Indian River.<br>2. There are other landfall locations in Maryland that are much closer to US Wind's proposed offshore wind farm and that could access new or existing Delmarva Power substations that are not presented or evaluated in US Wind's Construction and Operations Plan (COP). These other alternatives should be evaluated in the EIS.<br>3. Lower export voltage levels (less than 230 KV) could be interconnected to closer electrical substations in Maryland have not been presented or evaluated in the COP. This design approach, including stepping down the 230 KV export voltage, should be evaluated in the EIS and alternative export routes where lower voltage substations and transmission lines assessed. |
| BOEM-2022-0025-DRAFT-0210-816 | Niall O'Malley | Individual | None | Alternatives - Project relocation | Developing the windfarms further offshore would help save endangered migratory birds and Monarch butterflies. Endangered fin, minke and sperm whale populations would benefit from uninterrupted access to coastal feeding grounds. In addition, offshore navigation hazards for coastal barges would be reduced as well. An understudied option is landfall in Maryland. Why is a Maryland backed project worth nearly $3 billion project not making landfall in Maryland? Delaying in shore windfarm development would provide time for needed studies and research to ensure your actions save nature rather than destroy it, while preserving the most important regional economic engine – tourism and the visual appeal of the Delaware beaches. |
| BOEM-2022-0025-DRAFT-0212-827 | Amy Kyle | Individual | None | Alternatives - Project relocation | Department of Interior Should Select Least Impactful Areas for Leasing<br>The selection of the areas for leasing was done with very limited if any environmental review and very limited consultation. The Maryland project was one of the early ones done before some of the information available now was available and before the scientific resources now mobilized were available. The limited environmental review done was based on very little data and cannot be considered credible or sufficiently reliable to base a siting action.<br>BOEM should reconsider the satin of the US Wind project to determine if areas further offshore would offer comparable or improved wind resources with less conflicts with marine species and also other users. Development further offshore is being planned already through a separate lasing process. It appears that moving the US Wind project out to the currently considered leasing area would vastly reduce conflicts. This is within the scope of the authority of the Department of Interior. Leasing arrangements have been rearranged when sought by the turbine companies. Leased areas are now being located further from coastal communities and active coast lines than the 9 or 10 miles for the US Wind project. |
| BOEM-2022-0025-TRANS-22-77 | Terence McGean | Local agency | Ocean City | Alternatives - Project relocation | If this project threatens the local economy to the extent that we believe it will, the project must extent that we believe it will, the project must be scaled back and moved further offshore.<br>We know this is possible.<br>The current demonstration project off Virginia Beach is 27 miles from their coast. |
| BOEM-2022-0025-TRANS-30-108 | Harjeet van der Keyl | Individual | None | Alternatives - Project relocation | And the second thing is, if this is to benefit Maryland, why are Delaware beaches involved? |
| BOEM-2022-0025-TRANS-33-115 | Robert Taylor | Individual | None | Alternatives - Project relocation | I'm from North Bethany Beach, Delaware, and my comment is that the turbines are simply designed to be too close to the coast. They should be moved further out so as not to be visually obstruct our view of the ocean. |
| BOEM-2022-0025-TRANS-34-116 | Sarah Miles | Individual | None | Alternatives - Project relocation | And we noted that recently at Kitty Hawk, North Carolina, BOEM extended the lease area for the Wind project there, out from 12 miles and pushed it out to almost 28 miles. There are a couple of other communities where something similar has come up, of course, and they've been pushed out to between 20 and 30 miles as well. And I wanted to ask whether that was something that was under consideration or to which BOEM was at least open to, considering that in its NEPA analysis, particularly given that the project developer has increased the eight of its proposed Turbans from 600ft to 853ft.And if you are not willing to consider that, I'd be interested in the reason why. Thank you. |
| BOEM-2022-0025-TRANS-51-167 | Richard Meehan | Local agency | Ocean City, Maryland | Alternatives - Project relocation | I asked then that these turbines be relocated further off our coast and the new lease areas be considered. I stated then, and I'll repeat, we only get one chance to get this right. |
| BOEM-2022-0025-TRANS-51-169 | Richard Meehan | Local agency | Ocean City, Maryland | Alternatives - Project relocation | Other states have approved and even built turbines further off their coast, and their ocean fronts have been protected. For example, the lease area off the coast of Virginia and North Carolina respectively, are 27 to 30 miles offshore, preserving the economy and abuse from those beaches. |
| BOEM-2022-0025-TRANS-51-170 | Richard Meehan | Local agency | Ocean City, Maryland | Alternatives - Project relocation | Working with BOEM to establish additional lease areas, as we suggested five years ago, would create opportunity for additional ORECs to be awarded, accomplish the state's goal to provide clean energy while at the same time preserving our natural environment and pristine views for additional generations. |
| BOEM-2022-0025-TRANS-58-192 | Mary Beth Carozza | State agency | Maryland State Senator District 38 | Alternatives - Project relocation | I joined with man in the town of Ocean City in supporting clean energy in Maryland, including offshore wind. But we stand together in opposing the current plans that would build these turbines at heights towering 850ft with blades larger than the Statue of Liberty, and we remain extremely concerned that the turbines can be located as close to 11.5 miles off of Ocean City's beaches. This request is partially based on the economic studies by North Carolina State University, Delaware State University and the University of Delaware that all predict significant negative economic impacts to beach economies from visible offshore wind turbines. As Ocean City Town Manager Terry McKeen testified, Bones owned study by the University of Delaware states at 12.5 miles offshore. I also want to highlight that the offshore wind farms in Virginia, North Carolina are 27 and 30 miles off the coast, preserving the views for Virginia Beach and the Carolina beaches. |
| BOEM-2022-0025-DRAFT-0038-279 | Timothy Leahy | Individual | None | Alternatives - Wind turbines | And finally, the visual impact of these 1000' towers will alter the natural viewshed , creating an adverse impact. This can be mitigated. Move the location 5-8 miles further from shore, as has been done in North Carolina. No data has been presented which explains why this has been rejected as an option. This project should not be approved until this option is considered. |
| BOEM-2022-0025-DRAFT-0039-281 | Lizbeth Lear | Individual | None | Alternatives - Wind turbines | The lease areas should by FURTHER OFF SHORE - away from fishing grounds and migratory pathways.<br>I do not want to view 850' tall turbines from my shoreline. |
| BOEM-2022-0025-DRAFT-0053-321 | Angela Silverman | Individual | None | Alternatives - Wind turbines | US Wind has increased the size of their proposed turbines successively from 600 feet to 938 feet, with the likelihood of going to at least 1,042 feet (about the height of the Eiffel Tower). Yet, they have maintained the distance from shore at 15 miles. Up to 121 wind turbines will be fully visible from Bethany Beach at all daytime hours and when lit at night. The Coastal Virginia Offshore Wind (CVOW) is 27 miles offshore. In Massachusetts, Martha's Vineyard fought back to move their turbines 35 miles offshore. It would make sense to move the "Maryland project" further offshore as well. |
| BOEM-2022-0025-DRAFT-0168-655 | Karen Auwaerter | Individual | None | Alternatives - Wind turbines | Visibility of the Turbines-As an initial matter, I note that the pictures provided by U.S. Wind during the presentation depict<br>a wildly different picture of the turbines' visibility than the pictures on the BOEM website. No explanation was given for the variability among the visibility of the turbines in these pictures. In addition, the Orsted/Skipjack proposal neither includes projected visibility pictures nor a timeline for when they would be available was offered. How can Delaware approve a wind farm so near shore without accurate and consistent visibility projections that have been subject to public<br>review and comment? Location and Height of the Turbines - The presenters were repeatedly asked, including by those supportive of turbines in general, why these couldn't be places further out to protect the beauty of the Delaware coast, the coastal environment, and coastal migratory birds in particular. They never had an answer beyond "it isn't feasible". Because of depth? Currents? Or because it might eat into these companies' profits? Similar as to the location of the turbines, questions as to the lowering the height of the turbines were not answered. Many concerns voiced by Delaware residents (visibility, noise, impact on coastal flora and fauna) may be alleviated by moving the turbines further off shore and/or lowering their height. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0170-660 | Lou Manzo | Individual | None | Alternatives - Wind turbines | Visibility of the Turbines-As an initial matter, I note that the pictures provided by U.S. Wind during the presentation depict a wildly different picture of the turbines' visibility than the pictures on the BOEM website. No explanation was given for the variability among the visibility of the turbines in these pictures. In addition, the Orsted/Skipjack proposal neither includes projected visibility pictures nor a timeline for when they would be available was offered. How can Delaware approve a wind farm so near shore without accurate and consistent visibility projections that have been subject to public review and comment? Location and Height of the Turbines - The presenters were repeatedly asked, including by those supportive of turbines in general, why these couldn't be places further out to protect the beauty of the Delaware coast, the coastal environment, and coastal migratory birds in particular. They never had an answer beyond "it isn't feasible". Because of depth? Currents? Or because it might eat into these companies' profits? Similar as to the location of the turbines, questions as to the lowering the height of the turbines were not answered. Many concerns voiced by Delaware residents (visibility, noise, impact on coastal flora and fauna) may be alleviated by moving the turbines further off shore and/or lowering their height. |
| BOEM-2022-0025-DRAFT-0179-684 | Kathleen Campanella | Individual | None | Alternatives - Wind turbines | Visibility of the Turbines - As an initial matter, I note that the pictures provided by U.S. Wind during the presentation depict a wildly different picture of the turbines' visibility than the pictures on the BOEM website. No explanation was given for the variability among the visibility of the turbines in this picture. In addition, the Orsted/Skipjack proposal does not include projected visibility pictures and no timeline for when they would be available was offered. A wind farm so near shore should not be approved without accurate and consistent visibility projections that have been subject to public review and comment. Location and Height of the Turbines: The presenters were repeatedly asked, by those supportive of turbines, why these couldn't be placed further out to protect the beauty of the Delaware coast, the coastal environment, and the migratory birds in particular. They never had an answer beyond "it isn't feasible." It certainly seems that the Companies profits are the reason. Similar to the location of the turbines, questions as to the lowering the height of the turbines were not answered. Many concerns voiced by Delaware residents (visibility, noise, impact on coastal flora and fauna) may be alleviated by moving the turbines further off-shore and/or lowering their height. |
| BOEM-2022-0025-DRAFT-0186-708 | Sarah Albertson | Individual | None | Alternatives - Wind turbines | Visibility of the Turbines-As an initial matter, I note that the pictures provided by U.S. Wind during the presentation depict a wildly different picture of the turbines' visibility than the pictures on the BOEM website. No explanation was given for the variability among the visibility of the turbines in these pictures. In addition, the Orsted/Skipjack proposal neither includes projected visibility pictures nor a timeline for when they would be available was offered. How can Delaware approve a wind farm so near shore without accurate and consistent visibility projections that have been subject to public review and comment? Location and Height of the Turbines - The presenters were repeatedly asked, including by those supportive of turbines in general, why these couldn't be places further out to protect the beauty of the Delaware coast, the coastal environment, and coastal migratory birds in particular. They never had an answer beyond "it isn't feasible". Because of depth? Currents? Or because it might eat into these companies' profits? Similar as to the location of the turbines, questions as to the lowering the height of the turbines were not answered. Many concerns voiced by Delaware residents (visibility, noise, impact on coastal flora and fauna) may be alleviated by moving the turbines further off shore and/or lowering their height. |
| BOEM-2022-0025-DRAFT-0187-713 | John Donofrio | Individual | None | Alternatives - Wind turbines | Visibility of the Turbines - As an initial matter, I note that the pictures provided by U.S. Wind during the presentation depict a wildly different picture of the turbines' visibility than the pictures on the BOEM website. No explanation was given for the variability among the visibility of the turbines in this picture. In addition, the Orsted/Skipjack proposal does not include projected visibility pictures and no timeline for when they would be available was offered. A wind farm so near shore should not be approved without accurate and consistent visibility projections that have been subject to public review and comment. Location and Height of the Turbines: The presenters were repeatedly asked, by those supportive of turbines, why these couldn't be placed further out to protect the beauty of the Delaware coast, the coastal environment, and the migratory birds in particular. They never had an answer beyond "it isn't feasible." It certainly seems that the Companies profits are the reason. Similar to the location of the turbines, questions as to the lowering the height of the turbines were not answered. Many concerns voiced by Delaware residents (visibility, noise, impact on coastal flora and fauna) may be alleviated by moving the turbines further off-shore and/or lowering their height. |
| BOEM-2022-0025-DRAFT-0203-760 | Diane Rosenberg | Individual | None | Alternatives - Wind turbines | The windmills must be beyond view of the shore…..This project is not in the best interest of Delaware owners and will effect real estate values throughout the shore. I am gravely concerned of our well-being as well as the well being of marine life and bird safety. |
| BOEM-2022-0025-DRAFT-0204-763 | Stephani Ballard Wagner | Individual | None | Alternatives - Wind turbines | THE PROJECT'S PROPOSAL FOR UP TO 121 TURNBINES IN EXCESS OF 950 FEET TALL, ONLY 15 MILES FROM SHORE IS NOT APPROPRIATE NOR STANDARD FOR SUCH PROJECT AND, IF THE PROJECT IS TO PROCEED, BOEM SHOULD REQUIRE US WIND TO MOVE OR LIMIT ITS TURBINES TO AT LEAST 30 MILES OFFSHORE, TO ENSURE THAT THE WIND TURBINES ARE MINIMALLY VISIBLE FROM SHORE IN THIS VALUABLE AND UNIQUE NATURAL AND RECREATIONAL AREA. |
| BOEM-2022-0025-DRAFT-0205-782 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Alternatives - Wind turbines | The COP does not elaborate on the economic analysis, market or site conditions that led to the elimination of the "quieter" foundation types such as gravity-based and suction bucket foundations. Not only should US Wind provide any analysis it has already conducted on these alternatives, but BOEM should analyze the environmental impacts from these various foundation options, alongside mitigation measures to reduce these potential impacts.20 Doing so would explicitly illuminate the costs, benefits, and impacts of this choice while also allowing the agency to consider relevant minimization, mitigation, and monitoring requirements that appropriately weigh all options. Additionally, we encourage US Wind to reevaluate its analysis of suction caisson foundations in light of research by BOEM from August of 2021 comparing the environmental effects of turbine foundations including suction caisson foundations.21 Furthermore, US Wind intends to construct the Project, which consists of the 300 MW MarWin installation, and the 800 MW Momentum Wind22 installations over the course of four phases with construction occurring from 2024 through the end of 2027.23 Given the pace of industry advancement, BOEM and US Wind should consider the potential cost and technological advances that may accrue over the next six years that may make the inclusion of quieter, more environmentally responsible WTGs more viable. |
| BOEM-2022-0025-EMAIL-277-906 | Stepan Nevshehirlian | Federal agency | EPA | Alternatives - Wind turbines | The potential range in number, size, and layout of WTGs based on applicable requirements or consultation, avoidance of sensitive, high quality, or complex habitats, or other resources such as shipwrecks should be clearly described in the EIS. EPA recommends that alternatives that minimize impacts to offshore habitat be discussed. For the layout of the WTGs, OSSs, and inter-array cables in the lease area, the EIS should clarify what minimum scenarios would achieve the required MW of energy generation to identify flexibilities. It would also be beneficial to clarify location of resources, including sensitive habitats, to prioritize impact avoidance. Micro-siting efforts for WTGs and cable routes should be fully evaluated. |
| BOEM-2022-0025-TRANS-11-36 | Jonathan Phillips | Individual | None | Alternatives - Wind turbines | By reference, I would note that Ocean City believes in clean energy. Over 50% of the Ocean City government's electric supply comes from renewable energy sources. However, it also believes, like any other gigantic construction project, the development of renewable energy must be done responsibly, and that simply calling something green does not make it so. Once these projects are built, it will be too late to change them. So support the creation of a new Maryland offshore renewable energy lease area that is at least 30 miles from shore. We have one chance to get this right, and now is the time to do it. |
| BOEM-2022-0025-TRANS-13-46 | Mary Douglas | Individual | Private Practice, former EPA | Alternatives - Wind turbines | BOEM should make data on migratory birds and marine mammals from the first projects available to subsequent projects. BOEM needs to develop best mitigation practices and eventually require them, while nonetheless moving as quickly as possible to get these essential projects up and running. While there are many wind farms in Europe, most of them consist of smaller wind turbines spaced closer together. Researchers have determined that their dense placement creates a barrier effect, such that many birds perceive the wind farm as a single obstacle and avoid it entirely. But we don't know if that will hold true when wind turbines may be placed a kilometer or more apart from each other, because the big new turbines in more widely spaced wind farms haven't been installed anywhere yet. The Audubon Society strongly supports wind, but its support is not unconditional. The Society supports wind energy that is cited and operated properly to avoid, minimize, and mitigate effectively for the impact on birds and other wildlife. Last year, BOEM concluded that vineyard winds would have, quote, moderate negative impacts on birds, marine mammals and turtles. Can subsequent projects achieve minimal negative impacts ratings? US Wind is committed to making that a reality, and for its part, BOEM should evaluate the environmental impacts of all 17 projects on a rolling basis and should improve their safety to the greatest extent possible for migratory birds and other animal species. |
| BOEM-2022-0025-TRANS-20-68 | John Strangfeld | Individual | None | Alternatives - Wind turbines | I also wonder about the whole execution of this, whether it's the corridors where it's the substation connectivity, whether it's the construction of all this, and particularly whether that also gets affected by the height. If the height makes the visual more complicated, does it also make the foundations more complicated? |

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| BOEM-2022-0025-TRANS-38-137 | Kerrie Bunting | Local agency | Ocean Pines Chamber of Commerce | Alternatives - Wind turbines | Another is that when this project was initially brought up to that region in 2015, 2016. It was X amount of windmills, x amount of miles off, x amount of height. The project that is now in plan in place to happen resembles nothing of the original plan. Now these wind turbines are three times higher, three times closer, and there's ten times more. So by the time these things actually get in place, what will we actually be facing? Because the plan keeps changing to be closer, to be taller, and to be more of them. |
| BOEM-2022-0025-TRANS-61-203 | Dolores Greenwich | Individual | None | Alternatives - Wind turbines | And I would like to say that the last couple, three speakers, have really said what's on my mind, and that is that there are more considerations that need to be taken because the towers are much larger than they were originally anticipated, and they are closer than other comparative towers along the water. |
| BOEM-2022-0025-DRAFT-0184-698 | Jennifer Holmes | State agency | Delaware Department of Natural Resources and Environmental Control | Bats | Research, long-term monitoring, and adaptive management plans are important to safeguard wildlife. As the planning and analysis phase moves forward, DNREC recommends the following:<br>• Conduct research to determine impacts to bats during construction and during turbine operation using the best available technology. Examples include, but may not be limited to:<br>o Acoustic monitoring from stationary structures (e.g., buoys or floating platforms) as well as via boat transects.<br>o Use of radar to determine migration patterns for bats and birds.<br>o Bat migration studies that include monitoring offshore waters (MOTUS towers and Nano tags).<br>o Use of sensors attached to turbines to detect collisions.<br>o Use of thermal cameras (in association with sensors) to film collisions and possibly identify species or species groups.<br>• Work with biologists in affected states to prepare a minimization/mitigation plan that could include the following to reduce impacts to bats:<br>o Reduced use of turbines during migration seasons.<br>o Use of acoustic deterrents if any are found to be effective.<br>o Use of automated programs that predict when bat collisions are most likely to occur and curtail turbines only during those periods.<br>o Expand research to determine regional and cumulative impacts to wildlife. |
| BOEM-2022-0025-DRAFT-0205-795 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Bats | As US Wind's COP acknowledges,86 little data exist on the interactions between bats and offshore wind facilities. Bat fatalities from collisions are common at land-based wind facilities in the United States, especially during the fall migration,87 with the potential for cumulative impacts to cause population-level declines.88 However, information on bat impacts from land-based wind stems largely from post-construction carcass searches, which are not feasible in the offshore environment89 and therefore understanding and addressing impacts to bats from offshore wind facilities–similar to birds–will require novel monitoring technologies. US Wind's COP concludes that "[r]elatively few bat species and no federally-listed [bat] species use the offshore environment" and that "the probability of collision with a WTG is relatively low, therefore the impact of operating WTGs in the Lease area is considered to be negligible."91 The sparse data available on bats' use of the offshore environment in the region are insufficient to draw conclusions that bat risk is negligible. Moreover, it is inaccurate to say that no federally-listed species use the offshore environment as the northern long-eared bat–currently federally threatened but proposed for reclassifying as endangered92—has been documented offshore Determining methods to identify bat activity within offshore wind turbines' rotor-swept zones (including when this activity occurs and from which species) and detect collisions post-construction will be imperative to understanding bat risks from offshore wind development. Rather than rely on the pre-construction acoustic data collected by the metocean buoy to determine the need for post-construction bat monitoring,101 US Wind should develop a post-construction bat monitoring plan that includes a commitment to integrate strike detection technology, as it becomes commercially available and feasible to install offshore. Additionally, US Wind should deploy a Motus tower in the Project area as soon as technically feasible and support nanotagging of bats to better understand bat use of the Lease area (as discussed above for birds). Once turbines are in place, US Wind should install acoustic detectors at nacelle height to better measure activity within the turbine's swept area, where bats are at risk of collision. |
| BOEM-2022-0025-DRAFT-0046-295 | Victoria Venable | Non-governmental organization | Chesapeake Climate Action Network | Benthic Resources | Gravel and large cover stones are most commonly used to build the monopiles and cover buried cables. Large stones will create niches within the habitat that did not previously exist, enabling a wider variety of species to inhabit the ecosystem.25 These rocky sites serve as breeding, nesting, social, transitional, and cover sites for multiple aquatic species. Several different types of vegetation also grow on the rocks, which serve as a food source for many herbivorous organisms. The increase in aquatic species diversity at the bases of wind turbines attracts multiple avian species, some of which actively seek offshore wind farms for access to food. Because of the presence of larger substrates, the waters tend to be shallower than normal, creating distinct zonation at the monopiles.26 This enables more species to coexist in these areas by creating layers of varying resource availability. Overall, the introduction of larger substrates will have a net benefit for the environment by increasing biodiversity and total biomass by up to 7 percent.27 |
| BOEM-2022-0025-DRAFT-0053-320 | Angela Silverman | Individual | None | Benthic Resources | The power from the turbines will be brought ashore at 3-Rs Road in the Delaware State Park directly to our north. The four high-capacity cables will carry 1,000 MW of power and be buried through horizontal drilling directly off our beach. This drilling process will not be completed quickly, and US Wind (the owner of the project) has stated in filings that it will have an impact on the ocean floor. How will that alter ocean currents and growth of our dune system? |
| BOEM-2022-0025-DRAFT-0059-332 | Colleen Wilson | Individual | None | Benthic Resources | It is hard to believe that constructing so many 800+ tall turbines, drilling, pouring foundational materials on the ocean floor, running massive cables under the ocean floor and under our beaches and bay bottom will not have a significant impact on our pristine environment! In particular, we are most concerned about the horseshoe crab whose habitat is sure to be disrupted. This is simply unacceptable and hard to believe that our government is permitting this to happen. |
| BOEM-2022-0025-DRAFT-0165-649 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Benthic Resources | Any place where bottom sediments will be disturbed must be evaluated for sediment contamination to understand the potential for environmental effects associated with contaminant release. Two obvious sources of contamination are dredged spoils from inshore, nearshore, or harbor maintenance and disposal of onshore materials (including waste). For many years, such disposal was not evaluated carefully and not regulated as it is today. As a result, sediments and other material with unacceptable levels of heavy metals and persistent organic pollutants were disposed in ocean waters and may remain in locations where they could be disturbed. These sources of contamination need to be assessed and managed as part of the offshore wind development process.<br>The turbine and substation foundations may also create a wake effect. This could increase the amount of suspended sediment in the immediate area which could negatively impact filter feeding organisms, including commercially important species such as sea scallops. It could also impact the dispersal of pelagic larvae in the area. These impacts must be thoroughly considered in the EIS. |
| BOEM-2022-0025-DRAFT-0199-742 | Susan Brennan | Individual | None | Benthic Resources | 1. I am concerned about the amount of concrete that will be used to install and stabilize each of the hundreds of turbines/substations and the lasting effects on the sea floor. |
| BOEM-2022-0025-DRAFT-0202-759 | Thomas Brennan | Individual | None | Benthic Resources | I am concerned about the installation of the turbines and the amount of material it takes to secure them. How much does it take to secure a 931+ foot turbine located in the Atlantic Ocean?<br>I am completely against trenching and laying cable along the seafloor. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0212-830 | Amy Kyle | Individual | None | Benthic Resources | Even now, as the US Wind proposal is deemed by DOI to be complete, the geotechnical work has not been completed. Some of the references cited were not actually posted at the time that the review began. The citation from the review materials regarding geotechnical work 5 is still not available as of July 8. BOEM ignored requests for the documents submitted at the beginning of the review period. Even more ridiculous is the inclusion of documents with dates in the future as references supporting the review. For the information about geotechnical concerns in Indian River, these two reports are listed though not actually available. Note that one of them has a date next fall. The offshore sediment transport modeling also is not provided. The geotechnical reports available suggest that the existing data are flawed and not consistent. A 2020 report tries to string together data from different surveys from different methods but the results seem to be guesses more than scientifically derived results.<br>The contractor also acknowledges the geological complexity of the region as a result of past events, proximity to the Delaware River drainage, and to the areas surrounding the least being highly affected by storms (“storm dominated”). The accelerating pace and intensity of hurricanes predicted for the Atlantic coast 7, both in frequency and intensity, should be examined and factored into this analysis.<br>Major concerns include the potential for movements of sediment causing scouring of the platforms and uprooting of the cables located under the subsurface. The statements from US Wind have been disingenuous at best, promising the public that everything will be put into tunnels 60 or 80 feet below the surface, but this does not seem to be supported by the actual reports. Moreover, it appears that the technology to drill such tunnels through the area of the Mid Atlantic offshore and then under the barrier islands systems to somehow connect through Indian River Inlet, also an extremely scoured system with high currents, does not seem to exist.<br>In the Environmental Impact Statement, these issues need a fully airing and credible assessment from qualified and unbiased scientists who do not work for the project proponent. The Geotechnical Elements are Poorly Linked to the Designs Leaving Questions about Viability |
| BOEM-2022-0025-EMAIL-275-839 | Michael Pentony | Federal agency | NMFS | Benthic Resources | The lack of detailed habitat data in the COP substantially limits our ability to provide technical and site-specific recommendations for consideration as you develop the EIS and project alternatives. Based upon the limited and preliminary habitat information that is provided in the COP, complex habitats (e.g., rocky habitats, sand ridge complexes) occur throughout the lease area and along the offshore cable export cable corridor. Complex habitats are particularly vulnerable to project development activities and impacts to these habitats may be long-term or even permanent. The nearshore and estuarine portions of the project, specifically Indian River Inlet and Indian River Bay, provide habitat for a wide variety of commercially, recreationally, and economically important species of fish and shellfish. These areas also provide a migratory pathway, spawning, nursery, and forage habitat for diadromous species including alewife, blueback herring, striped bass, and catadromous American eel. We are particularly concerned about the planned export cable crossings through these ecologically important estuarine habitats. Based upon the limited information on the inshore export cable alignments provided in the COP, it appears that there are upland alternatives to the proposed estuarine crossings of the export cable. These upland alternatives should be fully explored in the EIS as they would avoid adverse impacts to the aquatic resources of the Indian River complex. |
| BOEM-2022-0025-EMAIL-275-865 | Michael Pentony | Federal agency | NMFS | Benthic Resources | The ecological impacts resulting from the loss of seabed and the associated benthic communities and forage base should also be evaluated. This should include a discussion of the ecological and economic impacts associated with habitat conversion from the installation of WTGs, offshore substations, cables, and scour protection. Analysis of habitat conversion should include site-specific benthic data collection and an evaluation of project impacts on different habitat types and on fisheries resources that rely on them. Consequences of biological resource surveys, including the potential for capture and collection of protected species, must also be considered. Impacts associated with decommissioning of the project should also be included, with details on how decommissioning would occur and the environmental consequences associated with project removal. The assessment of these impacts should be completed at scales relevant to each impact type to enable meaningful comparisons between alternatives. |
| BOEM-2022-0025-EMAIL-275-885 | Michael Pentony | Federal agency | NMFS | Benthic Resources | It appears the COP does not address the potential for additional scour protection that may be required to address depressions left by spuds/jack-up vessels used for pile installation - potentially further increasing the area of scour protection - a situation that has occurred in the two-turbine Research Lease located in Virginia. This issue should be fully addressed and integrated into the habitat minimization alternative (or scour protection sub-alternative). |
| BOEM-2022-0025-EMAIL-276-895 | Jonathan Meade | Federal agency | NPS | Benthic Resources | NPS coastal parks sometimes include offshore waters. In the case of Assateague NS, the boundary for the Park is 0.5 miles offshore along the entire length of the island. Nearshore benthic and water quality conditions vary across the project area (which we define as including possible cable locations leading to onshore connections). Different biota, including rare, sensitive, or commercially important species, may be found on the seafloor depending on bathymetric and benthic habitat conditions. It is important to protect those areas and natural processes that are still largely intact and to minimize additional disruption of geologic processes and sediment transport in areas already impacted. NPS can provide benthic habitat maps that have been developed for Assateague NS. This data may be useful to assist in desktop surveys during study of any nearshore development. Like the adjacent shoreline, nearshore benthic habitats in the mid-Atlantic region have been impacted by changes associated with climate change, including increased storm surge activities, and bottom and shallow water hazards may have increased or otherwise changed since previous survey activities. As a result, additional surveys are recommended as part of the project planning process. |
| BOEM-2022-0025-EMAIL-277-910 | Stepan Nevshehirlian | Federal agency | EPA | Benthic Resources | A number of studies have been conducted or are ongoing at the site. Fully incorporating site-specific data and analyses, such as detailed benthic mapping data, would inform the alternatives, assessment of resource impacts, and avoidance of sensitive resources. Detailed information should allow the reader to understand the impacts associated with the specific layout and siting of WTGs, OSS, the Met Tower, and cable routes and show where changes to the Project may avoid or minimize impacts to resources.<br>•As detailed in the COP, many seafloor features and bedforms are present in the Lease Area, including prominent ridges and smaller swales and sand ripples, waves, and dunes as well as gravel and cobble-dominated substrates. We recommend that the EIS address how the installation of structures and scour protection is likely to impact complex habitats and consider ways such impacts could be minimized.<br>•The EIS would benefit from identifying additional studies that are planned or underway. We recommend coordination with applicable agencies and providing preliminary methods, results, and/or reports of environmental studies prior to release of the draft EIS to ensure that any concerns regarding methodologies or data collection are addressed early in the process. |
| BOEM-2022-0025-EMAIL-277-912 | Stepan Nevshehirlian | Federal agency | EPA | Benthic Resources | As described, the introduction of the WTG and OSS structures will create an artificial reef condition and installation of scour protection for the foundations and cable protection will also convert existing benthic habitat. These impacts may extend beyond the footprint of the Lease Area. Therefore, it is critical that the EIS fully evaluate the potential impacts on resident and migratory species and community assemblages.<br>•The EIS should fully evaluate the expected shifts in biological communities and food webs that may be caused throughout and beyond the Lease Area and cable areas. The proposed scour protection will render currently softbottom or cobble/gravel habitats unavailable while the WTG and OSS foundations may attract species that prefer structures, including predators such as black sea bass (Centropristis striata). Likewise, a change in benthic organisms such as polychaetes and mollusks could impact pelagic fish assemblages.<br>•Volume II (Section 1.3) currently estimates the maximum potential disturbance to the seafloor from scour and cable protection is 126.4 acres. We recommend the EIS evaluate how scour and cable protection extent and effects could be minimized, including types of protection that may reduce adverse impacts.<br>•We recommend that the EIS address long-term impacts on benthic and demersal communities from habitat conversion, including any anticipated monitoring, adaptive management, or restoration measures.<br>The EIS would benefit from a full assessment of whether Project components are likely to introduce or encourage the spread of invasive or aggressive species. As part of this discussion, we recommend evaluating whether the introduction of structures and creating a patchwork of hard bottom habitats promotes the colonization of invasive species. We also recommend assessing the potential for invasive species to be brought in to or taken from the Project area on materials or on/in vessels. |
| BOEM-2022-0025-TRANS-24-87 | Henry Farkas | Individual | None | Benthic Resources | Now, I'd like to address the issue of the underwater parts of the wind turbines. And I'd like to suggest that just banging in a mono pile base is nice, but if you carefully design that monopoly base so that the underwater parts of it support monopoly base so that the underwater parts of it support marine fishery environment, you might actually create a coral reef not a coral reef, but some sort of a marine environment where lots of fishes can live. That would actually increase the ability of people to use that area as a place to go sport fishing. And it would also possibly even increase the amount of fish in the ocean because a lot of fish that live in the deep ocean spawn in the shallow parts of the ocean. Where the place for their little fishy offspring to hide from other fish that might eat them? |

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| BOEM-2022-0025-TRANS-26-94 | Peggy Schultz | Non-governmental organization | Power People for Offshore Wind Energy Resources | Benthic Resources | And that brings us to Scouring. When you go to Rehoboth and stand at the shoreline and bare feet, you'll feel the water swirl around your feet, and within seconds, much of the sand touching your feet will just wash away. This is scouring. If you were a wind turbine 20 miles The Nature Conservancy sees this Scouring phenomenon as an opportunity for enhancing fish life and plant life near the turbines, and have come up with a list of materials in addition to, or sometimes instead of the rocks that they find will attract marine life. And of course, these sea creatures in plant life would serve as food for the fish that the commercial fishermen and the sport fishermen want to catch. but in the ocean, the water would do the same thing. To avoid much of the scouring, engineers have worked out a solution that includes first removing the surface rocks, then putting down a layer of gravel, pounding in a monopile, and then piling up some big rocks around the base. |
| BOEM-2022-0025-TRANS-3-12 | Susan Dent | Individual | None | Benthic Resources | And then also, as far as making sure in the Environmental Assessment Statement, which I was surprised that it was not a full EIA, but there are some concerns with the underwater foundation structures and the impacts of the underwater currents. As far as sand migration, we've spent a lot of efforts in the past few years with dredging and dredging activities and sand migration and feel that we've done a very good job of coming back from and I don't know if a lot of people on this phone call remember some of the disappearing beaches of Ocean City, but if the Sam migration study has been completed for this development, just to make sure that we don't negatively impact those other efforts, I look forward to that being included in the Environmental Impact Statement. |
| BOEM-2022-0025-TRANS-40-139 | Bill Berry | Individual | None | Benthic Resources | In terms of the Environmental Impact Statement, I guess one of my concerns is whether we're going to be able to look at the effect of the vibration from these wind turbine generators on the aquatic organisms that live below them and the changes. |
| BOEM-2022-0025-TRANS-61-205 | Dolores Greenwich | Individual | None | Benthic Resources | And then coming up the ending bay, that's also going to affect that environment. But I think Ocean City has some real concern. |
| BOEM-2022-0025-DRAFT-0004-214 | Margaret Winters | Individual | None | Birds | The potential impact of greatest concern is to marine and avian life, which should be considered the highest priority in design, construction and maintenance. |
| BOEM-2022-0025-DRAFT-0023-254 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Birds | It is difficult to count dead birds and bats that fall in the ocean, but it is known onshore turbines kill large numbers of birds and bats each year and it appears likely offshore turbines will also kill birds and bats according to the COP. Since the COP admits bird kills are unknowable the only appropriate mitigation is to stop the turbines during the migration season. |
| BOEM-2022-0025-DRAFT-0046-297 | Victoria Venable | Non-governmental organization | Chesapeake Climate Action Network | Birds | However, offshore wind farms have far fewer bird strikes due to limited bird species inhabiting the surrounding area.33 Birds will instead benefit from the wind farm's artificial reef and increased biodiversity and food availability within the area.34 In fact, several studies have quantified the estimated rate of impact of the proposed wind farm on bird mortality, finding wind farms have a lower mortality rate than fossil fuel-induced climate change and other anthropogenic factors.35 A 2009 study by Benjamin Sovacool, a Danish professor specializing in energy technologies, found that fossil-fuel based power stations cause 5.2 bird fatalities per Gigawatt-hour, whereas on-land wind farms produce between 0.3-0.4 fatalities per Gigawatt-hour.36 Studies found that few species fly far enough from the coast where the wind farm could interfere with their normal flight pattern.37 Another important consideration regarding the proposed US Wind farm is its location within the Atlantic Flyway, which is the migration flight pattern used by species of birds along the East Coast.38 Research found that some strikes may occur for birds using the Atlantic Flyway for migration, but they can also benefit by using the wind farm's reefs to forage.39 |
| BOEM-2022-0025-DRAFT-0047-304 | Rose Mary Hoy | Individual | None | Birds | The impact on migratory bird pathways will result in bird kills of unknown proportions. |
| BOEM-2022-0025-DRAFT-0052-317 | Megan Staczek | Individual | None | Birds | The impact on migratory bird pathways will result in bird kills of unknown proportions. |
| BOEM-2022-0025-DRAFT-0171-664 | Pam Pridgeon | Individual | None | Birds | The OSW Farms will have a devastating effect on the more than 1,500,000 Birds using the Atlantic Flyway on their seasonal migrations from South America to the Artic nesting grounds for the Northern Hemispheres' summer and return to South America for the Southern Hemispheres' summer months. A very important replenishment area along the Delaware Coast and Delaware Bay area will be negatively impacted by these Windfarms. https://web.stanford.edu/group/stanfordbirds/text/essays/Shorbird Migration.html<br>Monarch Butterflies make their passage across the Delaware Bay on their annual migration to warmer climates.<br>https://www.njtvonline.org/news/video/monarch-butterflies-begin-annual-migration-from-cape-may-to-mexico/ |
| BOEM-2022-0025-DRAFT-0184-699 | Jennifer Holmes | State agency | Delaware Department of Natural Resources and Environmental Control | Birds | Research, long-term monitoring, and adaptive management plans are important to safeguard birds. As BOEM's evaluation of the Proposed Action moves forward, the DNREC recommends conducting research to determine impacts to coastal and marsh birds and working with biologists to prepare minimization/mitigation plans to reduce avian impacts. Please refer to examples of research and planning as stated in the section on bats. |
| BOEM-2022-0025-DRAFT-0204-766 | Stephani Ballard Wagner | Individual | None | Birds | • US Wind also admits that bird kills, including of the endangered Red Knot, occur from the wind turbines (each of which sweeps an area the size 10 football fields with blade tip speeds up to 180 mph), but it does not provide any meaningful data on bird kills. It is known that many shorebirds migrate at night, at a time when the turbines may not be visible at all to them, and could prove deadly.<br>• Even if birds are not directly killed, the site may cause changes in migratory patterns, potentially disrupting food chains along the coast. |
| BOEM-2022-0025-DRAFT-0205-790 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Birds | The Draft EIS must address potential population level, cumulative impacts65 to these avian populations from developing the Project and other offshore wind development expected in the reasonably foreseeable future. In the Draft EIS, BOEM must consider impacts to a broad range of avian species which may be impacted by the Project, not limited to ESA-listed species. Federally endangered species which have International Union for Conservation of Nature (IUCN) status include the piping plover, the red knot, and the roseate tern. Several species are Maryland State endangered or threatened species as well as IUCN listed, including the common tern, gull-billed tern, mourning warbler, least tern, and the black skimmer, which is also a U.S. Fish and Wildlife Service (USFWS) Bird of Conservation Concern. Wilson's plover and royal tern are also Maryland State endangered species, and the Forsters' tern is Maryland State listed as "in need of conservation". USFWS Birds of Conservation Concern include the American oystercatcher, whimbrel, hudsonian godwit, ruddy turnstone, dunlin, purple sandpiper, pectoral sandpiper, semipalmated sandpiper, short-billed dowitcher, lesser yellowlegs, and willet. The Bicknell's thrush, which is IUCN vulnerable, is a nearctic-neotropical migrant of highest conservation concern, with rare occurrence in the Project area during migration. The blackpoll warbler is IUCN near threatened and is commonly observed during migration in Ocean City. Twenty-seven offshore species were detected in the Project area using digital aerial surveys and ship-based surveys; 47 offshore species have been identified as occurring in the OCS-A-0490 lease area.66 Offshore birds include the following five species that will be potentially impacted by the Project: northern gannet, black scoter, common loon, red-throated loon, and white-winged scoter.67 Importantly, although the black-capped petrel is listed as a "species of interest" in the COP,68 it is proposed for listing under the ESA as threatened and may be impacted by offshore development, especially in deeper water nearer the continental shelf edge. The following sections review other obligations of BOEM and US Wind with respect to avian species. Importantly, BOEM should acknowledge its obligations under the Migratory Bird Treaty Act (MBTA). Recognizing that much remains unknown regarding the impacts of offshore wind to avian species in the United States, BOEM must require an explicitly defined monitoring and adaptive management plan and use the best available science. This must include a requirement for sufficient standardized monitoring before and after construction, consistent with recommendations that emerge from the Regional Wildlife Science Collaborative (previously called the Regional Wildlife Science Entity). |
| BOEM-2022-0025-DRAFT-0205-791 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Birds | It is notable that the COP, including the Avian Risk Assessment (Appendix N1), and the Avian Monitoring Plan (Appendix N2), do not acknowledge the responsibilities of BOEM and US Wind under the MBTA and the illegality of incidental take. Since 2017 the Department of the Interior (DOI) and USFWS were relying on a new rule69 which codified an illegal interpretation of the MBTA and limited its scope to the purposeful take of birds.70 As of October 4, 2021, the Service published a final rule revoking the January 7, 2021 regulation, returning to the original interpretation of the MBTA, which prohibits incidental take. The final rule went into effect on December 3, 2021.71 |
| BOEM-2022-0025-DRAFT-0205-792 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Birds | Moreover, although some inferences about collision risks might be extended validly from European studies81 to similar or identical North American birds, the US Wind project location overlaps with ranges of certain procellariiform birds (e.g., shearwaters) for which we have no impact data from anywhere. Finally, bird counts and flight height data are usually insufficient in quantity and quality for precise estimation of seasonal variation, age structure, and differences in age-related activities of species affected by turbine collision.82 Therefore, there is a need for long-term monitoring to understand not only risk of collision but also permanent population-level effects of potential impacts to avian populations. |

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| BOEM-2022-0025-DRAFT-0205-794 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Birds | BOEM should call for incorporation of best monitoring and management practices into a regional adaptive management plan to adequately measure and mitigate cumulative impacts to birds from offshore wind developments expected across the Atlantic OCS for the reasonably foreseeable future. The US Wind COP acknowledges that detection of avian nocturnal migrants is lacking in their survey protocol. The MABS research, used by US Wind to assess avian risk, piloted an acoustic detection study in 2012-2014 for a total of 7 days. While an important survey effort, this work is insufficient to inform long-term monitoring and comprehensive mitigation for the Project.84 Furthermore, reliance upon pre-construction acoustic surveys to determine whether post-construction monitoring is necessary for nocturnal migrants is cause for concern. We recommend adding additional methodologies, i.e., Nexrad weather radar to help detect nocturnal migrants within the lease area. Weather surveillance radars WSR-88D (NEXRAD) are being increasingly incorporated into biological studies of migration patterns and movements (Bridge et al. 2011).85 Cornell University's BirdCast maps show real time intensities of actual nocturnal bird migration as detected by the US weather surveillance radar network between local sunset to sunrise. Rather than rely on the pre-construction acoustic data to determine the need for post-construction avian monitoring, US Wind should develop an avian monitoring plan that includes a commitment to integrate strike detection technology, as it becomes commercially available and feasible to install offshore (further discussed below with regards to bats). We also encourage US Wind to consider expanding their monitoring methodology to include marine/weather radar and install a Motus sensor array that would detect both birds and bats in the project area as soon as technically feasible and support nano-tagging of bird and bats to better understand use of the lease area. The monitoring plan does not mention placement of the FLiDar buoy, yet placement of such buoys is critical because the Motus antenna has a limitation of 15 km and avian microphone systems (typically 3 microphones used to triangulate calls) are highly variable depending upon the system used (range of 90m to 0.01 km2) and species they are designed to detect. |
| BOEM-2022-0025-DRAFT-0212-821 | Amy Kyle | Individual | None | Birds | Migratory birds are particularly vulnerable to multiple pressures and are already experiencing declining populations in many cases. Rather than mitigate effects, the most effective actions are to avoid siting offshore wind in areas that will interfere with migratory migration, as attempts to change bird pathways are less effective, and avoidance behavior may have its own adverse effects. |
| BOEM-2022-0025-EMAIL-276-893 | Jonathan Meade | Federal agency | NPS | Birds | Stone Harbor Bird Sanctuary is a 21-acre nature preserve located in Stone Harbor, Cape May County, New Jersey. The Sanctuary is municipally owned by the Borough of Stone Harbor. The remnant piece of barrier beach illustrates a habitat that once covered the Cape May peninsula, providing a preserved microcosm of what the New Jersey barrier islands looked like hundreds of years ago. The sanctuary supports a diversity of bird life, most notably herons, and holds great scenic and educational value for Stone Harbor residents and visitors. Designated a NNL in 1965, it was the first of 11 sites to be designated in NJ, and among the earliest designations nationwide. NPS can assist in providing contact information for Stone Harbor managers so that potential impacts on sanctuary birds can be evaluated. |
| BOEM-2022-0025-EMAIL-276-902 | Jonathan Meade | Federal agency | NPS | Birds | NPS has concerns about potential impacts to nesting shorebirds and migratory birds, particularly rare and endangered species that make their way up and down the Atlantic flyway and stop at National Seashores to nest, forage, and rest. Assateague Island NS provides important stopover and breeding sites for federally listed and migratory bird species, including piping plovers (Charadrius melodus), rufa red knots (Calidris canutus rufa), and Wilson's plovers (Charadrius wilsonia). The USFWS has also proposed critical habitat for the red knot at Assateague Island NS. All National Seashores have management plans specifically design to protect these avian species, and we are concerned that the arrays of turbines could impact these species as they migrate, thereby impacting management and recovery efforts underway. We recommend a literature review and modeling study to simulate the migration of avian species along their migratory pathways. Specifically, that study should focus on species such as the piping plover and rufa red knot. In recent years, coastal habitat throughout the region has been degraded through increased storm frequency and intensity along the coast as well as sea level rise. Furthermore, climate change has altered the timing of migration and reduced breeding windows for those species that nest within National Park System units. NPS is concerned that the US Wind project and other offshore wind projects in the area may contribute to cumulative effects on rare and imperiled bird species (both listed species and migratory birds), which could jeopardize recovery activities occurring within NPS units and throughout the region. NPS requests that BOEM evaluate those cumulative effects on protected species, including the other area offshore wind projects at various stages of planning and development. |
| BOEM-2022-0025-TRANS-13-44 | Mary Douglas | Individual | Private Practice, former EPA | Birds | US Wind has committed to taking all available measures to protect bird and marine life from the impacts of its turbines. I'll focus primarily on measures to protect migratory birds. The construction and operation plan includes an avian risk assessment and a bird monitoring plan. BOEMs EIS will presumably build on these. And we just heard tonight about the digital Aerial Avian survey from Laurie of US Wind. The sighting of the lease area of eleven to 27 miles from shore also takes into account that migratory songbirds generally do not fly further than 10 miles from shore. US Wind also says the bird species present in the lease area tend to fly low over the water outside the turbine blade circumference. |
| BOEM-2022-0025-TRANS-13-45 | Mary Douglas | Individual | Private Practice, former EPA | Birds | The construction and operation plan includes an avian risk assessment and a bird monitoring plan. I'll focus primarily on measures to protect migratory birds. The construction and operation plan includes an avian risk assessment and a bird monitoring plan. BOEMs EIS will presumably build on these. And we just heard tonight about the digital Aerial Avian survey from Laurie of US Wind. The sighting of the lease area of eleven to 27 miles from shore also takes into account that migratory songbirds generally do not fly further than 10 miles from shore. US Wind also says the bird species present in the lease area tend to fly low over the water outside the turbine blade circumference. And last March, US Wind announced that it was giving the generous sum of $11 million to the University of Maryland Center for Environmental Science. There are, however, a total of 17 offshore wind projects in different stages of development on the Atlantic coast, many of them massive in size. |
| BOEM-2022-0025-TRANS-18-62 | Bill Peel | Non-governmental organization | Calver Citizens for a Healthy Community | Birds | I agree with the speakers who all said that we do need to take into account the impact it will have Impact, these windmills can and do cause disturbineces to the environment. But I want to point out with respect to birds, for instance, many times I drive down the road in my car, birds are standing right alongside my car as I whiz by at 55 miles an hour. And they seem to know the difference between a car and safety over here on the shoulder. I think birds with the proper insights into letting them know, tapping them on the shoulder, if you will, can be helped to stay away from these large windmills. |
| BOEM-2022-0025-TRANS-2-5 | Russell Kovach | Individual | None | Birds | Climate change aside, there's research that shows that countless ocean going birds are killed every year by things like heavy metal pollution, which are released by power plants. |
| BOEM-2022-0025-TRANS-35-119 | Kathy Phillips | Individual | None | Birds | So I would request that BOEM continue to protect open areas of ocean in between wind farm leases to allow migratory birds to find their way around the structures and have unobstructed access to the shoreline habitat areas for their own rest and sustenance during their migration. |
| BOEM-2022-0025-TRANS-36-128 | Dave Arndt | Individual | None | Birds | If you think about birds, the European experience is and has been well documented is that birds learn to go around the turbines and around the wind farms themselves completely. |
| BOEM-2022-0025-TRANS-60-199 | Venkat Subramanian | Individual | None | Birds | One is the whole impact on the flying birds baths, the marine mammals and the marine life in general, particularly with this project coming up, the impact on the habitat displacement and any exposure to the electromagnetic field and things of that nature. |
| BOEM-2022-0025-DRAFT-0002-211 | J L | Individual | None | Climate Change | It will also have long-term benefits in slowing climate change and related rising sea levels, which will be a catastrophe for coastal states like Maryland. |
| BOEM-2022-0025-DRAFT-0005-216 | Anonymous Anonymous 1 | Individual | None | Climate Change | We need to use renewable energy sources that do not contribute to further climate change to keep the planet habitable for our children and grandchildren. I fully support this project. |
| BOEM-2022-0025-DRAFT-0008-219 | John Irvine | Individual | None | Climate Change | As a lifelong Maryland resident, and frequent visitor to the Maryland and Delaware shores, I believe the long-term benefits of this project far outweigh any short-term, local negative impacts. Rising greenhouse emissions and the resulting impact on climate, seal level rise, biodiversity, and the future overall inhabitability of the planet is a far greater threat to people and other living things than are the relatively minor downsides of this project. As a US citizen I am also shocked at how far behind the rest of the industrialized world in tackling the climate crisis. This initiative is a great step in the right direction. |
| BOEM-2022-0025-DRAFT-0013-229 | Charles Meneveau | Individual | None | Climate Change | And, the benefits of phasing out fuel-based electricity will be enormous, global and local (better air, less greenhouse gas emissions, etc). I should add that as Baltimore homeowner, we now subscribe to 100% wind energy electricity option from our provider. However, they need to get those wind energy contributions mostly from out of state wind farms (PA, midwest etc). It would be good to have substantially more MD-based generation. Finally, while there will be minor environmental impacts during construction (noise from pilon installation etc) in the long run these minor negatives are greatly dwarfed by the environmental positives of wind power. People now complaining about the view will not even notice and will ultimately benefit when their properties will not flood and be destroyed since global warming can be slowed with rapid transition to wind and solar for our electricity. |

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| BOEM-2022-0025-DRAFT-0019-235 | Delaware Interfaith Power & Light | Non-governmental organization | Delaware Interfaith Power & Light | Climate Change | My name is Shweta Arya and I am commenting on behalf of Delaware Interfaith Power & Light, a faith based environmental nonprofit, we mobilize and inspire our faith communities to provide a moral response to climate change. We believe we are in a rapidly accelerating climate emergency and to avert any further human suffering from the climate catastrophies, we must get to a net-zero future, we must rapidly transition to clean sources of energy at the earliest. And this is why we whole heartedly support US Wind Project for MD and we hope that in the near future Delaware can have it's own Offshore Wind Project. |
| BOEM-2022-0025-DRAFT-0024-259 | Pamela Winston | Individual | None | Climate Change | As we are all well aware, our country and our state are already suffering the effects of climate change, and it will only get worse over time. We are long overdue in addressing climate change in the serious and sustained way it requires.<br>Maryland is coming from behind in doing its part to move its electrical grid to clean, renewable energy sources. This offshore wind project gives us the chance to remedy this.<br>This proposal to invest in large-scale offshore wind power can help Maryland become a clean energy, economic powerhouse. Embracing the power of offshore wind will create a modern clean-energy economy for Maryland, and provide us with thousands of new well-paying jobs. |
| BOEM-2022-0025-DRAFT-0027-265 | Amy Kyle | Individual | None | Climate Change | I agree that we need new clean energy sources including solar and wind. I support strong action to address climate change. But we need to develop solutions in a smart way that minimizes impacts on other resources and communities. The magnitude of the climate challenge should not be used as an excuse to thoughtlessly lay waste to other economies, ecosystems, and populations. Lots of unnecessary damage has been done to natural and human resources by projects that are viewed only with regard to a single objective. We look back now on, for example, certain urban renewal or hydro projects and ask -- how could they have been so short sighted as to do this? Let's not do this again here. |
| BOEM-2022-0025-DRAFT-0028-266 | Joseph Jankowski | Individual | None | Climate Change | I support the wind energy facility offshore from Ocean City. Those opposed argue that the pristine view would be destroyed by the wind turbines. Those opposed allow billboard boats within one hundred feet of the beach, banner planes above the beach and numerous other commercial watercraft to regularly obscure the view. These enterprises add to global warming unlike the wind turbines which help reduce global warming. These objections are short-sighted and should be rejected. Global warming is a problem which should be addressed now in as many ways as possible. I live within 5 miles of the beach and am in jeopardy from sea level rise. |
| BOEM-2022-0025-DRAFT-0033-272 | Janet Redman | Individual | None | Climate Change | I learned that we know the science AND the solutions to climate change! Renewable energy must replace our oil and gas-powered world, for our health and that of future generations.<br>The oceans are a large carbon sink, meaning they hold onto carbon, preventing it from escaping to the atmosphere where it has a warming effect. And humans have compromised these oceans through drilling, oil spills, pollution and overfishing. Now, we have an opportunity to do good by installing an offshore wind farm near the MD/DE coast with the capacity to power over 300,000 homes, more than twice the number in Sussex County, DE (https://www.census.gov/quickfacts/sussexcountydelaware). |
| BOEM-2022-0025-DRAFT-0041-283 | Diane Hanson | Individual | None | Climate Change | Flooding is always a concern in Sussex County, including along the inland bays. And it's getting worse. Even tidal surges have become problematic. It could eventually get bad enough to compromise drinking water, septic fields, and farmland. That's why it is important to take preventive measures now.<br>Sea level rise is the driver behind the flooding and offshore wind is one of the ways to help prevent such disastrous outcomes. |
| BOEM-2022-0025-DRAFT-0073-360 | Jodi Rose, Albert Todd | Non-governmental organization | Interfaith Partners for the Chesapeake | Climate Change | Thus, addressing the climate crisis is one that demands our strong and immediate attention given this moral call to care for the earth and all web of life within. Offshore wind projects, like the proposed project in question, are an important part of our response to this crisis. Energy solutions are climate solutions. Climate solutions are health solutions. Health solutions profoundly benefit human dignity and create communities that will thrive. As people of faith, we have no greater call to action than to create a future whereby people are dignified with a stable climate and<br>reliable jobs. We are facing an existential crisis with climate change, and the importance of the "view off the beach" pales in comparison to the importance of addressing the most challenging issue of our lifetime with the strength of character needed to leave a better future for the next generation.<br>On behalf of our membership and faith communities throughout the 64,000 square mile Chesapeake Bay watershed, we urge BOEM to accept the wind power construction application so work may begin on this very important climate solution. |
| BOEM-2022-0025-EMAIL-274-835 | Sam Salustro | Non-governmental organization | Business Network for Offshore Wind | Climate Change | US Wind's projects will contribute to the wider national and global efforts to mitigate climate change. A recent IPCC Report found that immediate, rapid and large-scale reductions in greenhouse emissions are necessary to limit warming to 1.5°C or even 2°C. With every seemingly small temperature increase, changes in extremes continue to become larger. Every additional 0.5°C of warming causes increases in the intensity and frequency of hot extremes, including heatwaves, heavy precipitation and agricultural and ecological droughts in some regions, according to the report. |
| BOEM-2022-0025-TRANS-12-37 | Anna Fagan | Non-governmental organization | Delaware Center for the Inland Bays | Climate Change | Climate change is an existential threat to the communities around the Inland Bay. We call it the CCMP, this document outlines agreed upon goals and objectives that help to guide the center and its partners to restore the inland base. And an important focus of the CCMP is to support offshore wind and other renewable energy sources that will aid in mitigating the impacts of climate change on the Inland Bays. It presents overwhelming environmental stressors that threaten the achievement of our water quality and habitat restoration goals. The Inland Bay's watershed is extremely vulnerable to the impacts of climate change due to its close proximity to sea level and the natural susceptibility of the bays to pollution and hydrologic changes. The impacts of climate change on the Inland Bays are being realized now and they're rapidly increasing. They include, but are not limited to, degradation and loss of vital habitats, increased nutrient pollution, increased intensity and frequency of coastal storms and erosion, increased sea level rise, increased heat that prevents restoration of important watershed ecosystems such as wetlands, forests and underwater bay grasses. |
| BOEM-2022-0025-TRANS-12-38 | Anna Fagan | Non-governmental organization | Delaware Center for the Inland Bays | Climate Change | Rapid transition to renewable energy sources is necessary to reduce greenhouse gas emissions to levels that will avoid the worst impacts of climate change on the Inland Bays and its surrounding communities. The goal for net zero greenhouse gas emissions by the year 2050 is so challenging that we have to take all of the above approach to reducing emissions and offshore wind is front and center in that strategy for the East Coast. As such, the center supports the federal initiative to develop 30 gigawatts of offshore wind in the US. While protecting biodiversity and promoting ocean Co use. Again, this is consistent with our 2021 CCMP. |
| BOEM-2022-0025-TRANS-13-43 | Mary Douglas | Individual | Private Practice, former EPA | Climate Change | All states need to take immediate actions to reduce greenhouse gas emissions. All states need to take immediate actions to reduce greenhouse gas emissions. We in the Atlantic Coast states have an easy choice. Our strong and abundant offshore wind can make a significant contribution towards reducing the disastrous impacts of climate change. According to the Audubon Society, global warming poses an existential threat to two thirds of North American bird species, two thirds. Last year alone, the US Fish and Wildlife Service declared 23 bird and other animal species extinct. Offshore wind projects, like US Wind will eventually cool down the planet and give endangered species a chance to survive. |
| BOEM-2022-0025-TRANS-18-59 | Bill Peel | Non-governmental organization | Calver Citizens for a Healthy Community | Climate Change | Climate change, we all know its impacts and what's happening. The fossil fuel industry is at the basis of that.<br>The amount of CO2 going into the air is increasing all the time. |
| BOEM-2022-0025-TRANS-23-78 | Natasha Finnegan | Individual | None | Climate Change | I live in Salisbury and I am very aware of the impacts of global warming on the Del Marva Peninsula, like rising tides and groundwater endangerment and strengthened hurricanes. I want everyone to keep in mind that Ocean City was created by a hurricane, and it can just as easily be wiped out by one. I see the tides getting higher and higher, and they're endangering my friends homes. |
| BOEM-2022-0025-TRANS-25-88 | Larry Ryan | Non-governmental organization | Delaware Chapter of the Evangelical Lutheran Church in America Creation Care | Climate Change | As a member of the Delaware Maryland Center ELCA that's the Evangelical Lutheran Church in America Creation Care Ministry team, and as a member of the St. Peters Lutheran Church in Ocean City, Maryland, I speak to you today about the urgency to adopt the US. Wind offshore project as rapidly as possible. I learned about this urgent need as an attendee as an ELCA Delegate at the Top 26 Worldwide Climate Conference in Glasgow, Scotland in November. This past November, as greenhouse gas emissions surpass what the known environment will tolerate, food safety, civic and economic life are at risk everywhere. Earth's atmospheric soils and seas are not subdivided by national boundaries. The human community must now rapidly develop and deploy policies that can diminish the catastrophes occurring regularly all around us. The cost of attending to climate disaster already exceeds the cost of policy adjustment. That calculation only gets worse. From now on, we're financing the fixes of what our current energy regime is destroying. |
| BOEM-2022-0025-TRANS-25-90 | Larry Ryan | Non-governmental organization | Delaware Chapter of the Evangelical Lutheran Church in America Creation Care | Climate Change | We support hedging our risk for communities and locations vulnerable to the deleterious climate effects plainly observable. We support hedging our risk for communities and locations vulnerable to the deleterious climate effects plainly observable. |

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| BOEM-2022-0025-TRANS-25-91 | Larry Ryan | Non-governmental organization | Delaware Chapter of the Evangelical Lutheran Church in America Creation Care | Climate Change | We also support more restrictive allowances for greenhouse gas emissions because the time to transition to a different energy regime is nearly up. |
| BOEM-2022-0025-TRANS-26-97 | Peggy Schultz | Non-governmental organization | Power People for Offshore Wind Energy Resources | Climate Change | Near the end of our conversation, Mr. Clark said musingly that Delaware waters are getting warmer and that some of our fish are moving further north in order to live in the cooler waters in which they feel more comfortable. Warming waters are, of course, the result of climate change. And climate change is the existential threat we hope to at least partially forestall by replacing fossil fuel power generation with offshore wind turbines. |
| BOEM-2022-0025-TRANS-28-101 | Gerald Ehrenstein | Non-governmental organization | Montgomery County Faith Alliance for Climate Solutions | Climate Change | I'm a retired physicist, and as part of the physical community, we've known about this problem of the difficulty of the greenhouse gasses for more than 40 years, and so we now have opportunities to try to resolve some of them. I'm a member of a group called Mcfax Montgomery County Faith Alliance for Climate Solutions. This is a group of more than 50 congregations of various denominations who recognize that the problem about the greenhouse gas causing the climate change, that this problem is not only a problem for the economics of our society, but it's also a problem for the morality of it. We are obligated, we think, to leave a better place, or at least not a worse place for our children and grandchildren. And so we are very much concerned about this. |
| BOEM-2022-0025-TRANS-29-103 | Reba Carruth | Individual | None | Climate Change | I have learned a lot in the last year about the importance of climate resilience and environmental sustainability in the Chesapeake region. |
| BOEM-2022-0025-TRANS-31-110 | Coralie Pryde | Individual | None | Climate Change | We really know very clearly that this global warming is fueled mainly by burning fossil fuels, which creates carbon dioxide and also to an increasing extent to leak methane, which can have a very strong short term global warming effect. So it's very necessary that we transition away from fossil fuels. My understanding from the work of people at the University of Delaware is one of the best ways to ease that transition would be to set up a series or a large group of wind farms off the coast, on Atlantic Coast from Maine to Virginia. And those could be interconnected. We would have a very steady source of power that could greatly ease the transition from burning coal and fossil fuels. |
| BOEM-2022-0025-TRANS-35-117 | Kathy Phillips | Individual | None | Climate Change | First of all, the Del Marva Peninsula is one of the most sensitive areas on the East Coast regarding sea level rise. We have very vulnerable communities that live in low lying areas. We have a good deal of farmland that is being influenced by sea level rise. And of course, the bayside of the entire town of Ocean City is going to be impacted and is already being impacted by sea level rise and stronger storms due to climate change. |
| BOEM-2022-0025-TRANS-36-125 | Dave Arndt | Individual | None | Climate Change | The last time CO2 levels were this high, the sea level was 60ft higher. It's a good thing that sea level rise Lake Cot levels, otherwise a whole eastern shore of Maryland would be gone. |
| BOEM-2022-0025-TRANS-37-133 | Jenn Aiosa | Local agency | Baltimore County Executive | Climate Change | But we firmly believe that offshore wind can and should be accomplished in a way that minimizes any marine impacts and maximizes the positive impact associated with mitigating climate change. |
| BOEM-2022-0025-TRANS-4-14 | Roselie Bright | Individual | None | Climate Change | I would encourage that in any impact statement that I would encourage that in any impact statement that there'd be an analysis of what an equivalent amount of energy production through fossil fuels would cost in terms of environmental impact and the climate crisis. I don't want all the negatives to be put on wind. I'd like a comparison between the wind project and going with or continuing with fossil fuels for the equivalent amount of generation. |
| BOEM-2022-0025-TRANS-42-175 | William Steigelmann | Non-governmental organization | Environmental Trust, Salisbury | Climate Change | We need this power and we need the fact that it is clean power. The greenhouse gas emissions from power sources feeding power into Maryland and Delaware increased slightly after several years of steady decline. This is bad news for us, and this year may be a further increase.<br>Offshore wind installations are one of the few large new sources of power that have zero or very low greenhouse gas emissions and they can begin operating during the next ten years together with actions by all entities around the globe. We all need to do everything we can to reduce greenhouse gas emissions or our children will have a miserable time dealing with the effects of persistent high temperatures, high ocean water, high rain, fall, and high winds. |
| BOEM-2022-0025-TRANS-43-146 | Christopher Smitley | Non-governmental organization | IBEW Local union 126 | Climate Change | Like I said, I live right along the Indian River Inlet. I've watched these tide changes, these flooding, all these other things that are occurring here, and we would really appreciate this moving forward and getting completed. |
| BOEM-2022-0025-TRANS-44-147 | Pamela Costanzi | Individual | None | Climate Change | I am very passionate about climate change and doing anything we can to mitigate it and to stop the tide of how things are going in this country. I've been a hybrid car driver for more than 20 years in Pennsylvania. I've been a hybrid car driver for more than 20 years in Pennsylvania. When I had the choice where I lived recently. I had the choice over 15 years to pay extra to buy 100% renewable energy through my energy provider and I gladly did so. And more than 75% of that was provided by wind farms in central Pennsylvania. So I know that wind energy works. |
| BOEM-2022-0025-TRANS-55-183 | Dr. Ted Spickler | Individual | Climate Reality Project | Climate Change | We know that the increasing ocean temperature and the increasing acidity of the ocean is not good for the inhabitants of the ocean. And that's going to affect the whole stream of what fish eat, what things. And before you know it, we're not going to have anything left in the ocean. It's going to be dead. So get the communications going. Hundreds of pages of detailed biology are hard to read and it's hard to get out to everybody what it really says and what it really means. |
| BOEM-2022-0025-TRANS-9-143 | Charles Stegman | Non-governmental organization | Wacomico Environmental Trust | Climate Change | Over the course of these public comments, we have heard much about the effects of CO2 driven climate change on human welfare resulting in greater incidents of extreme weather events more frequent storm surge, flooding which affects us here on the Eastern Shore and increased risk of crop failures, which is also a big issue for us. One consequence of reliance on fossil fuel as an energy source that has received comparatively little attention, however, is the health impacts of pollutants, especially particulate matter emitted along with the CO2. Based on many peer reviewed articles over the past five years, combustion of fossil fuels contributes significantly to premature deaths worldwide. Based on many peer reviewed articles over the past five years, combustion of fossil fuels contributes significantly to premature deaths worldwide. One in five premature deaths is attributed to fossil fuel combustion, which causes air pollution primarily from generation of particulate matter in the two five micrometer range. Adults and children are both affected by these diseases, which include asthma, chronic obstructive pulmonary disease, or COPD, and lung cancer, to name just a few. By transitioning away from fossil fuel combustion to cleaner sources of power such as wind, we can make a positive impact on the public health burden of air pollution while mitigating climate change at the same time. |
| BOEM-2022-0025-TRANS-9-26 | Charles Stegman | Non-governmental organization | Wacomico Environmental Trust | Climate Change | And I'm a semi retired physician and what I'd like to add to the public comments is that particulate pollution from greenhouse gas emissions is responsible for one out of five deaths in the world and in the US because of greenhouse gas combustion. |
| BOEM-2022-0025-DRAFT-0017-233 | Bettina Rayfield | State Agency | Virginia Department of Environmental Quality | Coastal Zone Consistency | As you may know, the Department of Environmental Quality, through its Office of Environmental Impact Review (DEQ-OEIR), is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act (NEPA) and responding to appropriate federal officials on behalf of the Commonwealth. Similarly, DEQ-OEIR coordinates Virginia's review of federal consistency documents prepared pursuant to the Coastal Zone Management Act which applies to all federal activities which are reasonably likely to affect any land or water use or natural resources of Virginia's designated coastal resources management area must be consistent with the enforceable policies Virginia Coastal Zone Management (CZM) Program.<br>DOCUMENT SUBMISSIONS<br>In order to ensure an effective coordinated review of the environmental documents, notification should be sent directly to OEIR. We request that you submit one electronic to eir@deq.virginia.gov (25 MB maximum) or make the documents available for download at a website, file transfer protocol (ftp) site or the VITA LFT file share system (Requires an "invitation" for access. An invitation request should be sent to eir@deq.virginia.gov.).<br>The environmental documents should include U.S. Geological Survey topographic maps as part of their information. We strongly encourage you to issue shape files with the NEPA document. In addition, project details should be adequately described for the benefit of the reviewers. |
| BOEM-2022-0025-DRAFT-0004-215 | Margaret Winters | Individual | None | Commercial Fisheries and For-Hire Recreational Fishing | Impact to human commercial or recreational activities is secondary, and negatives here are outweighed by the benefits to our shared ecosphere from the creation of a sustainable clean energy source. |

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| BOEM-2022-0025-DRAFT-0011-224 | Edward Larkey | Individual | None | Commercial Fisheries and For-Hire Recreational Fishing | Steps must also be taken to ensure that commercial fishing is not negatively affected by the pylons, blades, and support structures for wind generators, and the commercial fishing industry, as a major stakeholder in the generation of wind energy, is consulted on how to best accommodate the needs of that industry. |
| BOEM-2022-0025-DRAFT-0023-256 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Commercial Fisheries and For-Hire Recreational Fishing | Commercial fishing will be abandoned in the lease area….<br>cumulative impact of 23 existing lease areas covers prime fishing grounds in an area the size of Connecticut. US Wind understates the impacts of commercial fisherman in the COP as lost fishing gear. The COP needs to be altered to add the information learned in the Vineyard Wind EIS, and needs to consider the cumulative impact of lost commercial fishing revenue, and the impact on US seafood stocks. A solution needs to be found for Coast Guard concerns about Search and Rescue limitations, and a solution is needed to how to determine “take” limits before the EIS process can begin. |
| BOEM-2022-0025-DRAFT-0035-275 | Kerrie Bunting | Local agency | Ocean Pines Chamber of Commerce | Commercial Fisheries and For-Hire Recreational Fishing | Artificial reef effect does not pertain to benthic species. Overwhelmingly, our local commercial fishermen harvest scallops, conch and whelk. Please site research you have done on these specific species. |
| BOEM-2022-0025-DRAFT-0047-301 | Rose Mary Hoy | Individual | None | Commercial Fisheries and For-Hire Recreational Fishing | My concerns are: Responsible research shows the proposed turbine construction will diminish commercial fishing for 30+ years, interfere with navigational radar and will cause “pre-agreed upon electric rates” to soar. |
| BOEM-2022-0025-DRAFT-0052-314 | Megan Staczek | Individual | None | Commercial Fisheries and For-Hire Recreational Fishing | My concerns are: Responsible research shows the proposed turbine construction will diminish commercial fishing for 30+ years, interfere with navigational radar and will cause “pre-agreed upon electric rates” to soar. |
| BOEM-2022-0025-DRAFT-0071-358 | Senator Mary Beth Carozza | State agency | Maryland State Senator District 38 | Commercial Fisheries and For-Hire Recreational Fishing | I remain extremely concerned about the impact of the offshore wind project on commercial fishing operations, especially in light of the damage done to local fishing gear during us wind's surveys in November, 2021.the U.S. Commercial fishing industry provides over $170 billion in annual sales and is threatened by the offshore wind development projects. The effects of the proposed us wind project on the fishing industry has not been studied enough and there has been an overall lack of information regarding the environmental impacts of offshore wind farms on the marine wildlife population. I implore BOEM officials to communicate and work directly with the commercial fishing industry as you conduct your environmental review. Many of our local watermen believe they have been excluded in the decision-making project for offshore wind energy development, and trust needs to be built, especially after earlier damage done to local fishing gear during the us wind survey. |
| BOEM-2022-0025-DRAFT-0072-359 | Mary Beth Carozza | State agency | Maryland State Senator District 38 | Commercial Fisheries and For-Hire Recreational Fishing | Same comment as above, detailed in BOEM-2022-0025-DRAFT-0071-A1 |
| BOEM-2022-0025-DRAFT-0086-398 | Suzanne Battista | Individual | None | Commercial Fisheries and For-Hire Recreational Fishing | My concerns are:<br>· Responsible research shows the proposed turbine construction will diminish commercial fishing for 30+ years, interfere with navigational radar and will cause “pre-agreed upon electric rates” to soar. |
| BOEM-2022-0025-DRAFT-0111-475 | Stuart Bowers | Individual | None | Commercial Fisheries and For-Hire Recreational Fishing | Wind turbines should: Must not upset fishing which is a large business and regular activity of vacationers. |
| BOEM-2022-0025-DRAFT-0165-640 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Commercial Fisheries and For-Hire Recreational Fishing | We defer to the National Marine Fisheries Service (NMFS) on the most appropriate data for considering overlap of the project area with commercial and recreational fisheries, EFH, and fishing vessel transit. The COP may require some updates based on this information (e.g., table 8-3 in Volume II of the COP is an incomplete list). BOEM should also rely on NMFS for guidance on how to analyze the potential impacts of the project on marine species (including species targeted by commercial and recreational fisheries and protected species), marine habitats, and socioeconomic impacts for commercial and recreational fisheries, fishery support businesses, and fishing communities. NMFS should also be consulted to ensure a thorough understanding of the limitations of each data set. Important data limitations should be supplemented with stakeholder input. |
| BOEM-2022-0025-DRAFT-0165-642 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Commercial Fisheries and For-Hire Recreational Fishing | The EIS should describe how impacts may vary by target species, gear type, fishing location (e.g., from shore, mid-water, on different bottom types, near structures such as shipwrecks, other artificial reefs, or boulders) and commercial or recreational fishing (including recreational fishing from shore, private vessels, party/charter vessels, and tournaments).<br>The EIS should explain that the proposed 0.77 x 1.02 nm grid layout of the projects will not eliminate all concerns about safely fishing, maneuvering, drifting, or anchoring near turbines and offshore substations. Safety considerations will vary based on weather, gear type, vessel size, and specific fishing practices which can vary by target species. |
| BOEM-2022-0025-DRAFT-0165-643 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Commercial Fisheries and For-Hire Recreational Fishing | Fishermen choose where to fish based on many factors including the location of target species and species they wish to avoid, where regulations allow, where they can fish most efficiently, and where they plan to land their catch based on market and regulatory factors. For these reasons, fishermen cannot easily relocate to different areas to avoid a wind project without socioeconomic impacts. Fishermen who choose to fish outside this project area for safety, economic, or other reasons may not be able to recoup the loss of landings and revenue by shifting effort elsewhere.<br>As we have stated in past comment letters to BOEM, fisheries importance should not be measured solely based on dollar value or volume of landings. Other factors including, but not limited to, the number of participants, impacted communities, seasonal importance, and use (e.g., a lower value species harvested for bait in a higher value fishery) must also be considered. |
| BOEM-2022-0025-DRAFT-0165-650 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Commercial Fisheries and For-Hire Recreational Fishing | Modeling work has suggested that the physical presence of turbines can alter near-surface and near-bottom temperatures, and thus, habitat conditions for marine species, as well as juvenile transport of commercially important species like sea scallop.4 Potential impacts to the Mid-Atlantic Cold Pool and resulting impacts on fishery species are also of concern to the Councils and other fishery stakeholders |

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| BOEM-2022-0025-DRAFT-0184-700 | Jennifer Holmes | State agency | Delaware Department of Natural Resources and Environmental Control | Commercial Fisheries and For-Hire Recreational Fishing | The Proposed Action appears to overlap with important benthic, invertebrate and finfish resources and habitat, as well as commercial and recreational fishing off the coast of Delaware. Delaware promotes the safe operation of commercial and recreational fisheries and provides input and guidance on the conduct of other marine uses in a manner that encourages compatibility with sustainable fishing and fishing communities. BOEM should acknowledge these overlaps and clarify what aspects of the cumulative impacts will be evaluated. Moreover, individual project and cumulative impacts should be considered as it relates to all life stages of fish, habitats and fisheries; and if avoidance is not possible, impacts should be minimized and mitigated to the fullest extent possible.<br>DNREC looks forward to the release of BOEM's Fisheries Mitigation Guidance and encourages incorporation of the mitigation best practices into US Wind's construction and operations plan (COP).<br>In general, potential impacts to commercial and recreational fisheries should be evaluated for each phase of development – construction, operations, and decommissioning – across fishery species from the following aspects:<br>• Acoustic impacts<br>• Electromagnetic field impacts<br>• Micrometeorological effects<br>• Hydrodynamic changes<br>• Benthic changes<br>• Artificial reef effects<br>• Sensitive areas within or near the footprint<br>• Species potentially affected<br>• Monitoring and research needed<br>• Fishery vessel exclusion, displacement, or increased collision risk<br>• Physical habitat conversions and losses, such as scour and sedimentation |
| BOEM-2022-0025-DRAFT-0184-701 | Jennifer Holmes | State agency | Delaware Department of Natural Resources and Environmental Control | Commercial Fisheries and For-Hire Recreational Fishing | o DNREC recommends that areas identified as Shellfish Aquaculture Development Areas (SADA) in the Delaware Inland Bays be avoided for offshore wind cable activities, as wind energy development could interfere with shellfish aquaculture activities and cables could impact current or future shellfish aquaculture gear or markings (poles, anchors, netting, etc.). A map of the SADA can be found at the following link: https://dnrec.maps.arcgis.com/apps/PublicInformation/index.html?appid=50d387d56725401e920001e46fa73f27<br>o DNREC recommends that areas of high natural hard clam (Mercenaria mercenaria) density of two or more hard clams/square yard be avoided in offshore wind development/cable corridors in the Inland Bays. Hard clams are an important natural resource for the state and the majority of recreational and commercial clamming takes place in the Inland Bays. Delaware has enjoyed a stable hard clam population in the Inland Bays for decades, and in order to best protect the resource it is important to avoid work, sediment disturbance, and burial in the areas with higher density populations. Areas of hard clam density are indicated on Figure 1. |
| BOEM-2022-0025-EMAIL-275-842 | Michael Pentony | Federal agency | NMFS | Commercial Fisheries and For-Hire Recreational Fishing | Important commercial and recreational fisheries operating within the project area include the American lobster, Atlantic menhaden, Atlantic sea scallop, Atlantic surfclam, black sea bass, conch/whelk, marlin, spiny dogfish, and tuna fisheries. |
| BOEM-2022-0025-EMAIL-275-852 | Michael Pentony | Federal agency | NMFS | Commercial Fisheries and For-Hire Recreational Fishing | The COP contains a good overall discussion of commercial and recreational (party/charter and private angler) fisheries affected based in part on existing socioeconomic impact reports available on our website (available at: https://www.fisheries.noaa.gov/resource/data/socioeconomic-impacts-atlantic-offshore-wind-development?utm_medium=email&utm_source=govdelivery). However, those reports split the project area into two segments (US Wind 1 (0490) and US Wind 2 (0490 Remainder)). Although it is possible to add together landings and revenues, doing so for fishing effort will likely provide an inaccurate estimate of the number of vessels and trips that operate in the project area. As a result, we recommend that the EIS use information derived from a new data request for this project area that combines the two areas previously evaluated, which would allow the integration of more accurate and updated data on fisheries and communities that are affected by this project. We encourage you to coordinate with our Greater Atlantic Regional Office (GARFO) for updated data requests. |
| BOEM-2022-0025-EMAIL-275-853 | Michael Pentony | Federal agency | NMFS | Commercial Fisheries and For-Hire Recreational Fishing | We encourage you to coordinate with our HMS Office and the Southeast Regional Office and Southeast Fisheries Science Center for more information about affected HMS fisheries. While the COP primarily discusses affected fishery revenue, it is also important to discuss affected fishery landings. For example, some affected fisheries (menhaden and spiny dogfish) are low-value, high-volume fisheries. Due to their low value, the importance of these fisheries as a source of sustainable food and bait and the secondary economic benefits to specific affected communities and portside support services that rely upon these fisheries are underrepresented in the COP. This should be rectified in the EIS.<br>The menhaden, horseshoe crab, and conch/whelk fisheries are not well represented in federal data collections due to existing reporting requirements for those fisheries. We recommend the EIS consider alternative sources including state data and federal processing reports to fully evaluate such fisheries. Further, the EIS should more comprehensively assess historic and recent fishery operations using available vessel monitoring system (VMS) data instead of only considering automatic identification system (AIS) data. As we have noted for previous projects, AIS data are incomplete and only cover a portion of fishery operations. |
| BOEM-2022-0025-EMAIL-275-854 | Michael Pentony | Federal agency | NMFS | Commercial Fisheries and For-Hire Recreational Fishing | The EIS should also consider potential impacts beyond the vessel owner level to include shoreside support services (e.g., dealers, processors, distributors, suppliers), including impacts to vertically integrated businesses as well as coastal communities dependent on fishing. Information that can help characterize communities engaged in fishing activity can be found on our website describing social indicators for coastal communities (available at: https://www.fisheries.noaa.gov/national/socioeconomics/social-indicators-coastal-communities) and should be integrated into the EIS. Finally, the biological status of many species affected within the project area can be found on our individual species pages (available at: https://www.fisheries.noaa.gov/find-species), and recent trends can be found on our Stock SMART page (available at: https://www.st.nmfs.noaa.gov/stocksmart?app=homepage). |
| BOEM-2022-0025-EMAIL-275-868 | Michael Pentony | Federal agency | NMFS | Commercial Fisheries and For-Hire Recreational Fishing | The EIS should discuss biological impacts to marine species caused by the temporary or permanent loss/conversion of bottom habitat (i.e., resource distribution, productivity, or abundance changes) and direct or indirect socioeconomic impacts to commercial and recreational fishing activities and support businesses from project construction and operation. Such impacts include loss of access to important fishing areas due to the presence of structures (WTGs, substations, cables, scour protection) and associated changes to fishery revenue, reduced fishery quotas due to potential population impacts and increased scientific uncertainty, gear loss, and increased operational costs that may result from increased steaming time around the project area. This evaluation should also include any potential displacement of fishing activities and resulting increased gear conflicts, bycatch, catch rates, and fishing pressure in other locations. When structuring the fishery socioeconomic impact evaluation, the EIS should address all of the elements identified in our socioeconomic impact checklist.6 An important element to consider is the dependence upon fishing within the project area by individual vessels. Although most commercial vessels do not depend upon the project area for more than 10 percent of annual fishery revenue, several party/charter vessels depend upon this area for over 25 percent of annual fishery revenue in certain years, with one vessel reliant upon the area for 100 percent of annual revenue in one year. Such dependence should be discussed in the EIS. As noted above, our fishery socioeconomic impact summaries can and should serve as the foundation for this analysis in the EIS, although additional project-specific analysis may be necessary to address particular impacts or mitigation/compensation arrangements with affected fisheries.<br>Available at: https://media.fisheries.noaa.gov/2022-02/Socioeconomic-InfoNeeds-OSW-GARFO.pdf |

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| BOEM-2022-0025-EMAIL-275-874 | Michael Pentony | Federal agency | NMFS | Commercial Fisheries and For-Hire Recreational Fishing | The EIS should evaluate the cumulative impacts of multiple projects on fishing operations, such as changes to time and area fished, gear type used, fisheries targeted, and landing ports. Some fishing vessels operate in multiple areas that may be subject to wind project development. While some may choose to continue to fish in these areas, others may be displaced from one or more project areas and fish in different areas outside the project areas. Similarly, vessels may avoid transiting through project areas, incurring increased steaming time to/from fishing grounds and ports. These changes are important to consider because it would likely become more difficult for fisheries to transit or find alternative fishing locations, resulting in increased cumulative impacts to fishing operations as more projects are constructed. The EIS should consider the socioeconomic impacts on fishing communities that cannot relocate fishing activity due to cultural norms (fishing grounds claimed or used by others), cost limitations (too expensive to travel greater distances to other fishing areas), and other relevant limiting factors such as fishing permits and associated regulations. Shifts in fishing behavior, including location and timing, may result in cumulative impacts to habitat, as well as target and bycatch species (both fish and protected species) that have not been previously analyzed in fishery management actions. Finally, reduced regional scientific survey access to project areas could increase uncertainty in associated stock assessments and result in more conservative quotas that would negatively impact fishery operations in all fisheries. |
| BOEM-2022-0025-EMAIL-275-887 | Michael Pentony | Federal agency | NMFS | Commercial Fisheries and For-Hire Recreational Fishing | Because lobster vessels are only required to submit vessel trip reports (VTRs) if they are issued a Federal permit for another species (many are not), lobster and Jonah crab operations are not fully captured in available VTR data and are underrepresented in our socioeconomic impact summary report. Information on highly migratory species catch are only partially captured in VTRs available from the Greater Atlantic Regional Fisheries Office (GARFO) and are instead found in VTRs available from our Southeast Regional Office and the large pelagics survey (available at https://www.fisheries.noaa.gov/recreational-fishing-data/recreational-fishing-data-downloads). Preliminary analysis of the large pelagic survey data suggest there are HMS species caught in the southern portions of the project area. Such sources should be consulted when preparing the EIS. Private angler recreational catch data are not collected with sufficient area precision to determine the amount of catch inside a particular wind project area. Despite this limitation, the project area is likely to affect important regional recreational fisheries and a discussion of private angler catch should be included in the EIS. Using similar methods to Kirkpatrick et al. (2017), recreational fishing exposure should be calculated with the most recent data as the COP currently reports findings for 2007-2012. Prime Fishing Areas are identified and designated by NJ as "...areas that have a demonstrable history of supporting a significant local intensity of recreational or commercial fishing activity." (N.J.A.C 7:7-9.2). The U.S. Wind lease area overlaps with area #162 of NJ's Prime Fishing Areas and is located just south of "The Old Grounds." As noted in the COP, fishing tournaments, particularly for highly migratory species such as tunas and marlin, are an important component of the fishery that may be affected by this project and should be discussed in the EIS. |
| BOEM-2022-0025-EMAIL-275-889 | Michael Pentony | Federal agency | NMFS | Commercial Fisheries and For-Hire Recreational Fishing | A quantitative analysis of the potential biological, social, and economic costs of the project to fishing industries and their communities must be included in the EIS…..Vessels may experience increased operational costs from increased insurance rates to fish within wind farms or additional fuel required to transit around wind farms or search for new fishing locations. Opportunity costs such as revenue lost by fishing effort that is displaced into less productive areas, including vessels displaced out of the project area and those already fishing in an area into which displaced vessels move, and the potential for poor recruitment resulting from construction activities should be assessed. Similarly, analysis of the affiliated non-market social impacts of such activities should be included in the EIS, including impacts to cultural norms, fishermen or fishing community social relationships, and health and well-being (see Fisheries Social Impact Assessment Guidance Document https://media.fisheries.noaa.gov/dam-migration/01-111-02.pdf and Practitioner's Handbook https://spo.nmfs.noaa.gov/sites/default/files/TM212_0.pdf). Finally, the EIS should consider and discuss any mitigation measures contemplated to reduce any adverse impacts to fishing operations, particularly those due to loss of area access or gear damage/loss, as outlined in BOEM's draft fishery mitigation guidance. |
| BOEM-2022-0025-EMAIL-275-890 | Michael Pentony | Federal agency | NMFS | Commercial Fisheries and For-Hire Recreational Fishing | the US Wind project is anticipated to have major adverse impacts on NMFS Northeast Fisheries Science Center scientific surveys, which will, in turn, result in adverse impacts on fishery participants and communities, conservation and recovery of protected species, and on the American public. This project would have direct impacts on the federal multi-species bottom trawl survey conducted on the FSV Henry Bigelow, the surfclam and ocean quahog clam dredge surveys conducted on chartered commercial fishing platforms, the integrated benthic/sea scallop habitat survey, ship and aerial-based marine mammal and sea turtle surveys, Large Coastal Shark Bottom Long-line Survey, and the shelf-wide Ecosystem Monitoring Survey (Ecomon). Based on standard operating practices conducted by the NOAA Office of Marine and Aviation Operations, WTG arrays would preclude safe navigation and safe and effective deployment of mobile survey gear on NOAA ships. The impacts to our scientific surveys from this project will be driven by four main mechanisms: 1) exclusion of NMFS sampling platforms from the wind development area, 2) impacts on the random-stratified statistical design that is the basis for data analysis and use in scientific assessments, advice, and analyses; 3) the alteration of benthic, pelagic, and airspace habitats in and around the wind energy development; and 4) potential reductions in sampling outside wind areas caused by potential increased transit time by NOAA vessels. Adverse effects on monitoring and assessment activities would directly impact the critical scientific information used for fisheries management and the recovery and conservation programs for protected species. These impacts would result in increased uncertainty in the surveys' measures of abundance, which could potentially lead to lower quotas for commercial and recreational fishermen and lower associated fishing revenue based on current fishery management council risk policies. These impacts will occur over the lifetime of wind energy operations at the project area and in the region (to at least 2050). |
| BOEM-2022-0025-TRANS-20-70 | John Strangfeld | Individual | None | Commercial Fisheries and For-Hire Recreational Fishing | I'm also an offshore fisherman, and as I see these grids of these various plots and I know they focus on the Marylands, not the ones in Delaware, I wonder, and I've heard about concerns about impact on electronics, impact upon radar, et cetera, et cetera, that could have another effect on either navigation or the ability for many people to pursue the interest they have in the fishing and outdoor life as well. |
| BOEM-2022-0025-TRANS-26-96 | Peggy Schultz | Non-governmental organization | Power People for Offshore Wind Energy Resources | Commercial Fisheries and For-Hire Recreational Fishing | We've heard some trawl fishermen complained that the long nets they dragged behind their boats would get tangled up in the bases of offshore wind turbines. When queried about trawling, Mr. Clark says that this type of fishing is outlawed in Delaware because it so badly depletes fish stocks. About 40% of the trawlers catch includes non target fish. These are returned to the ocean either dead or dying. It's kind of an afterthought. |
| BOEM-2022-0025-TRANS-35-120 | Kathy Phillips | Individual | None | Commercial Fisheries and For-Hire Recreational Fishing | And as has already been stated in this presentation, commercial fishing. There are commercial fishing needs that also require open, unobstructed areas of Ocean. |
| BOEM-2022-0025-TRANS-38-135 | Kerrie Bunting | Local agency | Ocean Pines Chamber of Commerce | Commercial Fisheries and For-Hire Recreational Fishing | And as small business advocates, I have been extremely concerned about what has happened to our commercial fishermen coming out of the West Ocean City commercial fishing harbor. |
| BOEM-2022-0025-TRANS-55-182 | Dr. Ted Spickler | Individual | Climate Reality Project | Commercial Fisheries and For-Hire Recreational Fishing | Somehow, BOEM, you're going to have to do something about communicating with the fishermen, sports and commercial. They're seeing something they don't like to see. It's hurting them. And maybe there's an answer to that, but you're going to have to talk to them directly. You're going to have to give them some back and forth ideas. |
| BOEM-2022-0025-TRANS-58-193 | Mary Beth Carozza | State agency | Maryland State Senator District 38 | Commercial Fisheries and For-Hire Recreational Fishing | I also want to associate my comments with the impact on commercial fishing that Carrie Bunning outlined earlier. Twelve years later, since the first meeting on the Maryland lease area, the plan has grown with turbine heights more than twice what was envisioned in 2010, yet located the same distance from the shore. For the past five years, the town of Ocean City has made a fair and reasonable request that the turbines either be relocated further off of Ocean City's coast or new lease areas be created further offshore. Along with the visibility issues that have been raised by the town of Ocean City for the past several years, I consistently have raised additional concerns about the impact of the larger turbines on commercial fishing, maritime transportation and military communications. The spinning blades can create false radar images, which are a hazard to marine traffic, can hinder coast guard search and rescue efforts, and block military radar installations. Specifically, the commercial industry fishing industry continues to raise their objections to the larger turbines, as the tight spacing of the structures will make the wind farm areas inaccessible to many local commercial fishing vessels that use gear that can be snagged and fouled by the tower foundations. And we've already had problems with the surveys that have been conducted by US Wind on our commercial watermen. |
| BOEM-2022-0025-TRANS-58-196 | Mary Beth Carozza | State agency | Maryland State Senator District 38 | Commercial Fisheries and For-Hire Recreational Fishing | And your own studies that you've conducted impacting tourism economies and also, as was stated earlier, to please work directly with the commercial fishermen to work through the issues that they have been raising from our standpoint, ocean City and in Maryland. |

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| BOEM-2022-0025-DRAFT-0178-678 | William J. Cook | Local agency | Cape May County, NJ via Cultural Heritage Partners | Cultural, Historical, and Archaeological Resources | 1. Cultural and Historic Resources<br>During this phase of the Project, in addition to assessing all impacts to the natural environment, it is critically important that BOEM fully assess and consider impacts upon all cultural and historic resources that may be impacted, whether directly or indirectly. The COP, as drafted, falls short of the NHPA's mandates that require consideration of all adverse effects.<br>Cape May County falls within the Area of Potential Effect for identifying and assessing adverse effects to historic properties for purposes of NEPA and NHPA review and that their integrity will be adversely affected. Therefore, the DEIS should include a full assessment of effects on all properties within the County listed or eligible for listing in the National Register of Historic Places that are likely to experience adverse visual effects so that the County's residents can understand the nature and extent of those effects. At present, it is impossible for the County to comment fully on adverse effects without access to this information. Therefore, we ask that BOEM require revisions to the COP on all aspects of visual impacts to historic properties so that meaningful consultation with BOEM can occur as required by federal law. |
| BOEM-2022-0025-DRAFT-0178-680 | William J. Cook | Local agency | Cape May County, NJ via Cultural Heritage Partners | Cultural, Historical, and Archaeological Resources | It is uncontroverted that US Wind has the potential to impact Cape May County's viewshed and, consequently, its historic maritime setting and that of other communities. Under NEPA, BOEM must consider a wide range of effects, specifically including impacts that are "historic, cultural, [and] economic."7 BOEM must carefully consider the impacts on the County's unique character, which qualifies as a "resource" under NEPA's definition. Spoliation of the County's historic landscape may lower property values or tourism revenue. Negative impacts on the County—as well as other New Jersey communities—may be quite significant and these potential adverse effects must be carefully considered.<br>Due to the high potential for US Wind to adversely impact cultural sites, historic properties, the viewshed, property values, and tourism, BOEM should conduct additional visual assessments and simulations, and provide consulting parties and the public with adequate and easily accessible information that informs all parties of potential impacts. |
| BOEM-2022-0025-EMAIL-276-892 | Jonathan Meade | Federal agency | NPS | Cultural, Historical, and Archaeological Resources | The following list includes National Historic Landmarks (NHLs) and National Historic Landmark Districts (NHL Districts) that are located within coastal counties adjacent to the US Wind Project area and therefore could be affected/impacted by subsequently proposed elements of the project if they fall within the project's Area(s) of Potential Effect (APE). Note that New Jersey is not identified as a state within the project area in the FR notice, however Cape May County appears to be in close enough proximity to the project area for potential adverse effects. These listed sites may be within the county and not immediately onshore but could still be impacted by onshore connection routes and activities. Additional information on each NHL below can be provided in the future.<br>• New Jersey: Cape May County (Cape May NHL District)<br>• Delaware: Kent County (Aspendale NHL, John Dickenson House NHL); Sussex County (Lightship LV-118 NHL) |
| BOEM-2022-0025-EMAIL-276-896 | Jonathan Meade | Federal agency | NPS | Cultural, Historical, and Archaeological Resources | NPS is aware of potential battlefield sites and submerged cultural resource sites, but surveys conducted to date have not been sufficient to identify all such resources or their eligibility for inclusion on the National Register. NPS is aware the developers of off-shore wind facilities will be required to conduct extensive archaeological and marine archaeological surveys. NPS's American Battlefield Protection Program (ABPP) can assist in providing any information we might have to date on efforts to identify submerged resources. SHPOs can provide information that they have on these types of resources as well. We also look forward to reviewing the results of US Wind-funded surveys. |
| BOEM-2022-0025-EMAIL-276-897 | Jonathan Meade | Federal agency | NPS | Cultural, Historical, and Archaeological Resources | As always, NPS encourages BOEM to consult with the Delaware, Maryland, and New Jersey SHPOs, per 36 CFR 800.4(a)(2), to identify any National Register properties or NHLs within the APE that may be affected by the undertaking. For management purposes, the NPS recognizes five categories of cultural resources: archeological resources, historic structures, cultural landscapes, ethnographic resources, and museum collections. These cultural resources represent tangible manifestations of humans interacting with their environment and with each other throughout time, up to the present day.<br>We also suggest that BOEM coordinate with the Delaware, Maryland, and New Jersey SHPOs to identify tribes that may be interested in consulting. |
| BOEM-2022-0025-EMAIL-277-921 | Stepan Nevshehirlian | Federal agency | EPA | Cultural, Historical, and Archaeological Resources | The EIS should clearly explain any potential impacts to onshore and offshore historic and archaeological resources, including avoidance of impacts, how impacts were determined, and mitigation measures. We recommend that the EIS include a thorough summary of information in the Visual Impacts to Historical Resources, Terrestrial Archaeology Resource Assessment, Marine Archaeological Resource Assessment, and other studies along with documentation of comments provided by agencies and consulting parties under Section 106. The EIS should outline how proposed mitigation and monitoring measures have been developed and how they avoid or compensate for adverse effects. |
| BOEM-2022-0025-TRANS-22-76 | Terence McGean | Local agency | Ocean City | Cultural, Historical, and Archaeological Resources | Clearly, an independent evaluation of the potential negative economic and cultural impacts that these new super sized turbines would have on Ocean City needs to occur. I urge BOEM to require this study and to take its results seriously. |
| BOEM-2022-0025-DRAFT-0011-225 | Edward Larkey | Individual | None | Demographics, Employment, and Economics | The Delmarva Penninsula has a lot to gain economically from the location of an offshore wind generating facility that serves the mid-Atlantic region. |
| BOEM-2022-0025-DRAFT-0013-228 | Charles Meneveau | Individual | None | Demographics, Employment, and Economics | The benefits will be profound: there is an offshore wind energy boom coming, jobs, infrastructure. |
| BOEM-2022-0025-DRAFT-0032-271 | Surajit Sengupta | Non-governmental organization | nTech Workforce | Demographics, Employment, and Economics | I am in full support of the US Wind project to build their Off Shore Wind project off coast of Ocean City Maryland and to build a manufacturing facility at Trade Point Atlantic in Baltimore County. The company has been reaching out to the minority and small business communities to explain the project and provided information regarding its support for Birds, Fish and all forms of marine life in the Ocean City area. Thus, our organization is in full support of the Bureau of Energy Management approving US Wind Construction and Operations Plan and letting the project move forward to provide clean renewable energy to the citizens of Maryland. |
| BOEM-2022-0025-DRAFT-0041-284 | Diane Hanson | Individual | None | Demographics, Employment, and Economics | The wind developers will invest hundreds of millions of dollars to strengthen the grid in Sussex County. Thus, Sussex gets the energy, a significantly improved infrastructure, and all the jobs created to do that work. The developers will use Delaware companies in their construction supply chain, and entrepreneurs are launching ventures that will thrive because offshore wind is nearby. These ventures will create more area jobs and economic growth. |
| BOEM-2022-0025-DRAFT-0046-298 | Victoria Venable | Non-governmental organization | Chesapeake Climate Action Network | Demographics, Employment, and Economics | BOEM's evaluation of the environmental impact of this project should also include an analysis of socioeconomic impacts. In the most recent decision to expand offshore wind development in Maryland, the Public Service Commission attached numerous conditions to the project approval, including the requirement to create a minimum of 10,324 jobs (between both awarded developers), commit to goals to engage small, local and minority businesses, and pass 80% of construction cost savings to ratepayers.40 |
| BOEM-2022-0025-DRAFT-0047-302 | Rose Mary Hoy | Individual | None | Demographics, Employment, and Economics | Most new jobs from this project will go to European countries, with just a few in Maryland and Delaware. |
| BOEM-2022-0025-DRAFT-0052-315 | Megan Staczek | Individual | None | Demographics, Employment, and Economics | Most new jobs from this project will go to European countries, with just a few in Maryland and Delaware. |
| BOEM-2022-0025-DRAFT-0053-319 | Angela Silverman | Individual | None | Demographics, Employment, and Economics | None of the benefits of this project go to Delaware. The energy and the jobs all go to Maryland. |
| BOEM-2022-0025-DRAFT-0073-362 | Jodi Rose, Albert Todd | Non-governmental organization | Interfaith Partners for the Chesapeake | Demographics, Employment, and Economics | In addition, IPC recognizes the struggle of many communities with securing living wage jobs. Out of respect for human dignity and the dignity of work, we strongly encourage this project that proposes to provide more than 10,000 clean energy jobs. IPC works with many of the communities active in the Baltimore area who will benefit from jobs at the new Sparrow's Point production and staging facility, and we witness firsthand the tremendous need for living wage jobs. |
| BOEM-2022-0025-DRAFT-0086-399 | Suzanne Battista | Individual | None | Demographics, Employment, and Economics | My concerns are:<br>· Most new jobs from this project will go to European countries, with just a few in Maryland and Delaware. |

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| BOEM-2022-0025-DRAFT-0128-530 | Brian Feldman | State agency | Maryland State Senator, District 15 | Demographics, Employment, and Economics | I am pleased to submit this letter of support as the Bureau of Ocean Energy Management explores the construction and operating plan for the US Wind Offshore Wind Project (Project).For nearly a decade, the Maryland General Assembly has aggressively pursued the procurement of offshore wind energy, not only to meet the State's greenhouse gas reduction goals, but also as a means of attracting a new, job-creating industry to the State that will revitalize its economy with work done by minority-owned businesses and union labor. Additionally, President Biden's ambitious yet achievable goal of deploying 30 GW of offshore wind energy by 2030 creates an unique demand for domestic manufacturing of offshore wind component parts and a healthy pipeline for family-sustaining jobs. Sparrows Point Steel, Maryland's first permanent offshore wind component factory, has the potential to be one of the largest offshore wind staging ports in the United States, creating more than 500 good-paying manufacturing, construction, and logistics jobs – most of which will be union jobs – as part of a new, sustainable, domestic supply chain. The facility will have significant marshalling and storage land, as well as considerable quayside access and an adjacent dry dock, making it one of the most competitive offshore wind marshalling hubs on the East Coast. The Project is critical for both the long-term growth of Maryland's offshore wind industry and successfully achieving the Nation's goals for domestic manufacturing related to clean energy development. As referenced above, I was the lead sponsor of The Maryland Clean Energy Jobs Act of 2019 which mandates that Maryland utilities get 50% of their power from renewable energy sources by 2030. It specifically targets solar and offshore wind sources while helping to catalyze Maryland's clean energy industry and create thousands of clean, green jobs. I continue to champion these initiatives and am very interested to see this Project come to fruition. |
| BOEM-2022-0025-DRAFT-0191-724 | Jason Walsh | Non-governmental organization | Bluegreen Alliance | Demographics, Employment, and Economics | Socio-Economic Impacts: To achieve the Biden Administration's vision for maximizing union job creation and comply with NEPA's requirement that federal projects "fulfill the social, economic, and other requirements of present and future generations of Americans," the EIS should include a robust analysis of socioeconomic impacts associated with US Wind's COP. |
| BOEM-2022-0025-EMAIL-274-834 | Sam Salustro | Non-governmental organization | Business Network for Offshore Wind | Demographics, Employment, and Economics | Project developers Ørsted and US Wind committed in Maryland's latest procurement round to develop three primary component manufacturing facilities building the towers, monopiles, and array cables in Baltimore Harbor. Rivaling the manufacturing cluster emerging in Albany, this could be the greatest concentration of offshore wind manufacturing on the East Coast and will draw significant number of downstream suppliers. In fact, Maryland project developers have committed to creating at least 12,000 FTE jobs during the project lifetime and spending over $1.5 billion in capital expenditures during construction. Individually, in US Wind's OREC agreements, the developer projected it would create 8,288 FTE jobs during the construction and installation period, and nearly a 100 jobs per year during operations and maintenance. The project developer also committed to target contracts to minority and women-owned business firms and is already filing reports with the state detailing its outreach and progress. Finally, as referenced earlier, US Wind is building Sparrows Point Steel, a monopile facility located on the grounds of a former steel plant, and which will employ at least 500 at its peak. These monopiles will supply not just Maryland projects, but potentially the entire U.S. market. |
| BOEM-2022-0025-EMAIL-277-922 | Stepan Nevshehirlian | Federal agency | EPA | Demographics, Employment, and Economics | Socioeconomic resources are generally evaluated at the county level in Section 17 of Volume II. It is unclear that this scale is appropriate to capture the range of potential beneficial and adverse impacts, which may be more localized. We recommend a detailed analysis that fully considers impacts to residents and businesses, including potential impacts to communities that use the Atlantic Ocean and Indian River Bay as a source of food and income. Potential effects on subsistence uses, commercial fishermen, recreational tour operators, and other small businesses should be carefully evaluated.<br>•Impacts on commercial and recreational fishing should be fully evaluated. Potential impacts on fisheries, including species identified as commercially important to the local economy, such as summer flounder, should be throughly evaluated. Section 17.5 indicates that over 200,000 recreational fishing trips are made annually in the Delaware Inland Bays; impacts to recreational fishing in Indian River Bay and the businesses it supports should be analyzed.<br>•We also suggest that the EIS address the project on electricity reliability, correction of any infrastructure issues or deficiencies, and potential impacts on rate payers.<br>•EPA suggests the continuation of outreach and community dialogue after the Project is constructed to monitor the potential for adverse impacts. |
| BOEM-2022-0025-EMAIL-277-926 | Stepan Nevshehirlian | Federal agency | EPA | Demographics, Employment, and Economics | We recommend that the EIS assess whether any environmental health and safety risks to children may occur from the Project, including noise and emissions, in accordance with Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks. |
| BOEM-2022-0025-TRANS-14-50 | Lauren Brown | Individual | None | Demographics, Employment, and Economics | I was also encouraged by the labor agreements with unions and minority businesses, as well as working with the Native American tribes. I believe that offshore wind projects will provide quality jobs and supply chain commitments. |
| BOEM-2022-0025-TRANS-16-56 | Seth ?? | Individual | None | Demographics, Employment, and Economics | The second thing I just like to point out is as BOEM and different when companies are speaking with the coastal town Delaware, please don't forget about North Bethany. North Bethany is the 1283 homes, 25 neighborhoods that are unincorporated between the Indian River Inlet and the town of Bethany. You can reach all these HOAs via VA Casa, who is the property manager that we all use to sort of communicate to our different HOAs. But I'd be happy to liaison as well. I think North Bethany sort of is an area that might have some interesting input for you all.<br>And I just don't want us to get left out of the conversation as we typically do. We are not part of the town of Bethany. We are totally separate. We're unincorporated. |
| BOEM-2022-0025-TRANS-21-72 | Sam Salustro | Individual | None | Demographics, Employment, and Economics | In order to secure that off, take us when committed to substantial economic development commitments that will create over 8000 jobs for Marylanders all across the state. In Baltimore, on the Eastern Shore, near Ocean City, in western Maryland, all over Maryland, and will significantly strengthen the nation's emerging supply chain for offshore with. US. Wind has committed to building Sparrows Point Steel, a new monopoly foundation facility in the heart of Baltimore, and it's peak. This new facility can supply over 100 monopiles a year for projects up and down the East Coast and employing 500 people in good paying jobs in Baltimore. I want to further mention how the US Wind project in Sparrows Point Steel is creating a major manufacturing cluster in Baltimore and around Maryland. Another project that will be constructed off the Del Marvin Peninsula by ORSA has committed to bringing new facilities to the area, also to build towers and cables, all integral parts to in Australian farm. Combined, these two projects will spend $1.5 billion in the state, invest hundreds of millions of dollars in these new facilities, employ thousand, you know, employ thousands and good manufacturing jobs. All of these jobs helping transition the United States to a cleaner energy future. |
| BOEM-2022-0025-TRANS-23-79 | Natasha Finnegan | Individual | None | Demographics, Employment, and Economics | I look forward also to the jobs that these renewables will provide and believe that the relevant department agencies and companies have taken significant care to minimize the impacts of wind turbine, wind energy, and the cables and the construction on animal life and shipping in the tourism industry economy. |
| BOEM-2022-0025-TRANS-23-82 | Natasha Finnegan | Individual | None | Demographics, Employment, and Economics | We need these jobs. |
| BOEM-2022-0025-TRANS-24-84 | Henry Farkas | Individual | None | Demographics, Employment, and Economics | In fact, it would make me happy to know that we're not destroying the environment for my grandchildren. |
| BOEM-2022-0025-TRANS-36-126 | Dave Arndt | Individual | None | Demographics, Employment, and Economics | Wind turbines provide good, long lasting jobs for the United States. They can't be outsourced. With the announcement of wind turbine factory manufacturing in Baltimore, this is a win win for Maryland and for the US. |
| BOEM-2022-0025-TRANS-41-173 | Eric Mason | Individual | None | Demographics, Employment, and Economics | The current status of our jobs now are predominantly seasonal and minimum wage paying jobs. |
| BOEM-2022-0025-TRANS-43-144 | Christopher Smitley | Non-governmental organization | IBEW Local union 126 | Demographics, Employment, and Economics | I represent 2700 plus electrical construction workers with hundreds who live in the Del Marva Peninsula. So we are highly looking forward to this kind of work. Most of our members have been working out of state for the past 10-15 years. This would give them the opportunity to actually sleep in their own beds with their own families for quite a long duration along this project. Much like somebody else said, this is her people, these are my people. Much like somebody else said, this is her people, these are my people. |
| BOEM-2022-0025-TRANS-43-177 | Janice Proctor | Individual | None | Demographics, Employment, and Economics | I also appreciate the increase in clean energy jobs and opportunities being brought to the area. |
| BOEM-2022-0025-TRANS-43-178 | Janice Proctor | Individual | None | Demographics, Employment, and Economics | I would like or hope to see more information or if you guys are collecting data on how this bottom line, like financial impact, if you're powering houses and things like that, like, how is this going to affect electric power and our billing, especially with the cost of living and increased inflation. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-TRANS-45-149 | Jerry Mclaurin | Local agency | PFC Black Chamber of Commerce | Demographics, Employment, and Economics | I'm the president and founder of the PFC Black Chamber of Commerce here in Prince, Georgia County, Maryland. I represent over 700 black businesses here in Prince George's County. Blacks make up about a third of the population here in Maryland. And I had the pleasure of being in a workshop about a month ago with US Wind and they were telling us about all the great opportunities that this wind farm can produce. |
| BOEM-2022-0025-TRANS-45-150 | Jerry Mclaurin | Local agency | PFC Black Chamber of Commerce | Demographics, Employment, and Economics | Now since the Pandemic, blacks had lost over 40% of their businesses. So when US Wind came to us and talked to us about offshore wind, we were very excited to hear that there's going to be a huge opportunity for black dentists to get involved in the win opportunity. |
| BOEM-2022-0025-TRANS-47-156 | Brian Gilliland | Individual | None | Demographics, Employment, and Economics | You can provide those good jobs for everyone moving forward. You can negotiate good, long lasting technological advances for the state and the community surrounding them. You can encourage people to stay and live their lives in the places they were born and grew up. |
| BOEM-2022-0025-TRANS-48-159 | Surajit Sengupta | Non-governmental organization | Intact Workforce | Demographics, Employment, and Economics | And also the biggest thing for me is the manufacturing facility, which will be built on the Trade Point Atlantic in the Baltimore County, which is close to where my offices and I've been going to a lot of conferences, a few events, and I've always noticed that US wind, the stress on how to work with the minority businesses, which is what we are, and also with the small business communities, they explain the project very well. |
| BOEM-2022-0025-TRANS-49-160 | David Lawson | Non-governmental organization | University of Delaware | Demographics, Employment, and Economics | We were able to secure from President Biden's package recently about $1 million to create an offshore wind training academy that we are looking to create here on the Eastern Shore, probably at the University of Delaware and Lewis, together with Delaware Technical Community College, which will allow many, many participants to access offshore wind training, the skills they need to be able to work on that. So there's a huge component that I think is missing in the debater and workforce development and great opportunities, as Chris was alluding to with these union references. |
| BOEM-2022-0025-TRANS-49-161 | David Lawson | Non-governmental organization | University of Delaware | Demographics, Employment, and Economics | Environmental, you can hear from my accent, I'm from Scotland, and so I have actual real experience in Aberdeen in the north of Scotland. When the oil industry started to disappear, we went to onshore and offshore wind farms, and it has been a boon for the economy. So a little bit of workforce development down here in Sussex County. |
| BOEM-2022-0025-TRANS-5-16 | Jim Strong | Non-governmental organization | United Steel Workders International Union | Demographics, Employment, and Economics | Since that time, we've only had memories of what used to be until an announcement in August of 21 when US Wind and the United Steel Workers entered into a landmark agreement to support the operations of Sparris Point Steel Mill. Spares Point has a special historical relevance to the steel workers and the greater Baltimore community when the plant was in operations with us. When we see that, steel will be coming back to Spares Point and this strong partnership will be creating a reinvestment in family sustaining manufacturing jobs that will supply the offshore wind industry in Maryland and all along the Eastern seaboard. |
| BOEM-2022-0025-TRANS-5-17 | Jim Strong | Non-governmental organization | United Steel Workders International Union | Demographics, Employment, and Economics | Sparows Point Steel will add a new dimension to the economic benefits of Maryland's offshore wind program by creating long term manufacturing jobs at full capacity. Here the economics numbers that we know. Over a 20 year period, there will be capacity 530 steel workers working at Sparrow Point Steel Mill.<br>The labor income over that 20 year period will be $1 billion, and the total economic output over that same period will be nearly 3 billion. Sparrows Point has the potential to be the largest offshore wind staging ports in the United States and an agent of job creation and economic development for the region.<br>This project also is aligned with the Biden administration of clean energy, the development of offshore wind, and creating good paying family sustaining union jobs. |
| BOEM-2022-0025-TRANS-57-189 | Sandra Pruitt | Non-governmental organization | People for Change Coalition | Demographics, Employment, and Economics | And a number of the speakers earlier have stated the benefits of this project to really engage the smaller minority business population, to bring contracts, and the fact that there's going to be a maintenance facility that's going to create jobs as well. |
| BOEM-2022-0025-TRANS-58-191 | Mary Beth Carozza | State agency | Maryland State Senator District 38 | Demographics, Employment, and Economics | It's a district that is a major economic driver for the entire state of Maryland. |
| BOEM-2022-0025-DRAFT-0023-253 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Electromagnetic Fields (EMF) | Effects of Electro Magnetic Fields on marine species are unknown. On pages14-15 of Volume 1 the COP states, “A site specific study of potential impacts, if any, on species such as the horseshoe crab and finfish is needed”. US Wind states a study is planned but there are no specifics on timing or how the study will be done. The project is being built on top of the Carl N. Shuster Jr. Horseshoe Crab Sanctuary. The blood from these creatures is the only material suitable for finding antigens in vaccines. The EIS cannot start without this EMF sensitivity study being completed. |
| BOEM-2022-0025-DRAFT-0066-341 | Calhoun Bond | Non-governmental organization | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0067-346 | Janet Webb | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0076-367 | Mark Newcomer | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0080-375 | fred levy | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0082-381 | Danny Smith | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0083-386 | Robert Kowalski | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0084-391 | Andrew Levy | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0088-403 | Brett Gauntlett | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0093-415 | Kirk Simme | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0095-421 | David Dempsey | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0097-428 | James Roberts | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0099-434 | Mary Simme | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0101-440 | MICHAEL PINKERT | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0103-447 | Beverly Newborn | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0105-453 | Matthew Morris | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0108-465 | Betsy Brino | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0113-480 | Doug Brinkley | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0114-485 | Julia Deves | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0115-490 | Aaron Deves | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0116-495 | Kamran Givpoor | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0119-504 | Anonymous Anonymous 13 | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0120-509 | James Bond | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0125-520 | Behnaz Yalda | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0126-525 | Penn Wyrough | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0132-538 | John Harman | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0133-544 | Donna Fisher | Individual | None | Electromagnetic Fields (EMF) | The potential impacts on marine life from electromagnetic fields produced by submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0138-555 | Paul Taltavull | Individual | None | Electromagnetic Fields (EMF) | The potential impacts on marine life from electromagnetic fields produced by submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0140-562 | Anonymous Anonymous 15 | Individual | None | Electromagnetic Fields (EMF) | The potential impacts on marine life from electromagnetic fields produced by submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0142-569 | Julie Grohovsky | Individual | None | Electromagnetic Fields (EMF) | The potential impacts on marine life from electromagnetic fields produced by submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0145-579 | Sandy A | Individual | None | Electromagnetic Fields (EMF) | The potential impacts on marine life from electromagnetic fields produced by submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0147-587 | E. B. Cohen | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0149-593 | Charles Licameli | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0155-605 | Andrew Finley | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0156-610 | Joanne Finley | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0157-615 | Anonymous Anonymous 16 | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0158-620 | Piper Bond | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0165-647 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Electromagnetic Fields (EMF) | Impacts of EMF on fishery species are a concern to the fishing community. For example, studies have suggested that EMF can result in changes in behavior, movement, and migration for some demersal and pelagic fish and shellfish species.3 The extent to which EMF may or may not impact marine species must be thoroughly described in the EIS. |
| BOEM-2022-0025-DRAFT-0176-673 | Michael Heck | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0195-733 | George Krusen | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0204-769 | Stephani Ballard Wagner | Individual | None | Electromagnetic Fields (EMF) | • The impact of electro-magnetic fields emanating from the buried and incoming very high voltage cable lines is unknown and unexplored in the COP—both as to humans and marine life. As a prerequisite for consideration of the Project, including US Wind's proposed landfall in a heavily<br>utilized area of Delaware State Park, including a beach and bay where children play, and where fishing is conducted, US Wind should undertake studies and provide data on this potential risk. |
| BOEM-2022-0025-DRAFT-0206-797 | Brooks Gearhart | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0208-803 | Catherine Gearhart | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0209-808 | David Gearhart | Individual | None | Electromagnetic Fields (EMF) | 4. The potential impacts on marine life from releases of electrical interference from submarine cables in the Atlantic Ocean and Indian River Bay and River need to be fully assessed. For example, the potential impacts of the project on diamondback terrapins, horseshoe crabs and migratory shorebirds, such as the threatened red knot, that forage on horseshoe crabs should be evaluated in the EIS and alternatives that do not include such negative impacts should be developed and assessed in the EIS. |
| BOEM-2022-0025-DRAFT-0210-815 | Niall O'Malley | Individual | None | Electromagnetic Fields (EMF) | Have Orstead and U.S. Wind considered swapping lease rights? You are currently bidding on lease rights further offshore. The additional distance would reduce the impact on endangered and vulnerable species. Horseshoe crabs, dolphins, sea turtles and whales use electromagnetic navigation. There is a significant lack of research on the impact of the electromagnetic fields that marine animals use as life sustaining sensory input. It is also not understood how the electromagnetic fields generated by the web of undersee cables will impact marine animals. Horseshoe crabs play a critical role in toxicity testing for vaccines, flu shots, injectable drugs and medical devices, which are all tested using horseshoe crab blood that primarily comes from the Delaware Bay. |
| BOEM-2022-0025-TRANS-61-204 | Dolores Greenwich | Individual | None | Electromagnetic Fields (EMF) | So there's the electric magnetic fields, those can  affect people as well as the wildlife and  those lines that are bringing the power in. |
| BOEM-2022-0025-DRAFT-0023-257 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Environmental Justice | Potential loses in tourism will exacerbate social injustice as losses will disproportionately impact lower-wage service workers in restaurants, hotels, and fishing tourism. |
| BOEM-2022-0025-DRAFT-0189-720 | Susan Stevens Miller | Non-governmental organization | Earthjustice | Environmental Justice | The Facilities Proposed By Each Applicant Raise Environmental Justice Issues Which Must Be Addressed By Requiring the Use of Shore Power and Electric Cargo Handling Equipment |
| BOEM-2022-0025-EMAIL-274-836 | Sam Salustro | Non-governmental organization | Business Network for Offshore Wind | Environmental Justice | As BOEM moves forward in assessing the impacts under the EIS, BOEM should ensure that it includes the full scope of benefits to environmental justice communities in the socio-economic analysis, including job creation and funding in communities that have experienced disproportionate levels of environmental degradation. If clean energy projects such as US Wind are not built, the result will be a higher capacity factor for existing fossil fuel plants, or perhaps construction of new facilities.<br>In 2019, fossil fuel generation contributed to just under 50% of Maryland's electricity generation, according to the state. Individuals who live near fossil fuel power plants have historically had incomes lower than the national average and have faced lower home values. Living in the vicinity of fossil fuel power generating facilities has a direct correlation to negative health outcomes for the communities. A policy brief in the journal of Nature Energy demonstrated a coal plant's closure reduces the use of emergency inhalers and other signs of poor lung-health in nearby communities.<br>According to the National Association for the Advancement of Colored People (NAACP) report, "68 percent of African Americans live near a coal-fired power plant". Latinos are also disproportionately exposed to toxic chemicals emanating from fossil fuel plants. A 2016 report from the Clean Air Task Force states that "the air in many Latino communities violates air quality standards intended to protect human health" and Latino children are more likely to die from an asthma attack than white children. Numerous studies support the findings of racial and socio-economic disparities in impacts from fossil burning power plants. The final EIS for US Wind must incorporate these reports and data as part of its analysis in assessing the impacts of the Proposed Action and the No Action Alternatives. |
| BOEM-2022-0025-EMAIL-275-888 | Michael Pentony | Federal agency | NMFS | Environmental Justice | Impacts to port and coastal communities with environmental justice concerns from onshore wind infrastructure development, cable installation and the lease area should be analyzed. The Community Social Vulnerability Indicators (CSVIs) can be used in the analysis for environmental justice concerns.<br>Fishing communities such as New Bedford, Newport News, and Atlantic City are among the highest total revenue from within the lease area and have environmental justice concerns. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-EMAIL-277-923 | Stepan Nevshehirlian | Federal agency | EPA | Environmental Justice | EPA notes that certain populations, including low-income and/or people of color populations, may face elevated susceptibility to impacts that may affect other populations less severely. Therefore, EPA encourages BOEM to fully identify communities that may be of Environmental Justice (EJ) concern and address the potential for impacts to the extent possible.<br>•EPA appreciates the use of EJScreen in the COP. However, we recommend that screening for communities of potential EJ concern be conducted at a scale that is more likely to identify them. The EJScreen analysis included in the COP centered on Ocean City, Maryland and included a buffer of 8 miles. The summary table provided indicates that the study area has a relatively low potential for environmental justice issues. However, the large population (exceeding 34,000 people) over the large area makes it difficult to identify potential EJ concerns. Likewise, the county level summary for Worcester, Sussex, and Baltimore counties is not sufficient to identify communities that may be most impacted by proximity to localized effects. In a screening-level analysis to identify potential communities of EJ concern, EPA recommends evaluating populations in potentially impacted onshore areas at the census block group level and refining the analysis based on additional information, including public input. We note that populations in the vicinity of Indian River Bay and Millsboro may have demographic and socioeconomic vulnerabilities that may not be apparent at a county-level analysis. Potential impacts on tribal communities should also be fully assessed.<br>•EPA recommends further refining the scope of analysis to more accurately characterize the full range of impacts as the project is developed. We recommend refining the assessment to reflect census block group areas where community impacts may be likely based on proximity to facilities, main traffic routes, wind direction, etc.<br>•As communities with EJ concerns are often disproportionately burdened by environmental hazards and other stressors that drive health disparities, EPA recommends the incorporation of data regarding existing pollution and health disparities to determine potential susceptibility to direct and cumulative impacts. For example, EJ populations near onshore facilities under construction or used for construction staging could experience disproportionate noise impacts. Noise has been linked to health effects that might disproportionately impact EJ populations, including stress-related illnesses, high blood pressure, speech interference, and sleep disruption. |
| BOEM-2022-0025-EMAIL-277-924 | Stepan Nevshehirlian | Federal agency | EPA | Environmental Justice | EPA also recommends that the EIS fully evaluate the potential for impacts such as traffic, noise, and localized air emissions to communities of EJ concern in the vicinity of port facilities that will be used to support construction, O&M, or decommissioning activities. An initial analysis could focus on identifying whether communities of potential EJ concern may exist in proximity to port facilities. This identification should start at the census block group level and be refined if possible. We note that such communities often are impacted by existing exposure burdens.<br>•For example, EJScreen data indicates communities of potential EJ concern in the vicinity of Sparrows Point near Baltimore, Maryland. EJScreen shows socioeconomic vulnerabilities relative to the rest of the US. The block groups to the northwest of Sparrows Point (e.g., block groups 240054213001, 240054213002, and 240054213003) have populations that range from 57-85% people of color, 41-62% low-income households, and the unemployment rate exceeds the 90th percentile nationally. EJ Indices and health disparity data suggest that these block groups have existing high environmental burdens; for example, low life expectancy and asthma and are among the highest in the nation. These communities should be identified so that the potential for adverse and disproportionate effects can be fully evaluated. Once potential vulnerable populations are identified, potential impacts should be assessed and mitigated, if necessary. The EIS should address any likely facility expansion or upgrades, changes to surrounding traffic or needed transportation improvements, noise, local air quality impacts, and other impacts to surrounding communities during construction, operation, and maintenance of the Project, including onshore construction of facilities. We suggest that the EIS evaluate the project's impacts in light of existing conditions and disproportionate vulnerabilities that affect communities with EJ concerns.<br>•The analysis should evaluate whether communities with EJ concerns receive equitable benefits as well as adverse impacts from the Project.<br>•We encourage working with port facilities on plans to identify and address impacts. Such measures could include identifying emission reduction best practices for ports such as vessel speed and idle reduction requirements, Tier 4 EPA certified equipment or retrofitting of older equipment. More information regarding air emissions reduction methods at ports can be accessed at https://www.epa.gov/ports-initiative. |
| BOEM-2022-0025-EMAIL-277-925 | Stepan Nevshehirlian | Federal agency | EPA | Environmental Justice | EPA recommends continued community outreach for meaningful public engagement and participation to identify potential impacts and inform mitigation measures associated with construction, operation, maintenance, and decommissioning of the Project. EPA encourages tailoring outreach to affected communities, including providing notices of public meetings, announcements of informational events, and other resources at frequently visited community locations.<br>The EIS should include a discussion of outreach efforts and mitigation measures, including how the Project has been modified in response to community concerns and input in the EJ section of the EIS. Where possible, we suggest making specific commitments to communities to reduce potential impacts from the proposed Project and documenting that in the EIS.<br>We recommend including an EJ analysis in an appendix or technical report that includes detailed data and figures. We suggest that the EJ report include figures that clearly show the locations of each census block group in proximity to ports, transportation routes, or other likely impacts and that the report include tables of demographic data and data regarding exposure burdens for each potentially impacted onshore area by census block group. |
| BOEM-2022-0025-TRANS-31-109 | Coralie Pryde | Individual | None | Environmental Justice | As a resident, I know that Delaware is already suffering measurably from sea level rise and the heavy rainstorms that come with climate change. This is affecting many people in downtown areas and people in the environmental justice community. |
| BOEM-2022-0025-TRANS-36-124 | Dave Arndt | Individual | None | Environmental Justice | At stake isn't just the electric mix, it's the future of human beings really on this planet. The power sector today is a leading source of cancer causing air pollution and the nation's largest source of carbon dioxide. If we do nothing to clean it up, we condemn ourselves of facing the worst consequences of climate change. So this is all about converting to really clean energy, and we need to move as forward as quickly as possible and converting to clean energy. |
| BOEM-2022-0025-TRANS-37-132 | Jenn Aiosa | Local agency | Baltimore County Executive | Environmental Justice | Baltimore county is the third most populous jurisdiction in Maryland. We are home to more than 850,000 residents, and unfortunately, many of these residents live in neighborhoods and communities that are particularly vulnerable to the impacts of climate change. We're seeing sea level rise that has begun to really diminish our tidal shorelines, bringing water further inland, and extreme weather that is causing historical and devastating floods, damaging bridges, roadways, homes, and other infrastructure. We are also seeing excessive heat that has exacerbated health issues in our urbanized areas. And unfortunately, Maryland's first heat related death this year was a Baltimore County resident who was only 65 years old. These life threatening weather events are only going to get worse and continue to cost Marylanders unless our leaders work together to decarbonize our energy mix, increase energy efficiency, and invest in large scale renewable energy products like the one we're discussing today. |
| BOEM-2022-0025-TRANS-38-136 | Kerrie Bunting | Local agency | Ocean Pines Chamber of Commerce | Environmental Justice | This is not Baltimore City. This is not Anne Arundel. These are my people. I'm just trying to protect them. |
| BOEM-2022-0025-TRANS-43-179 | Janice Proctor | Individual | None | Environmental Justice | So I'm hoping that this will positively impact our communities and the people living and working here and especially low income communities and not just the touristy areas of Worcester County or the higher income places. |
| BOEM-2022-0025-TRANS-44-148 | Pamela Costanzi | Individual | None | Environmental Justice | I think the opportunity to have a project like this off the shore of Delaware and Maryland will have a great impact on our tidal communities. We live in low lying areas and with sea change and all the climate change that's going on, we're very concerned about storms and ugly. |
| BOEM-2022-0025-TRANS-45-152 | Jerry Mclaurin | Local agency | PFC Black Chamber of Commerce | Environmental Justice | And I just hope that the state of Maryland and US will find an opportunity to make sure that blacks have given the opportunity to be a part of the development and construction of this offshore wind. |
| BOEM-2022-0025-TRANS-56-185 | Kendrick Faison | Non-governmental organization | SpatialGIS | Environmental Justice | We want to say that the company has reached out to many minority companies, as you heard before, and explain this project and provide information regarding the support of birds, fish and other forms of marine life and Ocean City area. |
| BOEM-2022-0025-TRANS-56-187 | Kendrick Faison | Non-governmental organization | SpatialGIS | Environmental Justice | But more than I can say, that is to ensure that we have the opportunity for many minority firms to be a part of this conversation, that we will be able to take this opportunity to go on across this country, to be able to support this type of development across the country as we've seen. |
| BOEM-2022-0025-TRANS-57-188 | Sandra Pruitt | Non-governmental organization | People for Change Coalition | Environmental Justice | We are a membership organization representing over 300 nonprofits and minority businesses in Prince George's County, Charles County, Baltimore, and the Eastern Shore. But what I really want to touch on is I see this offshore wind project being a huge opportunity to engage our youth on the Eastern Shore and expose them to renewable energy projects and for them to learn about offshore wind. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-TRANS-57-190 | Sandra Pruitt | Non-governmental organization | People for Change Coalition | Environmental Justice | In addition, we also plan to bring a civic engagement project to the Eastern Shore. And when I saw the screen that talked about all the different agencies involved in this project, from the federal level to the state and local, I think it's important that our young people understand how all these agencies are connected and work and all the policies and procedures that have to occur before bringing a project of this magnitude to the Eastern Shore. start with our middle school students because we know the project is coming so that they understand the impact to their environment and the community. |
| BOEM-2022-0025-DRAFT-0165-641 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Finfish, Invertebrates, and Essential Fish Habitat | Provision of high-resolution benthic habitat maps early in the process is important for evaluating impacts and considering how to best minimize impacts. These data are needed for the essential fish habitat consultation process, which is designed to avoid impacts wherever possible and determine mitigation measures where impacts cannot be avoided. |
| BOEM-2022-0025-DRAFT-0165-648 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Finfish, Invertebrates, and Essential Fish Habitat | Installation of cables and foundations for turbines and offshore substations will generate both noise and sediment plumes, which may affect biological processes for marine species. The EIS should acknowledge that both demersal and pelagic species may also be impacted by the noise and vibrations generated from construction activities and may change their behavior and/or feeding patterns to avoid the impacted area. This is not a negligible impact even if it may not be a population-scale impact, and it can impact fisheries. The impacts analysis, including the EFH assessment, should consider how installation during different seasons will affect particular species and life stages during spawning, juvenile settlement, etc. |
| BOEM-2022-0025-EMAIL-275-851 | Michael Pentony | Federal agency | NMFS | Finfish, Invertebrates, and Essential Fish Habitat | The description of the “Affected Environment” should also recognize the ocean environment as dynamic, not static, and acknowledge that the environment, and species within the environment, vary over time and seasons. This section should include information on the physical (temperature, salinity, depth, and dissolved oxygen) and biological (e.g. plankton) oceanography.<br>It is important that the EIS discuss seasonal changes and long-term trends in the environment as well as hydrodynamic regimes and how they influence the distribution and abundance of marine resources. Within this section, the EIS should include results of on-site surveys, site-specific habitat information, and characterization of benthic and pelagic communities. Additional details should be provided related to all habitat types located in the project area that may be directly or indirectly impacted by project construction and operation, including complex habitats and prominent benthic features in the project area, as described above.<br>The “Affected Environment” section should also include all of the biological, cultural, and socioeconomic issues related to fisheries and marine resources that may be affected by this project, including species that live within, or seasonally use, the immediate project area and adjacent locations. For benthic resources, fish, and invertebrate species, this section should include an assessment of species status and habitat requirements, including benthic, demersal, bentho-pelagic, and pelagic species and infaunal, emergent fauna, and epifaunal species living on and within surrounding substrates. |
| BOEM-2022-0025-EMAIL-275-863 | Michael Pentony | Federal agency | NMFS | Finfish, Invertebrates, and Essential Fish Habitat | When evaluating the impacts of various project activities and IPFs, it is important for the EIS to fully discuss both direct and indirect impacts on marine resources. Emerging information demonstrates the importance of considering effects of energy extraction on atmospheric processes and the effects of in-water structures on oceanographic conditions, and how both of those effects carry over to marine species and habitats. The presence of structures is likely to result in both local and broader oceanographic effects, and may disrupt aggregations and distribution of prey species, alter the strength of tidal currents and associated fronts, and may<br>change primary production, the degree of mixing, and stratification in the water column.5 |
| BOEM-2022-0025-EMAIL-275-867 | Michael Pentony | Federal agency | NMFS | Finfish, Invertebrates, and Essential Fish Habitat | In addition to focused evaluations on protected species, fish, invertebrates, and habitats, the “Environmental Consequences” section of the EIS should include a subsection evaluating impacts to commercial and recreational fisheries. |
| BOEM-2022-0025-EMAIL-275-882 | Michael Pentony | Federal agency | NMFS | Finfish, Invertebrates, and Essential Fish Habitat | As currently described in the NOI, these facilities (inclusive of the wind farm areas, offshore and inshore export cables and corridors, and shore side landing points) will be constructed, operated, and maintained in areas designated EFH for various life stages of species managed by the New England Fishery Management Council (NEFMC), Mid-Atlantic Fishery Management Council (MAFMC), and NMFS. Species for which EFH has been designated in the project area include, but are not limited to Atlantic butterfish, Atlantic mackerel, black sea bass, bluefish, longfin inshore squid, red hake, summer flounder, scup, windowpane flounder, witch flounder, yellowtail flounder, clearnose skate, winter skate, Atlantic sea scallops, spiny dogfish, Atlantic surfclam, and others. The proposed project area is also designated EFH for a number of Atlantic highly migratory species (tuna, swordfish, billfish, small and large coastal sharks, and pelagic sharks) including, but not limited to sandbar shark, sand tiger shark. and dusky shark. Both the sand tiger shark and dusky shark have been listed as a Species of Concern by NOAA. |
| BOEM-2022-0025-EMAIL-275-883 | Michael Pentony | Federal agency | NMFS | Finfish, Invertebrates, and Essential Fish Habitat | The NEPA document, in particular, the EFH, benthic resources, finfish and invertebrates sections, should accurately describe the project area and the resources that rely on habitats that are susceptible to project impacts. The document should fully describe the distinct habitat features of the entire project area and the importance of different habitat types for providing structure and refuge, as well as habitats important for eggs, larvae, and juveniles. The evaluation of project impacts should not only consider impacts of the project against the cumulative geographic scope (e.g. the OCS), but also clearly evaluate anticipated impacts of project construction, operation and maintenance, and decommissioning to the distinct habitat types found in the lease area, along the export cable route, and inshore landfall/inland locations. The document should analyze the effects to the physical and biological habitat features and the biological consequences of those effects. It will be important to consider impacts of the project on all life stages (adults, juveniles, larvae, eggs), and we recommend focusing on species and life stages that may be more vulnerable to impacts. |
| BOEM-2022-0025-EMAIL-275-884 | Michael Pentony | Federal agency | NMFS | Finfish, Invertebrates, and Essential Fish Habitat | Habitats that support particularly sensitive life stages of species should be identified and described. For example, species with demersal eggs or neutrally buoyant larvae are particularly sensitive to actions such as dredging and trenching. It is important that the EIS fully describe and analyze impacts of the project on vulnerable life stages of any NOAA trust resource and evaluate ways to avoid and minimize those impacts. If it is not feasible to avoid or minimize negative impacts, mitigation measures must be proposed and analyzed.<br>We would also note that impacts to complex habitats and benthic features are known to result in long recovery times and are potentially permanent. Such impacts may result in cascading long-term to permanent effects to species that rely on this area for spawning and nursery grounds and the fisheries and communities that target such species. Complex habitats19, such as gravels and gravel mixes, and sand waves and ridge complexes, are particularly sensitive and vulnerable to impacts as disturbances or alterations of these areas can impact both the physical and biological components of these habitats. Impacts to physical (e.g. structure - three-dimensional structure, surface area, crevices) and biological (e.g. infauna and epifauna) components may be permanent or long-term, typically taking years to decades for recovery. Furthermore, large expanses of natural soft bottom and their associated communities are also vulnerable to the permanent impacts of removal/elimination through conversion to artificial anthropogenic structure (e.g., monopiles and concrete mattresses) and hard masonry/quarry stone (e.g., for scour protection). The evaluation of impacts from project construction, operation and maintenance, and decommissioning should evaluate the potential for recovery and the anticipated recovery times based on the habitat type and components that would be impacted. The variability in recovery times by habitat type and components should be fully discussed and analyzed in the document. |
| BOEM-2022-0025-EMAIL-275-886 | Michael Pentony | Federal agency | NMFS | Finfish, Invertebrates, and Essential Fish Habitat | Under the FWCA, our authority extends to numerous other aquatic resources in the area of the proposed project, including, but not limited to, the following species and their habitats: striped bass, American shad, alewife and blueback herring (collectively known as river herring), Atlantic menhaden, Atlantic silversides, Eastern oyster, northern quahog, blue mussel, horseshoe crabs, blue crabs, tautog, weakfish, and other assorted fish and invertebrates. NOAA jointly manages a number of these species through Interstate FMPs with the Atlantic States Marine Fisheries Commission. A list of Commission species and plans can be found on their website at http://www.asmfc.org.<br>We anticipate all of these species will be included in your impact assessments, both in the EFH Assessment and NEPA document. We also expect the assessment to include impacts to the re<br>creational and commercial fishing communities that rely on these species. The behaviors and habitat needs of diadromous and estuary-dependent fishes (associated with cable route locations) may not be represented by a discussion solely of the surrounding marine fishes in the WTG area. The discussion for FWCA species should be designed around an ecological guild model that uses locally important species to evaluate the project impacts to organisms or populations associated with the various trophic levels and life history strategies exhibited by FWCA species known to occupy the project area as residents or transients. Focus should be on issues surrounding particular species, life history stages, or habitat components that would be most susceptible to the various potential project impacts. |

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| BOEM-2022-0025-TRANS-17-57 | Eric Burnley | Individual | None | Finfish, Invertebrates, and Essential Fish Habitat | And I definitely want to say that you got my attention when you said you were going to bring the transmission lines in on Three Rs Road, because that has been my favorite surf fishing spot for 50 years. The concern I have is the rumors are unfounded or unproven stuff that's out there about fish being run off or put away or whatever by electromagnetic fields created by these transmission lines. When you're talking about going through Indian River Bay, that is a very shallow piece of water. And the part where you're going across are Indian River Bay flats. They're no more than three or four foot deep all the way across. I am very concerned about what those transmission lines are going to have an effect on the fish in that very shallow water. I know you say they're going to be buried three to 7ft. I would like to see them buried a whole lot deeper. I understand that's the most direct route up to Millsboro, and I understand that that's probably the way they're going to go, but I am concerned about that. It is a very popular fishing area. Thousands of recreational fishermen use it. And if there's any chance at all that these transmission lines are going to destroy that fishery, I'm afraid we're going to have a lot of problems. |
| BOEM-2022-0025-TRANS-26-93 | Peggy Schultz | Non-governmental organization | Power People for Offshore Wind Energy Resources | Finfish, Invertebrates, and Essential Fish Habitat | Let's talk about fishing. My dad was a commercial fisherman on the Pacific coast. From his little boat, the Sugar Plum, he ring netted the crabs in the winter, and in the summer, he trolled for salmon. From my experience as a fisherman's daughter, I know that these crabs and fish don't just jump out of the water into the hole of the fishing boat. They need to be lured onto the ring net or onto the hook of the trawler's line trailing alongside the boat. But what better to lure fish than crustaceans and little marine life that grow in the crevices and hiding places formed by the rocks and and hiding places formed by the rocks and foundations that support offshore wind turbines. |
| BOEM-2022-0025-TRANS-26-95 | Peggy Schultz | Non-governmental organization | Power People for Offshore Wind Energy Resources | Finfish, Invertebrates, and Essential Fish Habitat | As you know, Block Island, off the Rhode Island coast, has five offshore wind turbines that offer researchers a chance to see up close and personal what effect offshore wind turbines have on fishing. A seven year study shows no difference in the availability of most fish near the turbines, but an increase in cod and Black Sea bass. This study, jointly designed by scientists and commercial fishermen, Before construction of the wind farm, you might see ten to 15 boats in the area, the report says. After the wind turbines went in, you'd see 30 to 40 boats in the area. Dave Clark, a fisheries expert with the Delaware Department of Natural Resources and Environmental Control, confirms that both Black Seabass and Talco found off Delaware are very structure oriented. |
| BOEM-2022-0025-TRANS-36-130 | Dave Arndt | Individual | None | Finfish, Invertebrates, and Essential Fish Habitat | Europe has implemented migration programs which can however, against the biggest threat to population due to climate change issues like temperature rise, acidification, and the Gulf Stream weakening, this is a bigger potential harm to our fishing population. |
| BOEM-2022-0025-DRAFT-0002-209 | J L | Individual | None | General Support or Opposition | I am very much in support of this offshore wind energy project. |
| BOEM-2022-0025-DRAFT-0003-213 | peter mccullough | Individual | None | General Support or Opposition | More wind turbines, please. More solar panels, please. More efficiency. Less consumption. Enough said. |
| BOEM-2022-0025-DRAFT-0006-217 | Stephanie Flores | Individual | None | General Support or Opposition | I fully support infrastructure to encourage green energy and reduce our dependence on fossil fuels. It's crucial for our survival. Build offshore wind farms off Maryland's coast, |
| BOEM-2022-0025-DRAFT-0009-220 | L Strott | Individual | None | General Support or Opposition | As an Ocean Pines homeowner and beach lover, I fully support this wind proposal. Any claims that they are unsightly, kill birds, cause cancer are ludicrous. Please pass this proposal to protect our beaches. Thank you. |
| BOEM-2022-0025-DRAFT-0010-221 | Janine Holc | Individual | None | General Support or Opposition | It is urgent to support this project. As a Maryland resident and voter, I feel very strongly that our state must move forward on addressing climate change and the shift from coal to wind energy. I teach young people, and our youth are in despair about their future on our planet. We have not given them anything to hope for. This is a sound project, financially feasible, future-oriented, and I urge you to move forward with it. |
| BOEM-2022-0025-DRAFT-0011-222 | Edward Larkey | Individual | None | General Support or Opposition | I believe that an offshore wind energy facility in Maryland oceanic waters is a positive step in the right direction for expanding renewable energy resources in the US and especially on the East Coast. Many other countries are constructing large wind farms off the coasts of various continents, thus increasing the amount if renewable energy connected to the electric grid of both national and regional energy networks. |
| BOEM-2022-0025-DRAFT-0012-226 | Charlene Hesse | Individual | None | General Support or Opposition | I fully support this. We must invest in clean energy and shut down all coal fired plants. |
| BOEM-2022-0025-DRAFT-0013-227 | Charles Meneveau | Individual | None | General Support or Opposition | I am strongly in favor of approving the wind energy facility off the coast of the Eastern Shore of Maryland. |
| BOEM-2022-0025-DRAFT-0014-230 | Chauna Brocht | Individual | None | General Support or Opposition | As a frequent visitor to the Eastern Shore beaches, I do not believe the wind turbines will interfere with the view. I'm also a frequent visitor to Western MD and the wind turbines are not unsightly. I 100% support offshore wind. |
| BOEM-2022-0025-DRAFT-0018-234 | Erica Howard | Individual | None | General Support or Opposition | I am a resident of Wicomico County MD and concerned mother and nurse on the Eastern Shore. I am concerned about the health of the planet and my children's future. I am in favor of the proposed wind energy project off the shore of Ocean City, MD. We need to encourage these projects and more everywhere we can. My husband is an avid fisherman and is definitely in favor of the increased habitat this project would create for fish, like black sea bass and tautog. Since fishing is a draw for so many in Ocean City, this should be an obvious bonus to something that is already going to have so many benefits. The very minor impact this will have on any view, will, more than likely, be something of interest to visitors and a draw for those concerned about our climate. The long term benefits of this and other projects like it, will show younger generations that their local government is invested in their future. |
| BOEM-2022-0025-DRAFT-0022-243 | Lee Hudson | Non-governmental organization | Evangelical Lutheran Church in America, Delaware-Maryland Synod | General Support or Opposition | Our faith community adopted a teaching document in 1993 about caring for the created world ("Caring for Creation," ELCA social statement). It supports an ethos of stewardship of natural gifts on behalf of sustainable and equitable blessings from creation. In it, greenhouse gases are identified as environmental pollutants and threats to created goodness due to their deleterious effects on climate.<br>Our community has supported reducing greenhouse emissions by accelerating renewable energy sources in Maryland's energy regime for several decades of Maryland General Assembly sessions. We have supported development of offshore wind farming for Maryland public energy production since the prospect was first announced.<br>Early concerns about appropriate environmental, wildlife, and siting disposition appear to have been completed, and it is our understanding that the plan being evaluated during this public comment indicates that benefits exceed harms.<br>Our position is that greenhouse gas reduction is an urgent task because the opportunity to prevent the worst climate crises is disappearing rapidly. The cost of doing nothing already exceeds the cost of a cleaner energy regime. For that reason, we support the U.S. Wind Proposed Wind Energy Facility (listed, Docket 2022-0025) and ask a favorable report. |
| BOEM-2022-0025-DRAFT-0024-258 | Pamela Winston | Individual | None | General Support or Opposition | I'm a resident of Silver Spring, MD, and a frequent visitor to Ocean City, MD. I'm writing in favor of expanding offshore wind in Maryland, and in support for BOEM moving the Maryland Offshore Wind project forward as expeditiously as possible. |
| BOEM-2022-0025-DRAFT-0030-268 | Robert Aubry | Individual | None | General Support or Opposition | We are very much opposed to the wind energy facility as it is currently proposed.<br>1. Horribly ugly wind turbines<br>2. VERY costly to generate energy<br>3. VERY costly to maintain<br>4. 12 miles is too close to the shoreline and will ruin the view.<br>5. Mishaps, Breakdowns and Accidents: there is an extensive list of these.<br>6. Clean US natural gas is by far the best option to produce low cost reliable electricity |
| BOEM-2022-0025-DRAFT-0044-289 | Jon Chapman | State agency | Maryland Environmental Trust | General Support or Opposition | The Maryland Environmental Trust has no authority to comment on matters that do not directly impact any property on which we hold a conservation easement. Therefore, we cannot comment on the merits or drawbacks of the US Wind Offshore Wind Energy Project. As far as we are able to assess, it will in no way touch or otherwise measurably impact any properties that we encumber in Maryland. |
| BOEM-2022-0025-DRAFT-0045-290 | Basil Hanlon | Individual | None | General Support or Opposition | I am against BOEM allowing wind turbines to be installed off the coast of Ocean City, Md and Fenwick Island, DE. Why can they not be placed 20 miles from the shoreline? |
| BOEM-2022-0025-DRAFT-0045-291 | Basil Hanlon | Individual | None | General Support or Opposition | There is an environmental cost to wind turbines both in operation and manufacturing. . Noise, visual impacts, sea floor changes, migration of mammals, etc. Wind turbines kill birds, bats and effect migration patterns of other animals/mammals - those are facts. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0046-292 | Victoria Venable | Non-governmental organization | Chesapeake Climate Action Network | General Support or Opposition | We support the US Wind project and urge BOEM to complete a thorough and expeditious environmental impact review. |
| BOEM-2022-0025-DRAFT-0057-327 | Anonymous Anonymous 7 | Individual | None | General Support or Opposition | As you prepare the EIS, I wanted to share my opinion about the proposed wind facility off the coast of Ocean City. I am a full-time resident of Worcester County and frequent the beaches with my family year round. I am excited that our state would meet it's energy goals by approving the construction of the turbines. I also look forward to seeing them off the coast and pointing them out to my children to continue a conversation about energy, it's origins, and the science behind each source |
| BOEM-2022-0025-DRAFT-0059-331 | Colleen Wilson | Individual | None | General Support or Opposition | I have strong concerns regarding this project. It is unfortunate that our federal government is not exploring less expensive means of supplying clean energy but rather assisting FOREIGN companies industrialize and ultimately bring irreparable harm to our ocean environment. |
| BOEM-2022-0025-DRAFT-0065-339 | Brendan Sweeney | Individual | None | General Support or Opposition | Same comment as presented in BOEM-2022-0025-DRAFT-0064 |
| BOEM-2022-0025-DRAFT-0070-354 | Michael Walsh | Individual | None | General Support or Opposition | I am writing in support of US Wind's proposed wind energy facility. Sustainable energy is of vital importance in the US as climate change brought about by over dependence on fossil fuels among other causes becomes a worsening situation. I have read the environmental mitigation steps US Wind is taking and am impressed with their commitment to as little impact as possible. Their efforts to reduce the undersea sound during construction as well as the intent to use smart technology to lessen the lighting disturbance at night, are solidly science based. I am an avid bird enthusiast and president of the only birding organization in this area. While I am writing as an individual, I've had conversations with all our members and they are in favor of the project. Of course there will be some impact to migratory avian life but the plan shows a significant effort to minimize the damage. Birds are adaptable creatures and they will learn to avoid the structures. Studies in the facilities in European waters have borne this out. The reduced lighting measures and the proposed placement of the structures, as well as the fact that birds can hear the turbines are all reasonable offsets to potential harm. My associates who are also recreational fishermen tell me they are excited about the fishing "magnets " that the structures will become. And, of course, the employment opportunities the project supports are very important. Sustainable energy, positive environmental impact, minimal damage to wild life, jobs, a clean alternative to fossil fuels…all add up to a worthwhile project. What could counter the positives? The view??I believe the argument that wind turbines some 12 miles offshore will have a negative impact on tourism or real estate values is completely specious. They'll be invisible from ground level, and probably would require a scope to be seen from above. If the crowd noise, the traffic noise, the garish lighting , the banner planes, etc. are all a normal part of the allure of a resort town, this project's visual impact will be practically nonexistent. Thank you for the opportunity to write in favor of US Wind's Proposal. |
| BOEM-2022-0025-DRAFT-0079-373 | Anonymous Anonymous 10 | Individual | None | General Support or Opposition | The Hypocricy of the entire situation reverts back to the fact that this wind company is going to damage the last pristine part of a Delaware beach. You do not need to dig up this beach, ruin the fishery disrupt the summer to do good for the environment. The mere fact that you can go through the inlet or through an already populated area make a tremendous amount of sense versus no disrupting the precious commodity you claim you are trying to save. Pathetic, most hypocritical situation. I suggest you take time and figure this out. |
| BOEM-2022-0025-DRAFT-0081-379 | Anonymous Anonymous 11 | Individual | None | General Support or Opposition | US Wind has been very responsive and informative over the last several months. At the University of Delaware (UD) we have two key projects focused on "workforce & wind" and "robotics & research". US Wind has participated in several meetings/events to learn more about UD's initiatives and update our stakeholders on US Wind's progress. We see Southern Delaware becoming a BlueTech Cluster and US Wind's participation is very important for the Southern Delaware/Delmarva area. |
| BOEM-2022-0025-DRAFT-0087-401 | David Quillin | Individual | LEED BD&C | General Support or Opposition | I am writing to strongly support the U.S. Wind offshore wind energy project. As an architect, I have taken an oath to support the health and well-being of the public. As such, I am obliged to fight to get our society away from non-renewable energy sources which are not sustainable or ethical. Wind power is a fantastic source with multiple benefits, and I urge you to approve. Much resistance to the project has come from objections to the appearance of the turbines. I am mystified by this. When I lived in California, people took trips to sight-see at the wind farms there. There were always people picnicking under the turbines. To the extent the turbines will be visible off of Ocean City (which is minimal), they will be an attraction, not a detraction. Rhode Island saw its coastal tourism go up after their offshore wind project was installed. I also question the sincerity of objections to any change in the view from the same people who are fine with floating electronic billboards, banner planes, high-rise beach condos, and advertising blimps. It is important to carefully weigh any change to a public view shed, but experience has shown the minimal impact the turbines will have on the view will be positive. Thank you for considering this input. David D. Quillin, AIA, LEED BD&C |
| BOEM-2022-0025-DRAFT-0091-411 | Mary Mullan | Individual | None | General Support or Opposition | I am strongly opposed to US Wind's or any other similar or related company's construction of a Wind Energy Facility off the coast of Maryland and Delaware. I think it is imperative that further in depth and comprehensive studies are conducted to determine the impact on those resources that are mentioned under the Summary of Potential Impacts contained in the Environmental Impact Statements; Availability, etc.: US Wind's Proposed Wind Energy Facility offshore Maryland. Delaware has done an excellent job of protecting its coastline and the surrounding environment. I would hate to see all of that hard work and dedication destroyed by a rushed and potentially very dangerous decision made without knowing all of the facts. Please take the time to really research what implications will be to wildlife. Don't be forced into making a knee jerk decision based upon current pressures associated with climate change. Let's make sure we are doing the right thing for not only us but for our wildlife. |
| BOEM-2022-0025-DRAFT-0094-419 | Carroll McGill | Individual | None | General Support or Opposition | I am opposed to the wind farm being installed off of our beach. This will de-value our property and ruin our view of the beautiful ocean. When the turbines break that they are just abandoned and not fixed and they are not truly a good source of energy. Our community will fight this project. |
| BOEM-2022-0025-DRAFT-0098-432 | Forrest Walker | Individual | None | General Support or Opposition | I am having a great deal of trouble with a Maryland initiative becoming a Delaware problem. How did this even come to pass? If the State of MD wants this than they should shoulder the burden of the entire project and it should affect their residents not the residents of DE. |
| BOEM-2022-0025-DRAFT-0100-438 | Carol Sottili | Individual | None | General Support or Opposition | I'm submitting this letter in support of US Wind's offshore wind farm site.<br>I live six months a year in Ocean City. I am a trained naturalist and avid birder who, as a volunteer, monitors horseshoe crab and diamondback terrapin populations for the state of Maryland. My community is bayfront, where rising tides have already caused some issues. And in other areas of Ocean City, flooding during storm surges often closes roads and damages dwellings. It's only going to get worse unless we do something.<br>In this day and age, we need to look at the good of the entire community, not just the interests of a few wealthy individuals who are worried about their view corridors. Additionally, I firmly believe these fears of view impacts is misplaced: These turbines will be mere spots on the horizon. Change is rarely embraced, especially when someone who has no particular interest in the society at large is hellbent on maintaining the status quo. As someone who sits on the beach much more than I probably should, I also thought long and hard about having wind turbines in my distant view: I concluded that the value this project brings is so much more important that a slight change in my reality as I gaze at the horizon.<br>US Wind has done its homework. I was initially very worried about its impact on migratory birds, but the wind farm has been sited far enough offshore to mitigate impacts on birds, but close enough not to harm migrating whales. It's also worked with anglers to ensure that livelihoods and hobbies are not negatively impacted.<br>Finally, this project will bring jobs to the area while helping to supply clean energy to thousands. It's a win-win-win for everyone. Even the select few who don't want this wind farm will likely realize soon after its installation that their fears were overstated. |
| BOEM-2022-0025-DRAFT-0102-444 | James Rapp | Individual | DelMarva Birding Weekends | General Support or Opposition | I write to you today in support of wind turbines off Maryland's coast…..I've seen in the papers cries from Rep. Harris and Ocean City's old guard to stop it. They are wildly outnumbered. Please make this happen. |
| BOEM-2022-0025-DRAFT-0106-462 | Dennis OBrien | Individual | None | General Support or Opposition | Until the full impact to our fragile coastal ecosystem and economic concerns of impacted citizens, property owners and business owners, as well as those who enjoy the beauty of this coastal area are fully addressed, BOEM, as the steward of these important resources, should not move forward with any further action of this project. Failure to do so would be an abdication of BOEM's stated mission. |
| BOEM-2022-0025-DRAFT-0107-463 | James H. Paylor Jr. | Non-governmental organization | International Longshoremen's Association | General Support or Opposition | As the Assistant General Organizer of the International Longshoremen's Association (ILA) and the Chairman of the ILA's Offshore Wind Committee, I write in support of the proposed offshore wind facility offshore Maryland. The ILA believes that the proposed facility offshore Maryland is beneficial not only to the states of Maryland and Virginia but also to the nation as a whole and strongly urges the Bureau of Ocean Energy Management to approve the project. |
| BOEM-2022-0025-DRAFT-0109-469 | Eric Levinson | Individual | None | General Support or Opposition | I have read the true facts on this project and I have decided to vehemently oppose the US Wind Energy project. |
| BOEM-2022-0025-DRAFT-0111-473 | Stuart Bowers | Individual | None | General Support or Opposition | I very much support wind power to reduce our needs for carbon based fuel, however we must not upset the thriving economy of our coastal towns. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0118-500 | Robert Taylor | Individual | None | General Support or Opposition | I oppose US Wind's offshore wind farm. It would have no benefits for the residents of Delaware. |
| BOEM-2022-0025-DRAFT-0121-513 | Mark Ramsay | Individual | None | General Support or Opposition | Regarding the development of your environmental impact statement, please find a newspaper article in "The Epoch Times," June 29, 2022, "Biden's Plan to Promote Green Energy Will 'End in Tears,' Expert Warns," p. A8. This article title paraphrases a quote by Rice University energy economics professor Peter Hartley. This article reinforces my June 23 testimony that following Germany's lead, which is what the US is doing, will end up with disappointing results. |
| BOEM-2022-0025-DRAFT-0123-515 | Scott Hymes | Individual | None | General Support or Opposition | I fully support US Wind's Proposed Wind Energy Facility offshore in Maryland. |
| BOEM-2022-0025-DRAFT-0124-516 | Greg Venit | Individual | None | General Support or Opposition | I'm a property owner on Indian River and I'm against having a electric power cable buried for 6 to 7 miles across the Indian River. |
| BOEM-2022-0025-DRAFT-0127-529 | Derrek Dunn | Individual | None | General Support or Opposition | I support this project. It will allow the State of Maryland to be a leader in offshore wind energy. |
| BOEM-2022-0025-DRAFT-0129-531 | charles ott | Individual | None | General Support or Opposition | I'm very concerned about the potential offshore windmills to be placed off of Bethany Beach. I'm concerned about the impact to the environment, aesthetics and property values. I'm 100% opposed to this. |
| BOEM-2022-0025-DRAFT-0134-548 | Katherine Klausmeier | State agency | Maryland State Legislator | General Support or Opposition | I am writing in support of US Wind's Proposed Wind Energy Facility to be located offshore of Maryland. This new project will not only help address climate change, but will also bring new, well-paying jobs to the state. Climate change is a crisis that we need to address immediately. The General Assembly's bold leadership and commitment to procurement of offshore wind energy for a clean energy future will meet our state's Renewable Portfolio Standard and climate pollution reduction goals, and also significantly revitalize our economy by attracting a new job-creating industry to Maryland with work done by minority-owned businesses, union labor, and many others. We need to develop as much offshore wind power as possible as quickly as possible to combat the challenges of climate change. As a result of this global crisis, we have been experiencing the severe storms, floods, and tornados. We need bold action to fight this threat and offshore wind energy can be a big part of the solution. |
| BOEM-2022-0025-DRAFT-0141-566 | Willard Culver | Individual | None | General Support or Opposition | I am a resident in tower shores beach community. I am writing to ask you to consider several points before you approve the wind farm. One.. no important research was done into studying how this will affect marine life in the ocean. We can't be that irresponsible to other life; Two.. how close and unsightly this will be. How that will affect home value and people who rent; Three..this doesn't help Delaware……jobs and energy will go to MD. |
| BOEM-2022-0025-DRAFT-0161-626 | Keith McGuire | Individual | None | General Support or Opposition | I am in full support of the U.S. Winds construction operation plan to move forward with providing off shore wind to the State of Maryland. |
| BOEM-2022-0025-DRAFT-0167-654 | Anna Fendley | Non-governmental organization | United Steelworkers | General Support or Opposition | Sparrows Point Steel has the opportunity to be a large staging port for offshore wind on the east coast, but that hinges on the approval of US Wind's COP for a wind energy facility offshore Maryland.<br>USW urges BOEM to swiftly complete the Environmental Impact Statement (EIS) and associated consultations to approve US Wind's COP without delay. This will help ensure the success of Sparrows Point Steel and will contribute to the Biden Administration's goals on offshore wind development. |
| BOEM-2022-0025-DRAFT-0169-659 | Thomas Lemon | Individual | None | General Support or Opposition | I am strongly against this proposed legislation. There is very little benefit to moving forward with these windfarms and it will be terrible for the Environment.<br>Please do not move forward with this legislation. |
| BOEM-2022-0025-DRAFT-0179-683 | Kathleen Campanella | Individual | None | General Support or Opposition | While, in theory, wind farms may be a good idea such projects must always account for their many downsides, including impacts on the Delaware environment, Delaware property values, the beauty and integrity of the Delaware coastline, and the health of its residents. This project does not do so. I'm asking for your help to encourage these private companies to change the project to account for environmental, commercial, and citizen concerns — or stop the project if they will not do so. During a July 7 hearing, U.S. Wind and Ørsted, the developers for these wind energy projects, explained their plans. Neither had answers — let alone good ones — for the many problems with the proposal, or explanations about why alternatives might be infeasible, financially or otherwise. There may be a path forward for these projects, but the one that we heard from the developers doesn't make sense. |
| BOEM-2022-0025-DRAFT-0181-689 | Charles Stegman | Non-governmental organization | Wicomico Environmental Trust | General Support or Opposition | The Wicomico Environmental Trust views the proposed US Wind project off the shore of Maryland as a key step in that transition for this region. We particularly appreciate the care with which US Wind has proceeded in developing its Construction and Operations Plan, including its substantial funding of independent University of Maryland research to avoid collateral impacts on the existing environment. We continue to support this project with enthusiasm. |
| BOEM-2022-0025-DRAFT-0182-690 | William Truitt | Non-governmental organization | Cotton Patch Hills Association, Inc. | General Support or Opposition | This initial comment letter and its attachments are submitted to the Bureau of Ocean Energy Management ("BOEM") on behalf of the Cotton Patch Hills Association, Inc.("Cotton Patch Residents"), a non profit community association representing 65 homeowners in North Bethany, Delaware. The Cotton Patch Residents are located less than one mile south of the proposed export cable landfall for the above-referenced project. For the reasons set forth below and to be supplemented at a later date, the Cotton Patch Residents vigorously object to the proposed location of the US Wind turbines, the export cable landfall at 3 R's Road and the proposed installation of 10 miles of submarine cable in Indian River Bay, a unique and threatened estuary they use for fishing, crabbing, swimming and boating. |
| BOEM-2022-0025-DRAFT-0185-707 | Leonard Boyd | Individual | None | General Support or Opposition | I am in support of The Construction and Operations Plan (COP) that US Wind has submitted to the Bureau of Ocean Energy Management (BOEM). As a small business owner, I feel that the plan is inclusive of small and diverse businesses, and will add value to the local economy. I feel it also considers and addresses the environmental impact that the project will have. |
| BOEM-2022-0025-DRAFT-0187-712 | John Donofrio | Individual | None | General Support or Opposition | While, in theory, wind farms may be a good idea such projects must always account for their many downsides, including impacts on the Delaware environment, Delaware property values, the beauty and integrity of the Delaware coastline, and the health of its residents. This project does not do so. I'm asking for your help to encourage these private companies to change the project to account for environmental, commercial, and citizen concerns — or stop the project if they will not do so. During a July 7 hearing, U.S. Wind and Ørsted, the developers for these wind energy projects, explained their plans. Neither had answers — let alone good ones — for the many problems with the proposal, or explanations about why alternatives might be infeasible, financially or otherwise. There may be a path forward for these projects, but the one that we heard from the developers doesn't make sense. |
| BOEM-2022-0025-DRAFT-0188-717 | Mike Figiel | Individual | None | General Support or Opposition | Hello, I'm a homeowner in north Bethany Beach DE, and i think it's great that this windfarm is being built offshore to provide clean energy. The US needs more projects like this to get off fossil fuels. US Wind & Orsted have done a lot of excellent work, research, preparation, investigation and planning to implement the best possible project with the minimal impacts to the environment, local wildlife and the beach areas. There has been a lot of misinformation and exaggerated claims going around, that isnt based on facts. They should be ignored and the project should move forward. |
| BOEM-2022-0025-DRAFT-0189-721 | Susan Stevens Miller | Non-governmental organization | Earthjustice | General Support or Opposition | Offshore wind energy provides many benefits, including economic development, stable prices, cleaner air, and less global warming pollution. The US Wind Application which is the subject of this NOI offers significant benefits. Development of this project can occur without sacrificing other aspects of Maryland's environment. Offshore wind projects can and must be constructed in a manner that considers and protects the surrounding environment. BOEM must continue to ensure that the environment is not harmed by the construction and operation of offshore wind projects. |
| BOEM-2022-0025-DRAFT-0190-722 | Lori Weinstein | Individual | None | General Support or Opposition | Seven attachments were sent that comprise my comment letter regarding the wind farm projects off the Delaware beaches. These included 5 comments, including: 1) Visibility of the Turbines; 2) Onshoring in Delaware; 3) Lighting; 4) Property Values; and 5) Location and Height of the Turbines. |
| BOEM-2022-0025-DRAFT-0192-725 | David Dempsey | Individual | None | General Support or Opposition | I write to you as a concerned Delaware resident about the development of several wind farms off the coast of Ocean City, Maryland and Southern Delaware. While, in theory, wind farms may be a good idea — clean energy, from a renewable source, at a time of climate crisis — their development in general, and these projects in particular, must always account for their many downsides, including impacts on the Delaware environment, Delaware property values, the beauty and integrity of the Delaware coastline, and the health of its residents. This project does not do so. I'm asking for the Bureau of Ocean Energy Management's help to ensure that this project accounts for environmental, commercial, and citizen concerns — or to stop the project if U.S. Wind and Ørsted are unwilling to do so. |
| BOEM-2022-0025-DRAFT-0200-751 | Peter McLean | Individual | None | General Support or Opposition | Please well consider the merits of wind energy. Given the urgent challenge of climate change, we have little choice, and we must respond with wind and other renewables which pollute little and sustain all life. Thank you for your consideration. Sincerely, Peter McLean, Ph.D. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-EMAIL-274-832 | Sam Salustro | Non-governmental organization | Business Network for Offshore Wind | General Support or Opposition | The Network supports BOEM's deliberate consideration and commitment to environmental protection, including during the development of the US Wind EIS. The Network also encourages BOEM to continue moving the US Wind Offshore Wind project forward through the federal permitting process so that it can commence operations and avoid delays. By meeting permitting and project timelines, BOEM will foster greater certainty in the U.S. offshore wind market and help ensure the U.S. keeps pace in the fast-growing offshore wind supply chain. In this way, BOEM directly advances the Biden Administration's goal of deploying 30 GW of offshore wind capacity by 2030. |
| BOEM-2022-0025-TRANS-1-1 | Kim Quillin | Non-governmental organization | Salisbury University, Henson School of Science and Technology | General Support or Opposition | So this wind project is an inspiration and opportunity for our program. I just want to commend you for this thorough evidence based process taking place to build this critical renewable energy source while minimizing impacts to our already taxed ecosystems. Thank you. |
| BOEM-2022-0025-TRANS-11-31 | Jonathan Phillips | Individual | None | General Support or Opposition | I have no formal affiliation. I am a part time resident of Worcester County. Setting aside any other consideration, I'd like to comment that if this project can be seen in any fashion from the coastline, then I and many residents of Worcester County with whom I have spoken, stand opposed to the project. |
| BOEM-2022-0025-TRANS-12-41 | Anna Fagan | Non-governmental organization | Delaware Center for the Inland Bays | General Support or Opposition | The center thanks him for the opportunity to speak in support of this project, and I yield the rest of my time. |
| BOEM-2022-0025-TRANS-13-42 | Mary Douglas | Individual | Private Practice, former EPA | General Support or Opposition | I strongly support the US Wind Energy Project. I applaud these projects. I suggest as well that they are approved and become operational. |
| BOEM-2022-0025-TRANS-14-47 | Lauren Brown | Individual | None | General Support or Opposition | I am a strong proponent of offshore wind. Renewable energy is the way of a sustainable future. With fossil fuels polluting our air and water, we need to scale up our development of wind and solar rapidly. This is an investment in our future and in our health. US Wind has taken extensive mitigation measures to decrease wildlife impacts with turbines. I was encouraged to see their sensitivity to seabirds and aerial avian data, as well as the cataloging of whales, sharks, large fish and sea turtles. I endorse the publicly available database with this information that they have proposed and underlined the importance of this work now and in the future. I also appreciate the gift of 11 million to um center for Environmental Science. |
| BOEM-2022-0025-TRANS-14-48 | Lauren Brown | Individual | None | General Support or Opposition | Renewable energy is the way of a sustainable future. This is an investment in our future and in our health. US Wind has taken extensive mitigation measures to decrease wildlife impacts with turbines. I was encouraged to see their sensitivity to seabirds and aerial avian data, as well as the cataloging of whales, sharks, large fish and sea turtles. I endorse the publicly available database with this information that they have proposed and underlined the importance of this work now and in the future. I also appreciate the gift of 11 million to um center for Environmental Science. With fossil fuels polluting our air and water, we need to scale up our development of wind and solar rapidly. This is an investment in our future and in our health. |
| BOEM-2022-0025-TRANS-15-52 | Charlie Garlow | Individual | None | General Support or Opposition | I'd like to say amen to all the other speakers who have spoken in favor of US wins proposal. Rather than repeating all the wonderful benefits to the environment, to the climate, to human health, to employment or labor friends, I would just like to suggest that we proceed, as one other speaker mentioned, with all due haste, because the climate is an urgent matter and we need to press forward as quickly as we can. |
| BOEM-2022-0025-TRANS-16-54 | Seth ?? | Individual | None | General Support or Opposition | So first of all, the resident of North Bethany, I am in support of alternative energy sources of any kind, including offshore wind. |
| BOEM-2022-0025-TRANS-18-58 | Bill Peel | Non-governmental organization | Calver Citizens for a Healthy Community | General Support or Opposition | We are basically located in Southern Maryland and are concerned about the environment and the impacts that various forms of energy production have on the environment. We're very much in favor of the US. Wind Project. We believe it is a solution, that a problem is growing every day. |
| BOEM-2022-0025-TRANS-19-63 | Mark Ramsay, P. E. | Individual | None | General Support or Opposition | I will explain how I find this wind farm's contribution to the global warming problem insignificant, not worth a high cost, and whatever risk to wildlife there would be. Using data from EPA's, NASA's and NOAA sites and doing some calculations, I find this the US. Has dropped power plant CO2 emissions by 21% over the last several decades. This hasn't done much to curtail global CO2 concentration because it's increased 12% over the same time and is accelerating CO2 growth in the atmosphere calculates to two times ten to ten power tons per year. This two gigawatt wind farm will contain 6 million tons per year, up to you two from power plants. Assume the farms would output an average of 50% of the two gigawatt capacity. We use 50% because farm power output is proportional to the Cuba wind speed. So how many of these wind farms would you need to retail global atmospheric cue two growth? 2800 is 2800 of them. |
| BOEM-2022-0025-TRANS-19-66 | Mark Ramsay, P. E. | Individual | None | General Support or Opposition | Without the farm making serious contribution to stemming CO2 growth, it has no reason for being considering lack of experience with offshore wind installations. |
| BOEM-2022-0025-TRANS-21-71 | Sam Salustro | Individual | None | General Support or Opposition | Offshore wind is a proven technology that's going to deliver reliable power to the energy grid both day and night, and will help transition the state to a cleaner energy future, all while creating good paying jobs. The work being done here by the public servants at BOEM ensures hat offshore wind is constructed in an environmentally responsible manner. The network began as a collection of businesses who advocated for the passage of the original offshore wind bill, the Maryland Offshore Wind Energy Act of 2013. We were high hopes the offshore wind had the potential to transform Baltimore Harbor into a center of manufacturing and logistics. Now, ten years later, we're seeing that dream become a reality, but only as long as this project continues moving forward. US Wind has already secured an offtake agreement based on legislative intent with the State of Maryland to provide just about 1.1 gigawatts of clean, renewable energy to over 300,000 households in Maryland. The project will contribute significantly to the states and the nation's renewable energy goals. |
| BOEM-2022-0025-TRANS-2-3 | Russell Kovach | Individual | None | General Support or Opposition | And so I'm very invested in supporting the wind energy plans off the coast of Maryland, and I do so because I know that they will benefit not only the economy, as has been attested today, but will also benefit the natural world that is really the economic backbone of the county when you think about it. |
| BOEM-2022-0025-TRANS-23-81 | Natasha Finnegan | Individual | None | General Support or Opposition | Please go forward on this project with us wind. |
| BOEM-2022-0025-TRANS-25-89 | Larry Ryan | Non-governmental organization | Delaware Chapter of the Evangelical Lutheran Church in America Creation Care | General Support or Opposition | Therefore, the Creation Care Ministry supports accelerating the rate at which renewables are brought into the energy market to scale new clean generation capacity, especially offshore wind. We support recruiting state finance, capital expenditure and procurement to meet a net zero emissions standard. The public investment will benefit everyone in every part of the commons and public good. |
| BOEM-2022-0025-TRANS-2-6 | Russell Kovach | Individual | None | General Support or Opposition | The development of wind energy off the coast of Maryland is going to improve both the health of the people living in our state and it will improve the conditions along the coast, which, again, are by far is by far the biggest draw to people. I know that some will likely be thinking that windmills might kill birds, and of course you're correct, but it's surprisingly rare in offshore wind farms. I've been reading that most seabirds moving offshore, they fly very low to the water. These Haley Aid turbines that we were talking about, they're structured such that the blades are over 100ft above the water, meaning very few seabirds would ever be struck by offshore windmills. Migrating land birds pass rains tend to fly many thousands of feet over the ocean, so way above the blades. |
| BOEM-2022-0025-TRANS-26-92 | Peggy Schultz | Non-governmental organization | Power People for Offshore Wind Energy Resources | General Support or Opposition | I'm speaking today on behalf of Power People for Offshore Wind Energy Resources, a coalition of organizations that support an offshore wind project for Delaware. |
| BOEM-2022-0025-TRANS-27-100 | Terry Sterner | Individual | None | General Support or Opposition | In conclusion, after you exhaust your assessment of the proposed wind farm projects, please move quickly to green light them, because it's all of our collective interests to do so. |
| BOEM-2022-0025-TRANS-27-98 | Terry Sterner | Individual | None | General Support or Opposition | But rest assured that the overwhelming majority of area citizens are fully in favor of the promise that wind power holds for all of us, and especially the environment. To wit, when the power produced is virtually carbon emission free, beyond their actual construction and beyond maintenance costs, it becomes cost effective and totally free once the system has paid for its own creation and support system. Because the wind blows anyway, why not take advantage of it? |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-TRANS-28-102 | Gerald Ehrenstein | Non-governmental organization | Montgomery County Faith Alliance for Climate Solutions | General Support or Opposition | And we also group support very much this project. I'm a member of a group called Mcfax Montgomery County Faith Alliance for Climate Solutions. This is a group of more than 50 congregations of various denominations who recognize that the problem about the greenhouse gas causing the climate change, that this problem is not only a problem for the economics of our society, but it's also a problem for the morality of it. |
| BOEM-2022-0025-TRANS-29-104 | Reba Carruth | Individual | None | General Support or Opposition | And I just wanted to say tonight that I think that this project with wind technology and wind energy is very positive and it's very needed for the state of Maryland. And I would like to publicly voice my support for this. |
| BOEM-2022-0025-TRANS-3-10 | Susan Dent | Individual | None | General Support or Opposition | I'm actually a proponent of offshore wind, but I just kind of want to make sure that we have a complete assessment project to make sure that our first venture into offshore wind in the area does not lead to negative, I guess, feelings or negative input. Several then subsequently drum up proponents or angst against future offshore wing projects. |
| BOEM-2022-0025-TRANS-31-112 | Coralie Pryde | Individual | None | General Support or Opposition | I am not concerned about what this will do negative to the life of the Atlantic, and I'm very pleased to see that we are starting to go ahead and getting these wind farms in. |
| BOEM-2022-0025-TRANS-35-118 | Kathy Phillips | Individual | None | General Support or Opposition | So please do not allow this current process to be delayed further. So please do not allow this current process to be delayed further. |
| BOEM-2022-0025-TRANS-36-131 | Dave Arndt | Individual | None | General Support or Opposition | What I please ask you to do is approve this wind farm as quickly as possible. We needed as quickly as possible to save our Eastern Shore and to save our environment. |
| BOEM-2022-0025-TRANS-37-134 | Jenn Aiosa | Local agency | Baltimore County Executive | General Support or Opposition | As a consistent supporter of Maryland's offshore wind, Baltimore county urges the Bureau of Ocean Energy Management to continue to work with US Wind to implement the proposed plans for our first one of our first offshore wind installations. |
| BOEM-2022-0025-TRANS-39-138 | David Goodrich | Non-governmental organization | Board of the Chesapeake Climate Action Network | General Support or Opposition | I'm a retired climate scientist from NOAA, and currently I also co chair the board of the Chesapeake Climate Action Network. The Intergovernmental Panel on Climate Change says that we have to reduce fossil fuel emissions by half by 2030 and to be shut them off entirely by 2050. We need this energy. I've been on the bridge in 20 foot seas, keeping putting the nose of my ship into some of these waves. And secondly, whatever relatively minimal environmental impacts of turbines pails next to the methane gas flaring that you see in the Permian Basin of Texas, or the massive oil soaked tailings ponds at the tar sands in Alberta, make no mistake, we are making a choice between energy coming from those places, from the tar stands, from the Permian Basin, and clean energy. What I would urge BOEM in this process to do is to show the world that the US can still do big stuff and create a clean energy project of the scale that we need. |
| BOEM-2022-0025-TRANS-40-142 | Bill Berry | Individual | None | General Support or Opposition | I'm supporting this project wholeheartedly. I think we need to go to wind turbines offshore to provide the clean energy the state and the country needs. |
| BOEM-2022-0025-TRANS-41-172 | Eric Mason | Individual | None | General Support or Opposition | I just wanted to say I'm very happy to see this project finally coming online, coming into reality. |
| BOEM-2022-0025-TRANS-4-13 | Roselie Bright | Individual | None | General Support or Opposition | I'm speaking as just a private citizen and I support the windmill project and I support the windmill project. |
| BOEM-2022-0025-TRANS-42-174 | William Steigelmann | Non-governmental organization | Environmental Trust, Salisbury | General Support or Opposition | I want to urge actions needed to get offshore wind projects located along the Atlantic coast of several states, but especially along the shores of Maryland and Delaware into operation as quickly as possible. |
| BOEM-2022-0025-TRANS-43-145 | Christopher Smitley | Non-governmental organization | IBEW Local union 126 | General Support or Opposition | We would just really love to see this go through. |
| BOEM-2022-0025-TRANS-43-176 | Janice Proctor | Individual | None | General Support or Opposition | And I would like to continue to see more of green energy efforts going forward, things like solar and the wind power that you're doing and whatever new technology is being worked on. |
| BOEM-2022-0025-TRANS-45-151 | Jerry Mclaurin | Local agency | PFC Black Chamber of Commerce | General Support or Opposition | We don't know anything about the win opportunity, but after we heard US Wind tell us about that, we are on board supporting US when to get those permits for this offshore wind. |
| BOEM-2022-0025-TRANS-46-153 | Bronwyn Betz | Individual | None | General Support or Opposition | I just wanted to state that I support the project that US Wind is trying to install offshore. |
| BOEM-2022-0025-TRANS-47-157 | Brian Gilliland | Individual | None | General Support or Opposition | They are a symbol of the country moving forward, of becoming safer, less dependent on foreign energy, and an industry that can and will move forward as time progresses. I would like very much to see this project and others like it continue to crop up, up and down the East Coast. |
| BOEM-2022-0025-TRANS-48-158 | Surajit Sengupta | Non-governmental organization | Intact Workforce | General Support or Opposition | I am actually in full support of this US Wind project to basically build the offshore wind project off the coast of Ocean City. |
| BOEM-2022-0025-TRANS-49-162 | David Lawson | Non-governmental organization | University of Delaware | General Support or Opposition | So I'd like just to voice, my support for this project, for us, Win, for Orstead and all the others environmentally managed. |
| BOEM-2022-0025-TRANS-50-163 | Claire Simmers | Individual | None | General Support or Opposition | Demand is only increasing. We need to look to solar, wind, water, to naturally occurring forces to meet our demand to provide our supply. So today we're discussing a process that is concerned with the beginnings and the endings of the project, with concern about the how to protect and how to limit negative impacts. We are asking how we can increase electricity generation with care and with respect. |
| BOEM-2022-0025-TRANS-51-164 | Richard Meehan | Local agency | Ocean City, Maryland | General Support or Opposition | To be clear and consistent, I will reiterate again that the town of Ocean City supports clean energy and the promised investment by US Wind in the state of Maryland and the jobs this industry will create. |
| BOEM-2022-0025-TRANS-5-15 | Jim Strong | Non-governmental organization | United Steel Workders International Union | General Support or Opposition | First, let me thank them for the opportunity to speak in support of US winds cop. I'm a member and I'm an employee of United Steel Workers International Union. I first went on staff in 1998 2001 I was promoted to the position of the Maryland Sub-District Director. 2017, I was then the Assistant Director. And March of this year, I was appointed to the position of the offshore wind sector Assistant by our international President, Tom Conway, with the specifics to work with US. When I'm a lifelong residence of Maryland, I grew up in Baltimore City, and I can remember that there is always an abundance of good paying, family sustaining union jobs which created the middle class. During that period of time, our union represented over 50,000 members in the state of Maryland, with about 30,000 of them working at Buffalo Steel at Spares Point. Our union has a tremendous history there as we represent those workers for over 70 years. The plant closed in 2012, leaving around 2300 members devastated, along with their families and the communities. |
| BOEM-2022-0025-TRANS-5-18 | Jim Strong | Non-governmental organization | United Steel Workders International Union | General Support or Opposition | For these reasons, I would urge BOEM to approve US Wind construction operation plans as soon as possible. |
| BOEM-2022-0025-TRANS-52-171 | Colbert Daniels | Individual | None | General Support or Opposition | I just wanted to say like someone else earlier, I really appreciate all the things you all doing right now because I think this is very important and imperative that we take action as far as approving not only the air and pollution and just moving more to natural and renewable energy, not just in state of Maryland, but hopefully it will lead to other projects across the United States and hopefully the world. |
| BOEM-2022-0025-TRANS-55-181 | Dr. Ted Spickler | Individual | Climate Reality Project | General Support or Opposition | And I think that you're going to have a surprise at the number of people who want to get on site seeing boats and travel out there and see these wonderful turbines. It's space age. It's new stuff. It's high tech. So all of that to me, is a very strong positive. |
| BOEM-2022-0025-TRANS-56-184 | Kendrick Faison | Non-governmental organization | SpatialGIS | General Support or Opposition | We're one of very few African American owned geospatial companies in the country. And so we've seen a great bit of opportunities for us from a business perspective. But we're truly here to say that we're in full support of the US Wins project to build an offshore project off the shore of Ocean City, Maryland, to build also a manufacturing facility on the Trade Point Atlantic and Baltimore County to ensure that we have Marylanders that are also working at this junction. |

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| BOEM-2022-0025-TRANS-56-186 | Kendrick Faison | Non-governmental organization | SpatialGIS | General Support or Opposition | Thus, our organization is in full support of the Bureau of Energy and Management and approving the US Wind contract and operational plan and letting this project move forward to provide renewable energy to the citizens of Maryland. But more than I can say, that is to ensure that we have the opportunity for many minority firms to be a part of this conversation, that we will be able to take this opportunity to go on across this country, to be able to support this type of development across the country as we've seen. So I want to just say thank you for the opportunity for us to speak, but truly, given our full support in regards to what's next, this is the next generation of technology, innovation and tradecraft the state of Maryland most definitely needs to start investing in. the US Wind contract and operational plan and letting this project move forward to provide renewable energy to the citizens of Maryland. |
| BOEM-2022-0025-TRANS-60-198 | Venkat Subramanian | Individual | None | General Support or Opposition | I definitely feel there are significant advantages to the renewable energy, particularly given the global situation and the dependency on oil and gas.<br>And definitely wind energy is a very positive and a blessing indeed. I also see this as a good economic engine for the area and the community. |
| BOEM-2022-0025-TRANS-6-19 | Nick Caruso | Non-governmental organization | International Brotherhood of Electrical Workers | General Support or Opposition | So these wind projects are a big deal to us here on the shore, especially electrician, and it will be short and quick. I just want to put out there we support US Wind and getting this done. |
| BOEM-2022-0025-TRANS-7-20 | Jill Gaumer | Individual | None | General Support or Opposition | I want to speak in support of US Wind and I want to speak to the issue of the view shed. |
| BOEM-2022-0025-TRANS-8-25 | Walter Weiss | Non-governmental organization | Montgomery County Faith Alliance for Climate Solutions | General Support or Opposition | We are very much in favor of offshore wind for Maryland. We really need this wind power as soon as possible carbon emissions continue to go up. We live in one of the areas where there's most coal fired power in our electric grid, and we really need to get clean electricity into our grid. I see the timeline on the environmental impact statement of 24 months, and I know there's a lot of work to do but if at all possible, I would urge you to finish earlier than that. And I don't know whether it's possible to accelerate that, but it is shocking to me to see that it's been over a decade that this project has been planned and worked on. |
| BOEM-2022-0025-TRANS-9-27 | Charles Stegman | Non-governmental organization | Wacomico Environmental Trust | General Support or Opposition | And getting these wind turbines online as soon as possible will help us save lives as well as save the climate. |
| BOEM-2022-0025-DRAFT-0011-223 | Edward Larkey | Individual | None | General Wildlife | I also think that steps must be taken to ensure that oceanic wildlife is not negatively affected by the foundations of the wind generators, or any other underwater or above water facilities connected with this project. |
| BOEM-2022-0025-DRAFT-0020-241 | Elizabeth Reineck | Individual | None | General Wildlife | In addition to the devastating impact to the economy of Ocean City, building wind turbines also will negatively impact the environment. There is significant bird migration through the proposed “wind farm” zone. Nearby Assateague is home to over 300 bird species, including eagles, falcons, and herons. Wind turbines kill many thousands of birds. Reports from California indicate 20% reduction in their endangered bird population. There is also a significant horseshoe crab in the Delaware Bay, which will be at risk by drilling large holes into the ocean floor. I urge you abandon plans to pollute our beautiful Maryland coastline with these massive industrial structures and seek more sustainable and cost-effective sources of energy. |
| BOEM-2022-0025-DRAFT-0021-242 | Eric Ludwig | Individual | None | General Wildlife | This wind project is short sighted in so many ways it is unbelievable. If these windmills are so great, why aren't they being erected 3.01 miles off the beach where they will have less impact on migrating fish and fish habitat? They would be cheaper to maintain, cost less to construct, and have a short run to the power grid. It has already been identified that windmills kill birds and now the plan is to put these in areas where we have vulnerable bird populations and endangered mammals<br>On top of that there is something morally wrong with placing windmills in the last wilderness on the east coast. We protect Alaska when fewer people are able to see that wilderness than the number of people that look at the Atlantic Ocean for its wild vastness.<br>The loss to the recreational anglers during these builds could be enormous as any work on the seafloor disturbs fish populations and this proposal is going to place the windmills in the main fishing areas for most recreational anglers on Delmarva. I truly hope that in the future this isn't looked back upon as a major tragedy to temporarily fix an energy issue. |
| BOEM-2022-0025-DRAFT-0031-270 | Michael Papa | Individual | None | General Wildlife | I oppose based on the migration of the endangered right whales, navigational issues, sound wave impact on marine life both during construction and operation of the turbines, the location of the Atlantic Flyway directly impacted by the leases, as well as constant blinking lights over the ocean vista, cable onshoring, the critical concern for the health of the horseshoe crab. The unobstructed viewshed IS a natural resource. |
| BOEM-2022-0025-DRAFT-0037-277 | Jon Murray | Individual | None | General Wildlife | We are opposed to the proposed location of the wind farm off the coast of Delaware, and the cables coming in via 3R’s road, as it will harm the important Indian River inlet ecosystem, endangering our horseshoe crab and loggerhead turtle population! |
| BOEM-2022-0025-DRAFT-0038-278 | Timothy Leahy | Individual | None | General Wildlife | I am writing to oppose the location of the US wind Offshore Maryland Facility. It will have a negative impact on Migratory birds , especially loons. The fishery impacts are not well documented, especially the impact of vibrations on local and migratory species. These impacts may be inherent to any offshore project, but the farther from shore that the project is located, the lower the impact. |
| BOEM-2022-0025-DRAFT-0039-280 | Lizbeth Lear | Individual | None | General Wildlife | I am against BOEM allowing wind turbines to be installed off the coast of Fenwick Island, DE. They will destroy our beautiful coastal and marine environment.<br>The turbine construction will diminish commercial fishing, interfere with navigational radar, and cause pre-agreed upon electric rates to soar. Jobs for this project will go to Europeans - not Delaware citizens. Marine environment will be destroyed. Whales, porpoises, and other marine mammals will have their habitats disrupted by construction and intolerable noise. This noise will also be heard by the residents of our coastal town --- a town whose motto is "the quiet resort".<br>It will destroy the horseshoe crab preserve, which is so vital to medical research. The turbines lease area is in the migratory bird pathway - which will result in bird kills of unknown proportions. |
| BOEM-2022-0025-DRAFT-0046-296 | Victoria Venable | Non-governmental organization | Chesapeake Climate Action Network | General Wildlife | The wind farm will benefit marine organisms and will significantly increase their abundance. Most fish species are not deterred during the time of construction and are found in higher abundances during operation than before construction began. Marine mammals like whales and dolphins will likely leave the area during construction.28 However, marine mammals have been documented returning to the area following construction in similar or higher abundances than before construction, meaning creating a wind farm off of the coast will provide an overall benefit to marine organisms.29 Additionally, following construction and after the ocean floor has settled, shellfish will attach themselves to the underwater turbine base and grow across the surface, creating an artificial reef.3031 Each turbine may attract approximately four metric tons of shellfish to the area.32 This influx of novel organisms into the area would benefit the overall health of the ecosystem and accommodate other marine wildlife and fisheries. Specifically, predatory marine mammals would prosper in the area due to increased prey and increased food availability from the wind turbines. |
| BOEM-2022-0025-DRAFT-0047-303 | Rose Mary Hoy | Individual | None | General Wildlife | The marine environment will be destroyed due to habitat disruption impacting whales, porpoises, horseshoe crabs (which are vital to medical research). |
| BOEM-2022-0025-DRAFT-0052-316 | Megan Staczek | Individual | None | General Wildlife | The marine environment will be destroyed due to habitat disruption impacting whales, porpoises, horseshoe crabs (which are vital to medical research). |
| BOEM-2022-0025-DRAFT-0053-322 | Angela Silverman | Individual | None | General Wildlife | Vital studies for the protection of endangered marine and bird species, including the Right Whale, horseshoe crabs, and migratory birds, were never conducted or completed. Tower Shores is one of the prime mating grounds for the endangered horseshoe crabs. How will the drilling and vibrations from the turbines impact marine and bird life? Fenwick Island was able to prevent the cables from being brought ashore there because of the impact on its wetlands. The impact on Delaware’s marine and bird life must be studied. |
| BOEM-2022-0025-DRAFT-0058-328 | albert sweeney | Individual | None | General Wildlife | I oppose the US Wind farm for the following reasons: 1.) Proposed land fall at 3Rs beach takes the lines through the critical breeding grounds of horse shoe crabs and terrapins. There is NO environmental studies of the long term effect on the marine populations. |
| BOEM-2022-0025-DRAFT-0062-336 | TJ Zak | Individual | None | General Wildlife | As an owner in the community of Breakwater Beach, Bethany Beach, DE (29347 Kelly Ln), I want to make an official comment against the proposed Maryland wind farm . Proposed cables and substation are to come ashore at 3R's beach (Delaware State Park) or through Towers Road Beach. In addition, the windfarms will be visible off our beach. Wind energy can have adverse environmental impacts, including the potential to reduce, fragment, or degrade habitat for wildlife, fish, and plants. In addition, spinning turbine blades can pose a threat to flying wildlife. People who live in close proximity to wind farms have experienced decreased quality of life, annoyance, stress, sleep disturbance, headaches, anxiety, depression, and cognitive dysfunction. We live in a great community and want to keep it that way. The addition of the proposed wind farm will hurt our community and the nature surrounding it in a profound way. |

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| BOEM-2022-0025-DRAFT-0063-337 | Erin Carver | Individual | None | General Wildlife | My family and I firmly object to permitting the US wind farm to reach landfall in 3Rs beach. This is pristine, fragile wetlands that support horseshoe and terrapin breeding. Many migrating and endangered species of birds are dependent on horseshoe crab eggs to survive. There are many locations in Maryland that could be utilized - both 230 KV and 130KV. There is no long term impact study on either the horseshoe crab or terrapin deleterious effects. We are also against the effect on marine mammals from driving the support stations and laying the connecting cables. We also oppose the noise and disruption that would occur from construction at Sussex County locations. This is a Maryland project and should be limited to landfall in Maryland. We are for renewable energy but only when it is done right. |
| BOEM-2022-0025-DRAFT-0064-338 | Brendan Sweeney | Individual | None | General Wildlife | Our family opposes granting a permit for US wind farm landfall in Sussex county 3RS beach. This the breeding area for terrapins and horseshoe crabs . Both species are declining in numbers and the crab eggs are essential food for endangered species ( eg. red knot) and the crab blood is a major component in medical treatments and research. Migrating birds and other animals are dependent to the crab eggs for survival. We are also concerned about the disruption caused by placing the windmills foundation and cable laying on marine animals. There are many Maryland locations that do not traverse so much ocean and are much closer to the US Wind project. We are also concerned to the visual distortion of the windmills. The original proposal told to us was that they would not be seen from shore. The affect on tourism and the peaceful enjoyment and view we have had for many years would be altered. |
| BOEM-2022-0025-DRAFT-0069-353 | Vicki Carmean | Local agency | Fenwick Island | General Wildlife | But more important is what it will do to the marine environment. How can a this so-called environmental fix to replace fossil fuels be allowed to destroy another irreplaceable ecosystem? The off shore sites for these wind turbines overlap the migratory pathways for many birds, monarch butterflies, rich fishing grounds and marine mammals, thus creating a negative environment for these creatures with location, construction, and sound pollution. The horseshoe crab's sensitive breeding grounds will also be negatively affected, thus hindering future medical research. In addition, repairs to these wind turbines will be expensive and difficult in corrosive ocean waters, and the end product will be extremely expensive electricity that taxpayers will ultlimately subsidize forever. Please, please under the guise of protecting the earth with green energy do not destroy our coastal environment. Do not create a waste land for future generations. The research does not support constructing these wind farms as a way to make the future better. As per documentation, I am sure you have already been sent the documents that support the points I have made above. |
| BOEM-2022-0025-DRAFT-0073-361 | Jodi Rose, Albert Todd | Non-governmental organization | Interfaith Partners for the Chesapeake | General Wildlife | We believe the applicants have diligently worked to address migratory shorebirds, horseshoe crab nesting habitats and Right Whale navigation in the open sea lanes. In fact, one applicant’s research provided to the University of Maryland Center for Environmental Science (UMCES) will greatly expand knowledge on whale navigation and migration, improving the ability to better address and mitigate any sound impacts from future turbines. |
| BOEM-2022-0025-DRAFT-0086-397 | Suzanne Battista | Individual | None | General Wildlife | My concerns are:<br>· The marine environment will be destroyed due to habitat disruption impacting whales, porpoises, horseshoe crabs (which are vital to medical research).<br>· The impact on migratory bird pathways will result in bird kills of unknown proportions. |
| BOEM-2022-0025-DRAFT-0089-409 | Pat & Miles Weigold | Individual | None | General Wildlife | 3.BOEM should reject or defer the US Wind proposal until all studies are completed for the protection of marine and bird life, including whales, horseshoe crabs and migratory birds. Wind’s own proposal acknowledges that they have not completed vital studies on the potential impacts of the project on several species including the horseshoe crab. The project is proposed to be built directly on top of the Carl N. Shuster, Jr. Horseshoe Crab Sanctuary. The blood from these creatures is harvested annually by pharmaceutical companies as it is the only material suitable for finding antigens in vaccines. Likewise, US Wind admits that bird kills, including of the endangered Red Knot, occur from the wind turbines (each of which sweeps an area the size 10 football fields with blade tip speeds up to 180 mph), but it does not provide meaningful data on bird kills. Lastly, US Wind acknowledges sightings of the critically endangered North Atlantic Right Whale and other endangered species in the lease area. BOEM should require US Wind to measure the underwater sound levels of the proposed turbines and adopt a mitigation strategy to protect the Right Whales and other endangered species. BOEM should require US Wind to complete all studies needed to ensure the protection of marine and bird species before issuing a draft EIS. |
| BOEM-2022-0025-DRAFT-0092-413 | Stephen Schmidt | Individual | None | General Wildlife | BOEM should reject or defer the US Wind proposal until all studies are completed for the protection of marine and bird life, including whales, horseshoe crabs and migratory birds. US Wind’s own proposal acknowledges that they have not completed vital studies on the potential impacts of the project on several species including the horseshoe crab. The project is proposed to be built directly on top of the Carl N. Shuster, Jr. Horseshoe Crab Sanctuary. The blood from these creatures is harvested annually by pharmaceutical companies as it is the only material suitable for finding antigens in vaccines. Likewise, US Wind admits that bird kills, including of the endangered Red Knot, occur from the wind turbines (each of which sweeps an area the size 10 football fields with blade tip speeds up to 180 mph), but it does not provide meaningful data on bird kills. Lastly, US Wind acknowledges sightings of the critically endangered North Atlantic Right Whale and other endangered species in the lease area. BOEM should require US Wind to measure the underwater sound levels of the proposed turbines and adopt a mitigation strategy to protect the Right Whales and other endangered species. BOEM should require US Wind to complete all studies needed to ensure the protection of marine and bird species before issuing a draft EIS. |
| BOEM-2022-0025-DRAFT-0106-457 | Dennis OBrien | Individual | None | General Wildlife | BOEM should require US<br>Wind to complete all studies needed to ensure the protection of marine and bird species<br>before issuing a draft EIS. |
| BOEM-2022-0025-DRAFT-0110-470 | John Neylan | Individual | None | General Wildlife | The potential impact that these wind farms may on such a variety of marine and wildlife must be studied in great detail, and publicly vetted, before any approval is considered. |
| BOEM-2022-0025-DRAFT-0131-533 | Stefani Culver | Individual | None | General Wildlife | I am very concerned about our environment. We definitely need better ways to produce power! I believe we should be looking at GOOD alternative. BUT NOT rushing into anything without considering the consequences. Vital studies for the protection of endangered marine and bird species, including the Right Whale, horseshoe crabs, and migratory birds, were never conducted or completed. This is of vital importance and unconscionable that it has not been concluded. |
| BOEM-2022-0025-DRAFT-0131-534 | Stefani Culver | Individual | None | General Wildlife | Tower Shores , where I am a resident , is one of the prime mating grounds for the endangered horseshoe crabs. How will the drilling and vibrations from the turbines impact marine and bird life. The studies MUST be done. |
| BOEM-2022-0025-DRAFT-0135-550 | John Hynes | Individual | None | General Wildlife | Further studies need to be done to make sure migratory birds, whales and horseshoe crabs are not affected by the turbines, noise in the water and cables that will be laid. Look at what has happened to the cables for the Block Island (RI) wind farm which consist of just 5 turbines. Offshore wind turbines are a very expensive way to produce energy and not without numerous troubling issues. Please do not approve this proposal without an extensive investigation. |
| BOEM-2022-0025-DRAFT-0143-575 | Linda Sweeney | Individual | None | General Wildlife | The Skipjack and US Wind projects lease areas sit atop the Carl N. Shuster Jr. Horseshoe Crab Sanctuary. Areas of steel, concrete and rock will be added to the sandy seabed for scour protection, power cables will have electromagnetic fields, and construction and operational noise may exceed federal standards that protect sea life, and there are no studies of these important issues. There are also no studies of the effect on the critically important horseshoe crabs that are necessary for medical products and support of threatened avian and marine animals. There are also no studies on the effect of the spacing of the towers, the attendant noise, and disruption of the seabed on the endangered right whales that are seen in the lease areas. |
| BOEM-2022-0025-DRAFT-0146-583 | Elizabeth Frazee | Non-governmental organization | Tower Shores Beach Association Board of Directors | General Wildlife | BOEM should reject or defer the US Wind proposal until all studies are completed for the protection of marine and bird life, including whales, horseshoe crabs and migratory birds. BOEM should require US Wind to complete all studies needed to ensure the protection of marine and bird species before issuing a draft EIS. |
| BOEM-2022-0025-DRAFT-0148-591 | J. Marcus | Individual | None | General Wildlife | We are concerned about the potential human health and environmental consequences of this project off the North Bethany Beach, DE coast. Possible effects on Horseshoe Crabs, marine wildlife and birds as well as shoreline erosion (with rising sea levels) need to be considered. |
| BOEM-2022-0025-DRAFT-0150-597 | James Hahn | Individual | None | General Wildlife | I feel like us wind should not be given the approval to for impact studies. You us wind on numerous occasions has been caught in straight up lies about where and when they would be doing survey work. They have been caught surveying with peso on board survey vessels. How can we trust us wind when they have been caught in so many lies. Before any survey work or impact studies are done us wind should made to study the effects of survey work. They have killed the bottom off ocean city Maryland. This area is out historical fishing grounds. This is supposed to be. Clean green energy, if I destroyed the ocean the way us wind has I would be in jail. Everytime us wind gets caught doing something wrong it get swept under the rug. How can you run a import cable thru the highly protected area of Delaware. For years the environmentalist have been trying to stop commercial fishing in the area because of the coral. Now us wind wants to run cable thru the coral bottom. I feel like before anymore work is done we need a 3rd party to do some studies. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0151-598 | Mary Jo Slowey | Individual | None | General Wildlife | I am a Bethany Beach resident and I am opposed to the current proposal for offshore wind energy. I believe this needs more study. I am in no way concerned about the impact this will have on my view. I am concerned about the impact it will have on migratory birds and butterflies and on the habitat of the hotshot crab and whale populations. |
| BOEM-2022-0025-DRAFT-0163-631 | Steve Plotkin | Non-governmental organization | Ocean Hamlet Homeowners Association | General Wildlife | BOEM should reject or defer the US Wind proposal until all studies are completed for the protection of marine and bird life, including whales, horseshoe crabs and migratory birds. US Wind's own proposal acknowledges that they have not completed vital studies on the potential impacts of the project on several species including the horseshoe crab. The project is proposed to be built directly on top of the Carl N. Shuster, Jr. Horseshoe Crab Sanctuary. US Wind admits that bird kills, including of the endangered Red Knot, occur from the wind turbines but it does not provide meaningful data on bird kills. Lastly, US Wind acknowledges sightings of the critically endangered North Atlantic Right Whale and other endangered species in the lease area. BOEM should require US Wind to measure the underwater sound levels of the proposed turbines and adopt a mitigation strategy to protect the Right Whales and other endangered species. |
| BOEM-2022-0025-DRAFT-0164-634 | Steve Plotkin | Individual | None | General Wildlife | BOEM should reject or defer the US Wind proposal until all studies are completed for the protection of marine and bird life, including whales, horseshoe crabs and migratory birds. US Wind's own proposal acknowledges that they have not completed vital studies on the potential impacts of the project on several species including the horseshoe crab. The project is proposed to be built directly on top of the Carl N. Shuster, Jr. Horseshoe Crab Sanctuary. US Wind admits that bird kills, including of the endangered Red Knot, occur from the wind turbines but it does not provide meaningful data on bird kills. Lastly, US Wind acknowledges sightings of the critically endangered North Atlantic Right Whale and other endangered species in the lease area. BOEM should require US Wind to measure the underwater sound levels of the proposed turbines and adopt a mitigation strategy to protect the Right Whales and other endangered species. |
| BOEM-2022-0025-DRAFT-0182-694 | William Truitt | Non-governmental organization | Cotton Patch Hills Association, Inc. | General Wildlife | US WIND'S COP FAILS TO PRESENT AND ADEQUATELY CONSIDER POTENTIAL IMPACTS ON THREATENED AND OTHER IMPORTANT ANIMAL SPECIES AND MUST BE WITHDRAWN UNTIL SUFFICIENT PEER-REVIEWED FIELD STUDIES HAVE BEEN PERFORMED. |
| BOEM-2022-0025-DRAFT-0192-727 | David Dempsey | Individual | None | General Wildlife | Impact to Wildlife. The BOEM must also evaluate whether and how the location of this project will impact wildlife. |
| BOEM-2022-0025-DRAFT-0194-731 | Anonymous Anonymous 18 | Non-governmental organization | Marine Education, Research & Rehabilitation Institute, Inc. | General Wildlife | As defenders of marine life and ocean habitat, the MERR Institute views offshore wind farms as a detrimental choice for fossil fuel alternatives. The adverse impacts on wildlife are substantive. The Delaware Bay and coastline afford vital habitat for migrating whales, shorebirds, and butterflies as well as providing foraging grounds for sea turtles, birthing and feeding grounds for bottlenose and other dolphin species, and winter habitat for seals. The installation of offshore wind farms, accompanied by high voltage cables under the ocean floor create an industrial fragmentation of the marine ecosystem, the effects of which will include but are not limited to, increased underwater noise pollution, obstacles to migration routes, displacement, loss of prey, separation of calves from their mother, radiation, and interference with the earth's naturally occurring electromagnetic fields. In conclusion, we urge decision makers not to rush towards an alternative energy system that has not been adequately researched for long-term impacts, and in the short term is proven to be detrimental to many species of wildlife, ecosystems, and communities. There are other existing, less detrimental forms of sustainable energy and systems, such as solar, geo-thermal, green hydrogen, and net-zero housing designs that we feel are a more prudent choice to meet the energy needs of this country and others. At the very least, we recommend that consideration be given to locating the turbines further off the coast so that they would be outside of the established migratory pathways of large whale species, and less likely to interfere with mother/calf pairs, or with feeding and foraging areas for dolphins, seals and sea turtles. |
| BOEM-2022-0025-DRAFT-0198-739 | Thomas Shipman | Individual | None | General Wildlife | The project area lies within critical habitat for horseshoe crabs, overlaying the Dr. Carl N. Shuster, Jr. Horseshoe Crab Reserve . Horseshoe crab eggs are a critical food source for migrating shore birds, including the endangered Red Knot. Delaware Bay's Horseshoe Crab population has declined by 90% over the last 15 years, mostly due to overharvesting and habitat degradation. As the number of Horseshoe Crabs have decreased, so have the number of eggs available for consumption by migrating shorebirds. Shorebird population numbers are therefore plummeting as well, as many cannot gain the amount of energy needed to complete their migrations . Horseshoe crab blood is sustainably harvested and is a crucial biomedical input in vaccine development, including the COVID-19 vaccine . of vaccines, The EIS should fully evaluate the impact of the construction and operation of the project on horseshoe crabs, the migratory birds that rely on them. |
| BOEM-2022-0025-DRAFT-0198-740 | Thomas Shipman | Individual | None | General Wildlife | The EIS should evaluate the impact on loggerhead turtles, whose range includes the proposed project area .<br>The construction and existence of 126 structures creates unknown risks to numerous birds, including migratory shorebirds, waterfowl, ospreys and bald eagles who forage in the project area. Marine mammals, including the North Atlantic Right Whale, bottlenose dolphins, pilot whales, fin whales, humpback whales, sperm whales, sei whales, and fin whales, all transit the Atlantic coast and could be harmed by these structures . The EIS should fully evaluate the impacts on these species.<br>The impact of bottom disturbance, including water turbidity on fish and marine mammals should also be examined in the EIS.<br>The EIS should fully examine the impact on avian, marine mammal, fish and insect species should a catastrophic failure of one or more turbines occur for any reason, including hurricanes. |
| BOEM-2022-0025-DRAFT-0199-749 | Susan Brennan | Individual | None | General Wildlife | 9. I am concerned for the marine life, the commercial fishing industry, the location of these leases in the Atlantic Flyway, the migrating monarch butterflies and migration area of many marine animal including the Right Whale. I am concerned about an imbalance that would adversely affect the highly valued horseshoe crab. |
| BOEM-2022-0025-DRAFT-0201-754 | Sara Miles | Individual | None | General Wildlife | 3.BOEM should reject or defer the US Wind proposal until all studies are completed for the protection of marine and bird life, including whales, horseshoe crabs and migratory birds. US Wind's own proposal acknowledges that they have not completed vital studies on the potential impacts of the project on several species including the horseshoe crab. The project is proposed to be built directly on top of the Carl N. Shuster, Jr. Horseshoe Crab Sanctuary. The blood from these creatures is harvested annually by pharmaceutical companies as it is the only material suitable for finding antigens in vaccines. Likewise, US Wind admits that bird kills, including of the endangered Red Knot, occur from the wind turbines (each of which sweeps an area the size 10 football fields with blade tip speeds up to 180 mph), but it does not provide meaningful data on bird kills. Lastly, US Wind acknowledges sightings of the critically endangered North Atlantic Right Whale and other endangered species in the lease area. BOEM should require US Wind to measure the underwater sound levels of the proposed turbines and adopt a mitigation strategy to protect the Right Whales and other endangered species. BOEM should require US Wind to complete all studies needed to ensure the protection of marine and bird species before issuing a draft EIS. |
| BOEM-2022-0025-DRAFT-0202-755 | Thomas Brennan | Individual | None | General Wildlife | I am concerned about the many aquatic species in the ocean and the disturbance to their habitat/eco-systems/migration territories because of the construction and operation of these exceptionally large turbines and substations. Most specifically the whales and horseshoe crabs. |
| BOEM-2022-0025-DRAFT-0203-761 | Diane Rosenberg | Individual | None | General Wildlife | Studies must be done to confirm the windmills will not effect wildlife. Stiudies must be done to confirm safety to all in the bay. |
| BOEM-2022-0025-DRAFT-0204-765 | Stephani Ballard Wagner | Individual | None | General Wildlife | THE PROJECT WILL HAVE ADVERSE EFFECTS AND UNKNOWN, POTENTIALLY ADVERSE, EFFECTS ON BIOLOGICAL RESOURCES.<br>• Expected adverse effects from shoreline and deeper sea drilling and construction, and the resulting unnatural structures becoming permanently affixed to the sea floor, can be expected to affect sea mammals, sea turtles, fish, crabs, smaller sea life and aquatic plants. The risk posed to birds from the turbines is especially troubling as the Lease Area encompasses or is in close proximity to migratory routes up and down the Atlantic.<br>• US Wind's own proposal acknowledges that they have not completed vital studies on the potential impacts of the project on several species including the horseshoe crab. The project is proposed to be built directly on top of the Carl N. Shuster, Jr. Horseshoe Crab Sanctuary. The blood from these creatures is harvested annually by pharmaceutical companies as it is the only material suitable for finding antigens in vaccines. |
| BOEM-2022-0025-DRAFT-0204-770 | Stephani Ballard Wagner | Individual | None | General Wildlife | • BOEM should reject or defer the US Wind proposal until all studies are completed for the protection of marine and bird life, including whales, horseshoe crabs (a very significant feature of this Lease Area) and migratory birds. BOEM should require US Wind to complete all studies needed to ensure the protection of marine and bird species before reviewing the COP and issuing a draft EIS. |
| BOEM-2022-0025-DRAFT-0212-820 | Amy Kyle | Individual | None | General Wildlife | A recent review concludes that many additional steps are needed to protect areas that have both ecological values and values to humans for visual and scenic properties.1<br>BOEM up to now has failed to investigate the mid-Atlantic waters as being highly used even as findings from around the world demonstrate that careful consideration is warranted. Siting matters. Impacts should not be swept under the rug. |
| BOEM-2022-0025-EMAIL-275-840 | Michael Pentony | Federal agency | NMFS | General Wildlife | Overall, the abundance, distribution, and habitat use of ESA and MMPA protected species in the US Wind project area is not well documented. NMFS recommends the EIS acknowledge and identify these data gaps and include an analysis regarding the uncertainty of any determinations made in the EIS. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-EMAIL-276-904 | Jonathan Meade | Federal agency | NPS | General Wildlife | Overall, as the marine environment is built out by offshore wind projects in the vicinity, the potential cumulative impacts to marine and coastal species are currently unknown. Many of the potentially affected species do not occur in areas where utility-scale offshore wind exists today (e.g., Europe), and so there is no parallel data from which to draw conclusions. Due to U.S. Coast Guard regulations, the bases of the turbines would be lit and could become an attractant that alters current navigation patterns. Similarly, the turbines may disrupt the marine acoustic environment for acoustic sensitive species, such as whales, which in turn may inhibit communication or change patterns of behavior; little is known about the potential impacts of other potential disruptions to the marine environment, such as vibrations and electromagnetic fields, associated with wind turbines and cables. Marine mammals and sea turtles are already experiencing changes in migratory patterns related to climate change (e.g., changes in water temperatures and food source availability), which have potentially led to stranding and cold stunning events occurring more regularly in the Atlantic and changes to historic locations of turtle nesting sites. The NPS nonetheless has jurisdiction over those animals that occur within its boundaries, and to the degree possible protects those individuals and populations. As such, the NPS has a strong interest in potential disruptions to those individuals and populations that frequent Assateague Island NS and recommends that the relevant agencies develop monitoring plans so that subsequent projects can benefit from scientific data in this emerging area of study. The NPS requests that BOEM, USFWS, and NOAA/NMFS work to critically review impact assessments prepared for the US Wind project, consider cumulative effects, and require measures to avoid or minimize potential impacts that might overlap NPS management concerns for rare and imperiled species...Nearshore waters and coastal habitats, including seagrasses, marshes, mudflats, beaches, rocky intertidal shores, and other areas provide critical habitat for a variety of fish and wildlife species and impacts to those or adjacent waters can impact populations to varying degrees. All of these coastal resources are currently experiencing a variety of impacts associated with climate change and other stressors and as such may be even more vulnerable to potential impacts from offshore wind activities. Given the recent research related to wildlife and offshore wind, we recommend conducting a detailed review of recent research and monitoring associated with potential impacts to these habitats and species within and adjacent to areas under NPS jurisdiction. |
| BOEM-2022-0025-EMAIL-277-913 | Stepan Nevshehirlian | Federal agency | EPA | General Wildlife | A number of environmental factors, including water temperature, availability of prey, and disturbance contribute to occurrence of many species, including federally listed endangered species. The EIS should specifically address how Project impacts, including the presence of WTGs may affect foraging or migration patterns of species, from plankton to large whales listed under the Endangered Species Act.<br>•Impacts to plankton and food webs should be fully assessed. Phytoplankton are crucial to the biology of the ocean and essentially form the base of the aquatic food web. Impacts to plankton distribution and abundance that may be introduced from changes in currents, stratification, light, etc. created by the WTG and OSS should be fully evaluated.<br>•Section 8.2.1 of Volume II indicates that surface plankton could be entrained by jet plowing, but the duration and extent of impacts would be limited and short-term, as planktonic assemblages would recover from the disturbance. We recommend additional analysis of potential mortality based on the area of impact, time of year jet plowing will take place, volume of water, and species that will likely be present during the construction period.<br>•Changes to biological communities should also be considered in light of shifts from climate change. Detailed information regarding the baseline conditions and tracking regional shifts will reduce uncertainty in assessment of the Project's long-term effects. |
| BOEM-2022-0025-TRANS-20-69 | John Strangfeld | Individual | None | General Wildlife | Does it also create greater disservice with the fish and wildlife? |
| BOEM-2022-0025-TRANS-27-99 | Terry Sterner | Individual | None | General Wildlife | When you hear from the naysayers about turbans killing birds and sea life, find the facts before you react. Windows of oceanfront high rises claim a far higher number of bird lives, just behind the number that are taken annually by cats. As for sea life, I spent the last 67 of my 72 years living by the ocean as a surfer, an admirer of all things oceanic, for there would be no waves were it not for the wind. And from my experience, I know that seabound structures like piers and Turbines provide welcome habitat to nearly all sea life, especially fish. Because who amongst us does not love a free and easily obtainable meal that is especially healthy? You do. I do. And the fish do. |
| BOEM-2022-0025-TRANS-36-127 | Dave Arndt | Individual | None | General Wildlife | Always a big question what are the risks to fishing, to the ocean life? Birds? |
| BOEM-2022-0025-TRANS-59-197 | Susan Brennan | Non-governmental organization | Fenwick Island, Environmental Committee | General Wildlife | We honestly believe that besides the concerns for the migration of the endangered right whales, navigational issues, sound wave impact on marine life both during construction and the operation of the turbines, the location of the Atlantic Flyway directly impacted by the leases, as well as a constant blinking of lights over the ocean vista cable on Shoring, the critical concerns for the health of our horseshoe crab, and that an unobstructed view shed is a natural resource. |
| BOEM-2022-0025-DRAFT-0171-665 | Pam Pridgeon | Individual | None | Marine Mammals | Extremely endangered North Atlantic Right Whales have used their routes along the Delaware Coast for eons of time. The rich feeding grounds of the Delaware Bay and surrounding waters are used to feed and to teach their young how to forage.<br>https://books.google.com/books?id=2rkHQpToi9sC&pg=PA967&1pg=PA1967&dq=North+Atlantic+Right+whales+matilineal+fidelity+to+DE+Bay&source=bl&ots=hFICHA4fuw&sig=ACfU3U3NA9PcJbNx1GZakMImWcOnYCkGvQ&hl=en&sa=X&ved=2ahUKE<br>Studies show that OSW Farms are considered an Apex Predator. Large Whales are the cornerstone species for the health of our Planet Earth. Whales contribute more towards mitigating climate change than any orther orgasm or systm by way of being the primary source of fertilization for the microscopic phytoplankton, upon which every other organism depends. Phytoplankton in turn captrues carbon and produces HALF of the worlds oxygen! https://greatwhaleconservancy.org/how-whales-help-the-ocean/<br>Bottlenose Dolphins enjoy the waters off the Delaware Coast for 9 months of the year. Not only do they help sustain our Ocean Environment, they provide many hours of enjoyment to all who visit our beautiful beaches and those enjoying some time on the water. The joyful sounds of children excited by the antics of the dolphins can be heard up and down the beach.<br>The Sub-sea high voltage cables are known to produce electric magnetic fields. These fields can interfere with earths naturally occurring EMF's. As Sea Turtles, and other Marine life depend on the earths EMFs to follow their migratory routes and feeding grounds, more studies must be done prior to moving forward with approvals of OSW Farms. |
| BOEM-2022-0025-DRAFT-0184-702 | Jennifer Holmes | State agency | Delaware Department of Natural Resources and Environmental Control | Marine Mammals | As BOEM's evaluation of the Proposed Action moves forward, the DNREC recommends the following:<br>• Support additional research on potential impacts to marine mammals and sea turtles from changes in turbulence resulting from increased artificial structures in the water column. Research should include food resource monitoring in waters experiencing increased turbidity resulting from modifications to the wind field and installed turbine foundations.<br>• Support additional research on the effects of electromagnetic fields (EMF) on marine mammals and sea turtles to determine the potential for these EMF to disrupt or alter migration patterns of these species. |
| BOEM-2022-0025-DRAFT-0204-767 | Stephani Ballard Wagner | Individual | None | Marine Mammals | • US Wind acknowledges sightings of the critically endangered North Atlantic Right Whale and other endangered species in the lease area.<br>• Noise and potential adverse effect from such sonic activity also counsels against approval of the Project. At a minimum, prior to full consideration of an EIS, BOEM should require US Wind to measure the underwater sound levels of construction and of the proposed turbines in operation, and adopt a mitigation strategy to protect the Right Whales and other endangered species and ocean life. |
| BOEM-2022-0025-DRAFT-0205-785 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Marine Mammals | An additional 20 species are labeled as "rare" in the Project area, while six species are considered "uncommon". The COP, however, does not define any of these labels. Of the ten species listed as sighted in the Project area, only the harbor porpoise is excluded from further discussion in the COP.44 It is unclear what estimated max density threshold in the Project area and adjacent waters led to further examination and review by US Wind within the COP or why harbor porpoises were omitted from this analysis. Although the harbor porpoise is not an ESA-listed species or strategic stock, BOEM should provide this species with specific attention given its sensitivity to noise.45 |
| BOEM-2022-0025-EMAIL-275-856 | Michael Pentony | Federal agency | NMFS | Marine Mammals | The status of marine mammal stocks (see our stock status reports3), population trends, and threats should also be identified. Similar information should also be provided for all ESA listed species (see relevant status reviews on our ESA Species Directory, https://www.fisheries.noaa.gov/species-directory/threatened-endangered).4 As described in this attachment , new marine mammal densities, which represent the best available science, are now available for inclusion in the EIS.<br>4 Please note that NOAA Fisheries biological opinions should not be used as a reference unless referring to specific conclusions for which the particular project that the biological opinion was issued. We do not recommend relying on NOAA Fisheries Biological Opinions to support conclusions reached by BOEM for other projects that were not the subject of that Opinion. |

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| BOEM-2022-0025-EMAIL-275-875 | Michael Pentony | Federal agency | NMFS | Marine Mammals | The EIS should consider information in the 2021 draft marine mammal Stock Assessment Reports9 and the recently updated Duke marine mammal density models.10 Please also note that the Biologically Important Areas (BIAs)11 are undergoing changes; finalization of the updated website and database is scheduled for December 2022. The locations, timing, and Importance Scores of the updated and revised BIAs, once this information becomes available, should be considered in the development of the EIS. The project lease area overlaps with a migratory BIA for North Atlantic right whales. |
| BOEM-2022-0025-EMAIL-275-876 | Michael Pentony | Federal agency | NMFS | Marine Mammals | The EIS should also consider how any proposed wind farm may displace or alter fishing or existing vessel activity that may change the risk to protected species from interactions with fisheries or vessels either within or outside the lease area, including potential risks of interactions with recreational fishing activity around foundations and entanglement in marine debris that may become ensnared on the foundations. Additionally, the EIS should consider effects of any surveys that may occur following potential COP approval that may affect listed species (e.g., gillnet or trawl surveys to characterize fisheries resources), as well as any pre- or post-construction monitoring that may affect listed species and/or critical habitat. For further information on effects to consider, please refer to the ESA Information Needs document (linked above). |
| BOEM-2022-0025-EMAIL-275-877 | Michael Pentony | Federal agency | NMFS | Marine Mammals | It is our understanding BOEM will develop a Biological Assessment (BA) to support your eventual request for ESA section 7 consultation. While we understand that you intend to prepare the BA as a stand-alone document (i.e., you are not planning for the EIS to serve as the BA), we anticipate and expect that the description of the proposed action, scientific information and effects analysis in the BA will be consistent with the DEIS. We are not opposed to an approach whereby the EIS would serve as the BA, provided sufficient detail and analyses can be included. We understand the BA and the NEPA document are likely to evaluate effects of activities consistent with a design envelope and are likely to take a “maximum impact scenario” approach to assessing impacts to listed species that may occur. We encourage early coordination with us to determine which impact-producing factors should be analyzed based on a “worst case” or “maximum impact” scenario and which parts of the design envelope would need to be narrowed to carry out a reasonable analysis that would support your request for section 7 consultation. |
| BOEM-2022-0025-EMAIL-275-879 | Michael Pentony | Federal agency | NMFS | Marine Mammals | Because activities associated with the construction of US Wind have the potential to result in the take of marine mammals, we anticipate that a request for an ITA pursuant to section 101(a)(5) of the MMPA may be submitted to us by the project proponent. NMFS’ proposal to issue an ITA that would allow for the taking of marine mammals, consistent with provisions under the MMPA and incidental to an applicant’s lawful activities, is a major federal action under 40 CFR 1508.1(q)16, requiring NEPA review. Rather than prepare a separate NEPA document, NMFS, consistent with the CEQ regulations at 40 CFR 1506.3, intends to adopt BOEM’s Final EIS to support its decision to grant or deny US Wind’s request for an ITA pursuant to section 101(a)(5)(A) or (D) of the MMPA. NOAA may adopt a NEPA document prepared by another federal agency if the action addressed in the adopted document is substantially the same as that<br>being considered or proposed by NOAA, and NOAA, after independent review and evaluation, determines the document satisfies 40 CFR 1506.3 and NOAA’s implementing NEPA procedures.17<br>When we serve as a cooperating agency and we intend to adopt another agency’s EIS, we ensure all resources under our jurisdiction by law and over which we have special expertise are properly described and the effects sufficiently evaluated, documented, and considered by the lead agency EIS. Of particular importance is that the Draft and Final EIS address comments and incorporate edits NMFS provides during document development and cooperating agency review. As a cooperating agency per 40 CFR 1501.8, we must determine that the Final EIS properly addresses our comments and input in order for NMFS to determine the EIS is suitable and legally defensible for adoption per 40 CFR 1506.3 and NOAA’s implementing NEPA procedures, and subsequent issuance of an ITA. |
| BOEM-2022-0025-DRAFT-0015-231 | Anonymous Anonymous 3 | Individual | None | Materials and Waste Management | Abandoned and failed development projects are a blight on, and risk to, our environment. Bankruptcy processes allow project beneficiaries to walk away from their obligations once profitability dwindles. Safe cleanup and removal at the end of the installations' End of Life (EOL) must be ensured.<br><br>Prior to approving any such development in U.S. waters:<br>1) Require "US Wind" to develop and include in their development plan a cost estimate for the eventual removal and cleanup of the site(s), said plan to be reviewed and approved for accuracy and completeness by the U.S. Army Corps of Engineers (USACE).<br>2) Require "US Wind" to place in escrow sufficient funds to fully perform the eventual removal and cleanup of the site(s) upon their EOL prior to approving the start of installations and/or developments, said funds to be released upon EOL of the installation(s) for performance of the removal and cleanup. |
| BOEM-2022-0025-DRAFT-0020-240 | Elizabeth Reineck | Individual | None | Materials and Waste Management | There is a shelf life for putting down concrete and metal in a turbulent ocean. The operating wind turbines in Rhode Island have already been shut down for costly repairs with a faulty buried power line ($80 million-dollar price tag). In 20 years will these corroded structures be left behind and abandoned or will they be removed? What disruptions to marine wildlife and what pollution associated with any retrieval will this cause? Or are you going to leave a wasteland of metal/concrete debris in our ocean? |
| BOEM-2022-0025-DRAFT-0023-250 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Materials and Waste Management | Each offshore wind turbine and substation carries many gallons of lubricating oil and diesel oil listed in Appendix H of the COP. The total stored offshore is 508,078 gallons. A massive hurricane could threaten a major spill. The oil response plan seems inadequate to handle a major release and needs to be improved. |
| BOEM-2022-0025-DRAFT-0071-357 | Senator Mary Beth Carozza | State agency | Maryland State Senator District 38 | Materials and Waste Management | In addition to these homeland security concerns, I also am concerned about the cost and process of the decommissioning of the wind turbines once the equipment has been exhausted and is no longer useful. |
| BOEM-2022-0025-DRAFT-0175-670 | R. Stephen Amato | Individual | None | Materials and Waste Management | There is no history of the durability or life expectancy of the GE Haliade-X wind turbines. Smaller, ocean-mounted European wind turbines have lasted 15-20 years. The steel can be recycled, but the carbon composite blades do not degrade, and so far have wound up in landfills. |
| BOEM-2022-0025-DRAFT-0204-773 | Stephani Ballard Wagner | Individual | None | Materials and Waste Management | • Obviously, there is the risk for permanent ocean pollution if any of the system components become nonfunctional, or at the end of the Project’s useful life. |
| BOEM-2022-0025-DRAFT-0210-812 | Niall O'Malley | Individual | None | Materials and Waste Management | Operator & Developer Oil Spill Risk Experience: 1. How many Orstead and U.S. Wind offshore windfarms have had vessel collisions and/or sinkings? The proposed windfarms are adjacent to major shipping lanes. How many vessel collisions and/or sinkings have resulted in hull breach and direct uncontrolled discharge of diesel, gasoline or bunker fuel due to navigation errors, engine failure, or weather events? When an uncontrolled fuel spill pollutes the North Bethany beaches what is Orsted’s and U.S. Winds’ responsibility to mitigate and pay for the cleanup? |
| BOEM-2022-0025-DRAFT-0210-813 | Niall O'Malley | Individual | None | Materials and Waste Management | Operator & Developer Hurricane Risk Experience: 1. How many Orstead and U.S. Wind windfarms are built in hurricane zones? Of the 30 Orstead offshore windfarms how many have sustained hurricane damage?<br>2. Assuming a direct hit from a hurricane or a northeaster would the devastation be compounded by a loss of power due to the proposed windfarms?<br>3. Do Orstead or U.S. Wind have insurance for storm risk? Separately, are their parent company guarantees from Ørsted A/S? Skipjack Offshore Energy, LLC was formed in 2016 and is wholly owned by another Delaware LLC formed in 2009, which is in turn an indirect subsidiary of Ørsted A/S. Does U.S. Wind have parent company guarantees? U.S. Wind, headquartered in Baltimore, was established in 2011. U.S. Wind, Inc. is a subsidiary of Italian-based Renexia Wind Offshore SpA (80% owner of the U.S. Wind subsidiary), part of Toto Holding SpA, also an Italian company. An additional ownership company in the U.S. Wind project is AIOF II NJord Co-Invest, LP, which is managed by Apollo Global Management.<br>4. Ørsted A/S is a publicly traded company on the NASDAQ Nordic exchange (ticker ORSTED). What are Orsted’s Securities and Exchange Commission (SEC) disclosures related to climate change that pertain to this project? |
| BOEM-2022-0025-EMAIL-275-864 | Michael Pentony | Federal agency | NMFS | Materials and Waste Management | The EIS should also evaluate the potential impacts of chemical emissions (e.g. sulfur hexafluoride), including the release of chemical residues from wind farm operating materials and corrosion-protection systems. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-EMAIL-277-920 | Stepan Nevshehirlian | Federal agency | EPA | Materials and Waste Management | Contamination and Waste<br>The potential for existing soil or water contamination should be assessed in the study area for both onshore and offshore facilities. EPA recommends the EIS describe any known hazardous materials that may be impacted by construction of onshore facilities, including location of contaminated soils, sediments, or groundwater, and evaluations that have been conducted or are planned to assess contamination.<br>EPA notes that two Superfund sites are located in the vicinity of Millsboro in Sussex County, Delaware, The Millsboro TCE Site contaminated groundwater and wells. In October 2005, the state water authority detected trichloroethylene (TCE) at a concentration that exceeded the national drinking water standard. The Town of Millsboro is currently filtering groundwater and sampling drinking water to ensure there are no detectible levels of TCE. The NCR Corp. (Millsboro Plant) site was added to the Superfund program's National Priorities List in 1987. Waste disposal practices contaminated soil and groundwater with hazardous chemicals including TCE and chromium. Clean up is ongoing.<br>Impacts from decommissioning are expected to include the removal and disposal of the wind turbines and foundations and other components. Section 7.4 and 7.5 of Volume I indicate that the WTGs and foundations will be transported for recycling and/or disposal onshore. Consistent with US Wind's commitment to environmental protection, EPA suggests that US Wind commit to recycling and reuse options for Project components to the extent possible. |
| BOEM-2022-0025-TRANS-35-121 | Kathy Phillips | Individual | None | Materials and Waste Management | I'd also like to mention that this nation is already littered with thousands of leaking and non functional oil wells and it lacks the ability to remove this infrastructure that is owned by the oil companies. Too often a company will declare bankruptcy and just run away from the problem. Therefore, BOEM must have a provision for the eventual removal of outdated and non functioning infrastructure by the government if a company cannot or will not pay their bonds. |
| BOEM-2022-0025-DRAFT-0023-247 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Mitigation and Monitoring | US Wind left several mitigation plans undefined and incomplete<br>To mitigate the viewshed impact of aircraft warning lights US Wind states on page 23 of Volume 2 it will use Aircraft Detection Lighting Systems (ADLS) if "commercially feasible". These systems only turn on the aviation warning lights if aircraft are in the area. US Wind does not define the terms or conditions of what would make the systems commercially feasible. Without a solid commitment to use ADLS the EIS should assume the system will not be used and define the nighttime impact on the viewshed as major. |
| BOEM-2022-0025-DRAFT-0046-293 | Victoria Venable | Non-governmental organization | Chesapeake Climate Action Network | Mitigation and Monitoring | We urge BOEM to review existing research on mitigating the environmental disruptions from the construction of this important project while also valuing the significant benefits of offshore wind to the biological, physical, and socioeconomic environment throughout the Environmental Impact Statement (EIS). |
| BOEM-2022-0025-DRAFT-0165-638 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Mitigation and Monitoring | We will provide an additional comment letter on the draft BOEM guidance for mitigating impacts of wind energy on commercial and recreational fisheries. The US Wind EIS should reflect the final version of this guidance. For example, the current US Wind project design envelope includes a target burial depth of 3.3 to 9.8 feet for inter-array cables, while the draft guidance recommends a minimum burial depth of 6 feet. |
| BOEM-2022-0025-DRAFT-0189-718 | Susan Stevens Miller | Non-governmental organization | Earthjustice | Mitigation and Monitoring | Science-based environmental mitigation efforts are essential for minimizing potential impacts to coastal and marine wildlife from the development of offshore wind facilities. These potential impacts include, but are not limited to, underwater noise from pile driving for foundation installation; increased risk of vessel strikes; turbine collisions; habitat disturbance; and potential displacement of a range of species. BOEM must include stringent protections in the EAS to minimize and mitigate potential impacts from US Wind's offshore project. |
| BOEM-2022-0025-DRAFT-0189-719 | Susan Stevens Miller | Non-governmental organization | Earthjustice | Mitigation and Monitoring | A. BOEM Must Impose Stringent Conditions to Protect the North Atlantic Right Whale and Other Marine Mammals. Specifically, BOEM should require:<br>1.No pile driving November 1 – April 30.<br>2.A visual and acoustic clearance zone and exclusion zone of at least 5000 meters for whales and dolphins around each vessel conducting activities with noise levels that could result in injury or harassment;<br>3.A minimum of 10 dB (SEL) must be attained in the field during construction in combined noise reduction and attenuation;<br>4.Field measurements should be conducted on at least the first three piles installed, and ideally periodically throughout project construction;<br>5.Both near and far-field best available control technologies must be used to attain the maximum level of noise reduction and attenuation possible; Monitoring of the acoustic clearance and exclusion zone will be undertaken using near real-time passive acoustic monitoring (PAM), assuming a detection range of at least 10,000 meters<br>7. Monitoring should be undertaken from a vessel other than the pile driving vessel, or from a stationary unit, to avoid the hydrophone being masked by the pile driving vessel or development-related noise;<br>8. If a small whale or dolphin is visually or acoustically detected within the 5000 meter clearance zone, activities with noise levels that could result in injury or harassment should not be initiated;<br>9. If a North Atlantic Right Whale is detected acoustically or visually detected within the 5000 meter visual exclusion zone, pile driving must be halted;<br>10. Monitoring of the visual clearance and exclusion zone will be undertaken by vessel-based PSOs stationed at the pile driving site and on additional vessels, as appropriate, to enable visual monitoring of the minimum 5,000 meter clearance zone within pre-clearance monitoring period and during pile driving activity;<br>11. On each vessel, there must be a minimum of four PSOs following a two-on, two-off rotation, each responsible for scanning no more than 180° of the horizon per pile driving location;<br>12. Additional vessels must survey the clearance and exclusion zones at speeds of 10 knots or less;<br>13. Following shutdown for protected species, acoustic and visual monitoring of exclusion zone for 60 minutes and clear of protected species for 60 minutes prior to initiating soft start. Visual observation of the minimum 5,000 meter visual clearance zone should continue until 30 minutes after pile driving restart.<br>14. Acoustic and visual monitoring must be required and begin at least 30 minutes prior to the commencement or re-initiation of the activity and be conducted throughout the activity;<br>15. Monitoring of the acoustic clearance zone should be undertaken using near real-time passive acoustic monitoring (PAM) from a vessel other than the survey vessel, or from a stationary unit, to avoid the hydrophone being masked by the survey vessel or development-related noise;<br>16. Monitoring of the visual clearance zone should be undertaken by vessel-based protected species observers stationed on the survey vessel to enable monitoring of the entire 5000 m clearance zone for marine mammals. On each vessel, there must be a minimum of four observers following a two-on, two-off rotation, each responsible for scanning no more than 180° of the horizon;<br>17. All personnel working offshore should receive training on observing and identifying marine mammal species; and<br>18. All vessels responsible for crew transport should use thermal detection systems to supplement visual monitoring of marine mammals. |
| BOEM-2022-0025-DRAFT-0205-776 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Mitigation and Monitoring | Mitigation recommendations during site assessment and characterization<br>i. Prohibit site assessment and site characterization activities during times of highest risk (North Atlantic right whales only):<br>ii. Require diel restrictions on site assessment and characterization activities:<br>iii. Require the following clearance zone and exclusion zone distances prior to activities known to injure or harass large whales (large whales only):<br>iv. Require shutdown of activities if a large whale is detected visually or acoustically (large whales only):<br>v. Require robust monitoring protocols during pre-clearance and when site assessment and characterization activities are underway:<br>vi. Require mandatory vessel speed restrictions:<br>vii. Implement other vessel-related measures:<br>viii. Require underwater noise reduction to the fullest extent feasible:<br>ix. Require mandatory reporting of all North Atlantic right whale, other large whale species, and sea turtle detections: |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0205-777 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Mitigation and Monitoring | Section 2: Mitigation recommendations for pile-driven foundations<br>i. Prohibit pile driving during times of highest risk (North Atlantic right whales only):<br>ii. Restrict pile driving activity at night and during periods of low visibility (all large whale species and sea turtles):<br>iii. Require underwater noise reduction levels based on best commercially available technology<br>(all large whale species):<br>iv. Require the following clearance zone distances prior to pile driving and exclusion zone distances during pile driving (for a minimum of 10-12 dB noise reduction (see subsection (iii));<br>North Atlantic right whales only):<br>v. Require shutdown of activities if a large whale is detected visually or acoustically (for a minimum of 10-12 dB noise reduction (see subsection (iii)); North Atlantic right whales only):<br>vi. Require robust near real-time monitoring protocols during pre-clearance and when pile driving activity is underway (all large whale species):<br>vii. Require mandatory vessel speed restrictions (all large whale species and sea turtles):<br>viii. Implement other vessel-related measures (all large whale species and sea turtles):<br>ix. Require mandatory reporting of all North Atlantic right whale, other large whale species, and sea turtle detections: |
| BOEM-2022-0025-DRAFT-0205-778 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Mitigation and Monitoring | Section 3: Mitigation recommendations for gravity-based and suction bucket foundations<br>i. Require clearance zone and exclusion zone distances that will eliminate Level A take and minimize behavioral harassment (large whale species only):<br>ii. Require shutdown of activities if a large whale is detected visually or acoustically (large whale species only):<br>iii. Require robust near real-time monitoring protocols during clearance and installation:<br>iv. Require mandatory vessel speed restrictions:<br>v. Implement other vessel-related measures:<br>vi. Require mandatory reporting of all North Atlantic right whale, other large whale, and sea turtle detections: |
| BOEM-2022-0025-DRAFT-0205-786 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Mitigation and Monitoring | it is imperative that US Wind implement additional protective measures for the right whale. For example, as construction activities are planned to occur year round,49 US Wind should ensure that vessel operators monitor National Oceanic and Atmospheric Administration (NOAA) Fisheries North Atlantic right whale reporting systems for the presence of the right whale year round, not solely from November 1 to April 30 as suggested in the COP50 for vessel strike avoidance. |
| BOEM-2022-0025-DRAFT-0205-787 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Mitigation and Monitoring | Additionally, we note that within the COP, exclusion and clearance zones have not been established for pile driving activities.51 We encourage that US Wind establish the following clearance zone distances prior to pile driving and exclusion zone distances during pile driving for the NARW and adopt the additional mitigation measures enumerated in Attachment 2:<br>1. A visual clearance zone and exclusion zone must extend at minimum 5,000 m in all directions from the location of the driven pile.<br>2. An acoustic clearance zone must extend at minimum 5,000 m in all directions from the location of the driven pile.<br>3. An acoustic exclusion zone must extend at minimum 2,000 m in all directions from the location of the driven pile.<br>We strongly recommend that US Wind employ robust near real-time monitoring protocols using passive acoustic monitoring (PAM). While the COP states that US Wind will continue to explore “additional” opportunities for PAM in conjunction with other research efforts, they have not included any PAM within their current mitigation plans.52 BOEM should require a robust monitoring plan, based on the recommendations in Attachment 1, which includes the use of PAM. |
| BOEM-2022-0025-DRAFT-0205-793 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Mitigation and Monitoring | The adaptive management plan must explicitly outline a strategy to employ adequate mitigation measures, based on the impacts observed through monitoring efforts. In this manner, the Draft EIS can account for the reasonably foreseeable impacts of developing this and future projects and a commitment to addressing those impacts. |
| BOEM-2022-0025-DRAFT-0212-822 | Amy Kyle | Individual | None | Mitigation and Monitoring | Prevention strategies should be included in the environmental review process especially with regard to regional scale resources. It is not sufficient to fall back to using mitigation strategies “when practicable” as the US Wind document says over and over again. This provides no level of limit on impact and is meaningless. |
| BOEM-2022-0025-EMAIL-275-859 | Michael Pentony | Federal agency | NMFS | Mitigation and Monitoring | While some mitigation options may be discussed as suggestions for the developer to implement at their own discretion, these discretionary mitigation measures are not certain to occur and therefore should not be incorporated into the project impacts analysis. |
| BOEM-2022-0025-EMAIL-275-869 | Michael Pentony | Federal agency | NMFS | Mitigation and Monitoring | The EIS must clearly identify what mitigation measures are included as part of the proposed action and thus evaluated in the analysis, which measures are proposed to be required as a condition for COP approval, and measures that are optional and could be implemented by the developer to potentially reduce impacts. The document should provide information on how mitigation measures are considered in the context of the definition of effects levels (e.g. negligible, minor, moderate, major), and how mitigation would reduce or offset those levels of effect. The effectiveness of any proposed mitigation should also be evaluated in the NEPA document. Measures to avoid and minimize impacts such as speed restrictions for project vessels, soft start procedures, noise dampening technologies, construction and survey time of year restrictions, anchoring plans, or micro-siting should be discussed in detail, including what resources would benefit from such mitigative measures and how/when such benefits (or impact reductions) would occur. The EIS should analyze temporary effects and anticipated recovery times for marine resources within the impacts analysis. While the COP includes some discussion of mitigation measures, there is insufficient detail provided to fully evaluate how such measures would be able to reduce potential impacts of the project on marine trust resources. |
| BOEM-2022-0025-EMAIL-275-870 | Michael Pentony | Federal agency | NMFS | Mitigation and Monitoring | While the project should be planned and developed to avoid and minimize adverse effects to marine resources and existing uses (e.g., fisheries habitat, fishing, and NMFS scientific survey operations) to the greatest extent practicable, compensatory mitigation should be proposed to offset unavoidable permanent and temporary impacts. This should include discussion and evaluation of potential compensatory mitigation for unavoidable adverse impacts to fisheries habitats and the lost functions and values resulting from those impacts. Compensatory mitigation for both ecological losses as well as social and economic losses should be discussed in the EIS, including any loss of fisheries revenue or increases to operational costs such as increased steaming time resulting from the construction and operation of the project and conservative quotas set in response to reduced scientific survey access and associated increasing uncertainty in stock assessments along with any potential proposed measures to compensate for such losses. Additionally, the potential for bycatch measures resulting from protected species interactions due to shifts in fishing activity and increased uncertainty in protected species assessments should be analyzed and discussed. Details of compensation plans describing qualifying factors, time constraints, allowed claim frequency, etc. should also be included when possible, particularly if used as mitigation measures to reduce economic impacts from access loss/restriction, effort displacement, or gear damage/loss. Finally, mitigation necessary to offset negative impacts to longstanding marine scientific survey operations (e.g., loss of access to project areas, changes to sampling design, habitat alterations, and reduced sampling due to increased transit time) and fisheries dependent data collections must also be considered and evaluated in the document (see description of scientific survey impacts below). |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-EMAIL-275-878 | Michael Pentony | Federal agency | NMFS | Mitigation and Monitoring | ● Mitigation measures should be required during noise-producing activities (e.g., pile driving) that will act to reduce the intensity and extent of underwater noise and avoid exposure of listed species to noise that could result in injury or behavioral disturbance.<br>● The use of protected species observers to establish and monitor clearance zones prior to pile driving is essential, and project scheduling should take into account the need for adequate visibility during the pre-pile driving clearance period, as well as for the duration of pile driving activities.<br>● Real-time and archival passive acoustic monitoring should also be used as a secondary detection/monitoring system during construction, operation and maintenance, and decommissioning to increase situational awareness in vessel corridors and around the project area, and during construction, operation and maintenance, and decommissioning to monitor the distribution of marine mammals in the lease area.<br>● We encourage BOEM to work with US Wind to develop a project schedule that minimizes potential impacts to North Atlantic right whales. Specifically, you should consider time of year restrictions for pile driving that would avoid pile driving from November 1 -April 30 when the density of North Atlantic right whales is highest in the lease area. You should develop robust measures for other times of year that would minimize the exposure of right whales to noise that could result in behavioral disturbance. Marine mammal responses to sound can be highly variable, depending on the individual hearing sensitivity of the animal, the behavioral or motivational state at the time of exposure, past exposure to the noise which may have caused habituation or sensitization, demographic factors, habitat characteristics, environmental factors that affect sound transmission, and non-acoustic characteristics of the sound source, such as whether it is stationary or moving (NRC 2003).13<br>● Mitigation measures should also be included that minimize the risk of vessel strike for whales, sea turtles, and Atlantic sturgeon, including consideration of vessel speed restrictions regardless of vessel size and robust measures to monitor vessel transit routes for North Atlantic right whales. Recent events and new information14 demonstrate that large whales are susceptible to lethal vessel strikes from vessels of all sizes. NMFS is currently considering the recommendations of a June 2020, assessment15 of its vessel speed rule (50 CFR § 224.105) and related public comments as we explore potential options for further reducing vessel strikes of North Atlantic right whales. All potential measures to further reduce the risk of vessel strike for North Atlantic right whales, including the recommendations of the assessment, and any information provided in any future rulemaking, should be considered as potential conditions as BOEM reviews the US Wind COP for potential approval or modification.<br>● Any surveys or monitoring that are carried out related to the project (e.g., gillnet or trap surveys to document fisheries resources) must carefully consider the effects to North Atlantic right whales and other ESA-listed species, as well as critical habitat. Measures<br>should be considered to eliminate the potential for entanglement of whales and to minimize risk to sea turtles and listed fish during survey and monitoring activities |
| BOEM-2022-0025-EMAIL-276-900 | Jonathan Meade | Federal agency | NPS | Mitigation and Monitoring | In the case of development of the US Wind lease area, NPS encourages measures to protect the night sky. NPS supports use of Aircraft Detection Lighting Systems (ADLS; or a similar system) to turn aviation obstruction lights on and off in response to detection of nearby aircraft.<br>In general, NPS recommends the following measures protective of night skies. BOEM can find them discussed further in NPS Best Practices for Sustainable Outdoor Lighting.<br>Sustainable Outdoor Lighting - Night Skies (U.S. National Park Service) (nps.gov)<br>• Security lighting should be directed downward, recessed, and full cut-off shielded. Some lights should have motion sensors added.<br>• Control: lights should be off when not needed. This applies to both the construction phase and operation phase.<br>• Brightness: the minimum lumen output needed should be used.<br>• Warm color-temperature light: use amber lights or soft white, instead of bright white light, preferably no greater than 2,700k.<br>• For the offshore component, we request visual simulations for both static images and light-flashing animation at night from multiple KOPs inside the national park boundary. NPS can assist with gaining access. |
| BOEM-2022-0025-EMAIL-277-928 | Stepan Nevshehirlian | Federal agency | EPA | Mitigation and Monitoring | EPA recommends that BOEM consult with the resource agencies regarding appropriate measures to reduce impacts on species, habitats, communities, navigation on sea and in the air, and other resources and this coordination be documented in the EIS. We recommend that the full suite of mitigation options be explored, including siting for avoidance, construction methods, new technology, time of year restrictions, noise BMPs, and other measures that reduce impacts. As indicated, we encourage taking measures to reduce greenhouse gas generation during construction and decommissioning of the project.<br>EPA recommends using science-based adaptive management actions to inform appropriate mitigation. We recommend specifically identifying how adaptive management will be implemented, including any thresholds or success criteria that will be used. |
| BOEM-2022-0025-TRANS-14-49 | Lauren Brown | Individual | None | Mitigation and Monitoring | In addition, certain technologies, such as if they suggested using state of the art noise reduction technology as well as reducing light pollution so that the light only comes on when a low lying aircraft goes by. So I hope that they continue to work with this technology as it will be helpful for wildlife. |
| BOEM-2022-0025-TRANS-2-7 | Russell Kovach | Individual | None | Mitigation and Monitoring | And I was just reading a recent study that showed that simply painting the tips of the blades a different color can also significantly reduce bird collisions as well, meaning that it's likely that next to no birds will ever be killed by these windmills. |
| BOEM-2022-0025-DRAFT-0020-239 | Elizabeth Reineck | Individual | None | Navigation and Vessel Traffic | The current proposal also puts wind turbines near a major shipping channel. Vessel collision would seem to be a risk. There was also a recent wind turbine failure (with wind turbine debris crashing into the ocean) in Denmark and Orsted called for a “no sailing zone” around the turbines. How will this work with our major shipping channel into Philadelphia and with Ocean City’s recreational and commercial fishing industry? |
| BOEM-2022-0025-DRAFT-0023-249 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Navigation and Vessel Traffic | The risk of allision, vessel collision with wind turbine structures, is discussed starting on page 226 of Volume 2. Estimates for the frequency of larger vessel impacts are shown, and would be rare. However the total allision rate shown in Appendix K indicates an increased rate of about one impact every three years. Allision should be considered a potential major impact as defined in the EIS.<br>Summaries in the sections on potential impacts on the military, commercial aviation, radar, and the Coast Guard covered on pages 226 to 255 of Volume 2 are all stated as awaiting review by those agencies. The EIS should not be started until those reports are complete. Of special concern is the statement on Page 230, “Numerous factors may impact marine radar and post-construction analysis may be conducted to identify effects on marine radar and to assess mitigation methods”. We already know the impacts are disastrous from the serious interference with marine radar occurring from just five turbines off the coast of Block Island. Up to 30 phantom turbines are visible on radar images from actual ships navigating near Block Island with no way to tell where the real turbines are. Serious radar interference is known now and mitigation plans need to be complete before anymore offshore wind projects are approved by BOEM. |
| BOEM-2022-0025-DRAFT-0071-356 | Senator Mary Beth Carozza | State agency | Maryland State Senator District 38 | Navigation and Vessel Traffic | Along with the visibility issues that have been raised by the town of ocean city for the past several years, I consistently have raised additional concerns about the impact of the larger turbines on commercial fishing, maritime transportation, and military communications. the spinning blades create false radar images which are a hazard to marine traffic, can hinder coast guard search and rescue efforts, and block military radar installations from detecting hostile aircraft and other objects. |
| BOEM-2022-0025-DRAFT-0124-517 | Greg Venit | Individual | None | Navigation and Vessel Traffic | Please request a safety study about the shifting sand bottom, sandbars, that are well known to boaters. The environmental impact and safety issues on Indian River must be studied before approvals are issued. Please consider Public Safety. |
| BOEM-2022-0025-DRAFT-0154-603 | World Shipping Council | Non-governmental organization | World Shipping Council | Navigation and Vessel Traffic | The U.S. Coast Guard’s MPG expressly state that for Wind Energy Area development near port approaches and TSS – such as US Wind’s proposal – a buffer zone should be 2 nautical miles from the parallel outer or seaward boundary of a traffic lane and 5 nautical miles from the entry/exit termination of the TSS. The 5 nautical mile buffer zone is necessary to enable vessels to detect one another visually and by radar in the TSS entry and exit area where vessels are converging and diverging from multiple locations.....As currently proposed, US Wind’s project has multiple lease blocks that from the Mid-Atlantic Maritime Portal appear to fall within the 2 and 5 nautical mile buffer zones, including, but not limited to, portions of Block Numbers: 6624, 6674, 6724, 6725, 6726 and 6726F, and the entirety of Block Numbers: 6726 A-B, 6675 M-P, 6676 M, 6675 I-L, 6675 E-H, 6675 A-C, 6625 M-N, 6625 I, and 6625 E.... |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
|---|---|---|---|---|---|
| BOEM-2022-0025-DRAFT-0196-737 | Brian Vahey | Non-governmental organization | The American Waterways Operators | Navigation and Vessel Traffic | The US Wind lease area OSC-A 0490 specifically sits alongside the Coast Guard's proposed Cape Charles to Delaware Bay Fairway and like other leases in this area its location encroaches on the navigation industry's need for 9 NMs of transit space. When developing the draft EIS, we would ask that BOEM, and US Wind, consider this navigation hazard and consider allotting a 2 NM safety buffer in the western portion of OSC-A 0490 to help protect navigation safety by providing extra transit space. This is a busy maritime route. Wind energy development that conflicts with such traditional navigation lanes increases the risk of collisions between towing vessels and other vessels or allisions with wind energy installations. ACPARS proposed a 9 NM width to accommodate towing vessels transiting abreast during a variety of sea states, giving operators more time to adhere to the Navigation Rules and react in the case of an unforeseen safety incident. Greater width allows operators in both directions to safely navigate past one another while also avoiding deep draft vessels transiting across the fairway. We have urged the Coast Guard to expand the proposed fairways to 9 NM, and we hope that they will do so in the forthcoming notice of proposed rulemaking. We ask that BOEM adheres to the spirit of the ACPARS recommendations and not allow construction in the portions of the proposed US Wind lease area that would overlap with the safety fairway and the 2 NM safety buffer. AWO actively supports the development of offshore wind energy and urges BOEM to consider the environmental and socioeconomic impact of shifting cargo to landside modes should navigation become less safe. AWO members are making large investments to take part in this burgeoning industry. We urge BOEM to engage with this industry as a stakeholder and a partner. It is unclear to us whether BOEM and the Coast Guard have conducted a Navigation Safety Risk Assessment on this lease area, but if so the towing industry was not engaged. To ensure continued safe operations along the Atlantic Coast and to protect the nation's supply chain, the placement of the US Wind lease area must coexist with barge and towing vessel traffic. |
| BOEM-2022-0025-DRAFT-0197-738 | Brian Vahey | Non-governmental organization | The American Waterways Operators | Navigation and Vessel Traffic | Same comment as BOEM-2022-0025-DRAFT-0196 |
| BOEM-2022-0025-DRAFT-0199-744 | Susan Brennan | Individual | None | Navigation and Vessel Traffic | 4. In the scoping meeting many comments were made regarding not only the navigational and search/rescue concerns with the installation of the turbines and substations, but the blinking lights that will be atop each required for aircraft safety. If I recall correctly, the response was that the contractor, US Wind is looking into a new motion sensing apparatus that would only come on when an aircraft was xx miles away. This equipment if I understood correctly has not been manufactured yet. This is critical, not only to everyone on shore looking at 100's of blinking lights from dusk until dawn, but for the pilot flying the aircraft. Unfortunately, I tried to review the scoping meeting recordings earlier this week, however, BOEM did not have them online as of Wednesday 7/6 afternoon. I therefore was unable to confirm the response. |
| BOEM-2022-0025-DRAFT-0212-825 | Amy Kyle | Individual | None | Navigation and Vessel Traffic | Navigation Conflicts and Dangers are not adequately addressed and of considerable concern<br>As you are aware the National Academy of Sciences produced a peer reviewed report after an expert panel was convened to consider the potential hazards of offshore wind turbines to navigation systems. The results are chilling. Offshore wind turbines do in fact interfere with navigation radar systems now deployed, and the National Academy of Sciences did not identify any solution to this. This means that both large ships and tiny boats that use radar, especially in times of limits visibility, will not be able to accurately detect the location of the turbines.<br>When the leased areas are so close to the shoreline as they are along Delaware and Maryland, when you look at the other leased areas in combination of those for US Wind, it is hard to see how boat traffic an be maintained. This is for commercial, recreational, and chartered boats. How can maritime users maintain their activities and in many cases livelihoods if they can no loner safety navigate in the vicinity of the wind turbines, which will line the coastline if the leases are built out at a short distance offshore. Combine this with the immediate proximity of the heavily traveled shipping lanes right beyond these leased reacts, what are mariners going to do? Go out into the shipping lanes to avoid the turbines that they cannot see on radar?<br>In other contexts, it appears that BOEM has been far more careful about creating distance between active shipping channels and leased areas to be built full of turbines. However in the early Maryland leases they were not on top of this and heave created what looks like a nightmare scenario. This needs to be analyzed by objective individuals who are not proponents of the current leased areas to fairly determine whether safety hazards can be avoided and at what cost. |
| BOEM-2022-0025-EMAIL-275-841 | Michael Pentony | Federal agency | NMFS | Navigation and Vessel Traffic | The project area overlaps with seven NOAA scientific surveys which are necessary to support the assessment, management, and conservation of important marine resources for which NOAA is responsible. |
| BOEM-2022-0025-EMAIL-277-927 | Stepan Nevshehirlian | Federal agency | EPA | Navigation and Vessel Traffic | The EIS should address traffic and transportation impacts, including an evaluation of potential effects associated with moving components via water and/or overland. The impacts of the wind energy construction and operation on navigation and shipping lanes, SAR capabilities, commercial and recreational fishing, military use, air traffic, and recreational use should be updated with the best available information. |
| BOEM-2022-0025-TRANS-16-55 | Seth ?? | Individual | None | Navigation and Vessel Traffic | But, Anna, for you and for all the scientists that are studying the impact, I'd like to point out Beach Cove and Old Basin Cove. If the  cables do come in 3 hours to the southwest, you have Old Basin Cove and Beach Cove. And as an avid user of those two cove, I know that over the years, the silt has already filled these coves into the point that the marked channels are barely navigable. So just as you study the impact on the environment of these two coves, as well as the also includes the navigation of these two cove. |
| BOEM-2022-0025-DRAFT-0027-264 | Amy Kyle | Individual | None | NEPA/Public Involvement Process | I am writing to request an extension to the 30-day period for submission of comments related to the scoping of the environmental impact statement for the US Wind project off Maryland and Delaware. Two weeks ago, BOEM released two volumes of nearly 500 pages related to the US Wind project area. These two main volumes are accompanied by many attachments, listed below. Some of the cited attachments turn out not be finished or available. You cannot expect the public to review and understand this much information in 30 days, especially in a 30-day period that has not one but two federal holidays. Particularly when some of the key information is being withheld or is not finished. Much of this information has been held secret to this point. US Wind says this is because of BOEM requirements. Whatever the reason, there has not been an informal exchange of information as sometimes precedes a formal review period and can reduce the time required for the formal review period. The environmental review for this project is important, as the assessment done at the leasing stage was very limited and was based on clearly inadequate data. There are real issues for the siting and development of offshore wind facilities. BOEM's leadership has promised a scientifically credible process that addresses community and public concerns. Such a process requires capacity for the public to review materials. Setting the shortest possible review period for release of such an extensive record undermines the claim of scientifically credible process and calls into question the integrity of the agency statements. |
| BOEM-2022-0025-DRAFT-0040-282 | Michael Emerson | Federal agency | USCG | NEPA/Public Involvement Process | As a cooperating agency, the Coast Guard acknowledges the intent to prepare an EIS, and looks forward to contributing throughout the review process. |
| BOEM-2022-0025-DRAFT-0049-310 | Greg Culver | Individual | None | NEPA/Public Involvement Process | BOEM should reject or defer the US Wind proposal until all studies are completed for the protection of marine and bird life, including whales, horseshoe crabs and migratory birds. |
| BOEM-2022-0025-DRAFT-0066-344 | Calhoun Bond | Non-governmental organization | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0067-349 | Janet Webb | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0068-351 | Kimberly Beals | Individual | None | NEPA/Public Involvement Process | 3.) BOEM should reject or defer the US Wind proposal until all studies are completed for the protection of marine and bird life, including whales, horseshoe crabs and migratory birds. |
| BOEM-2022-0025-DRAFT-0076-370 | Mark Newcomer | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0080-378 | fred levy | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0082-384 | Danny Smith | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
|---|---|---|---|---|---|
| BOEM-2022-0025-DRAFT-0083-389 | Robert Kowalski | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0084-394 | Andrew Levy | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0088-406 | Brett Gauntlett | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0093-418 | Kirk Simme | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0095-424 | David Dempsey | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0097-431 | James Roberts | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0099-437 | Mary Simme | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0101-443 | MICHAEL PINKERT | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0103-450 | Beverly Newborn | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0105-456 | Matthew Morris | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0106-459 | Dennis OBrien | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0108-468 | Betsy Brino | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0110-472 | John Neylan | Individual | None | NEPA/Public Involvement Process | Please vet these proposed wind farms as comprehensively as possible. Inform the public of where the process stands as much as possible, and be very transparent. |
| BOEM-2022-0025-DRAFT-0112-476 | Todd Goldthwaite | Individual | None | NEPA/Public Involvement Process | Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0113-483 | Doug Brinkley | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0114-488 | Julia Deves | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0115-493 | Aaron Deves | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0116-498 | Kamran Givpoor | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0118-502 | Robert Taylor | Individual | None | NEPA/Public Involvement Process | Thirty days is way too little time for public comment om this project. |
| BOEM-2022-0025-DRAFT-0119-507 | Anonymous Anonymous 13 | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0120-512 | James Bond | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0125-523 | Behnaz Yalda | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0126-528 | Penn Wyrough | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0132-541 | John Harman | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0133-547 | Donna Fisher | Individual | None | NEPA/Public Involvement Process | Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0138-558 | Paul Taltavull | Individual | None | NEPA/Public Involvement Process | Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0140-565 | Anonymous Anonymous 15 | Individual | None | NEPA/Public Involvement Process | Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0142-572 | Julie Grohovsky | Individual | None | NEPA/Public Involvement Process | Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0145-582 | Sandy A | Individual | None | NEPA/Public Involvement Process | Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0147-590 | E. B. Cohen | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0149-596 | Charles Licameli | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0155-608 | Andrew Finley | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0156-613 | Joanne Finley | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0157-618 | Anonymous Anonymous 16 | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0158-622 | Piper Bond | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0165-635 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | NEPA/Public Involvement Process | Consistency in approaches, while adopting lessons learned from one project to the next will benefit stakeholders who engage in the review process for these complex projects. As we have stated in several previous comment letters to BOEM, the pace and number of offshore wind projects in development in our region pose challenges for thorough analysis of potential impacts, informed public input, and adopting lessons learned from each project. As you are well aware, more than 25 offshore wind energy projects along the east coast are in various stages of planning and environmental review. Consulting and coordinating on these projects are already taxing available resources in the fishing, fishery management, and fishery science communities, and we expect within BOEM as well. We have found it challenging to effectively engage in this process at the current pace while fulfilling our existing fisheries management missions. We know many other stakeholders have also found it challenging to track recent developments and provide input into the process. |
| BOEM-2022-0025-DRAFT-0165-639 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | NEPA/Public Involvement Process | The PDF “posters” in the online virtual page provide a useful summary of the project in a more easily accessible format than the 455-page COP (not including appendices). Posters on commercial and recreational fishing should also have been provided to allow the public to more easily understand and provide comments on the potential impacts of the project on commercial and recreational fisheries, as well as to comment on potential alternatives to reduce negative impacts to fisheries. As stated in multiple comment letters to BOEM in 2021, we recommend consistency in the information provided in these posters across projects and we recommend that posters on both commercial and recreational fishing be provided for all projects. |
| BOEM-2022-0025-DRAFT-0176-676 | Michael Heck | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0179-682 | Kathleen Campanella | Individual | None | NEPA/Public Involvement Process | I attended the July 7th Zoom session yesterday. My family and I have grave concerns about the negative lasting impact this project will have on our pristine beautiful coastline. During the questions and answer session, it became very clear, that truth, transparency, compromise, and concern for Delaware families (who have been here and will be here for generations,) have all taken a back seat to the profit margins of these two companies.<br>Furthermore, it seems that a minority of the residents are aware of the project details. It feels like there is a distinct effort to let this project slip by unnoticed if possible. At the very least, each homeowner has a right to hear the full presentation, ask questions, and then make formal comments. What exactly has been done to make sure everyone has been informed adequately about the project? |
| BOEM-2022-0025-DRAFT-0182-691 | William Truitt | Non-governmental organization | Cotton Patch Hills Association, Inc. | NEPA/Public Involvement Process | BOEM'S 30-DAY COMMENT PERIOD IS WOEFULLY INADEQUATE FOR RECEIVING MEANINGFUL EIS SCOPING COMMENTS.<br>Accordingly, the Cotton Patch Residents respectfully request that a minimurn of an additional ninety (90) days be provided to subrnit comments before the EIS process is initiated. This should allow sufficient time (i.e., 30 days) for BOEM to fully respond to a detailed Freedom of Information Act ("FOIA") request submitted by the undersigned on behalf of the Cotton Patch Residents on Juty 6, 2022, and allow the Cotton Patch Residents a fair and reasonable opportunity to provide additional comrnents on the requested records that underlie the lirnited landfall alternatives presented in the COP. The July 6 FOIA request is attached hereto as Attachment A. |
| BOEM-2022-0025-DRAFT-0183-696 | John Campanella | Individual | None | NEPA/Public Involvement Process | My family and I have grave concerns about the negative lasting impact this project will have on our pristine beautiful coastline. During the questions and answer session, it became very clear, that truth, transparency, compromise, and concern for Delaware families (who have been here and will be here for generations,) have all taken a back seat to the profit margins of these two companies. Furthermore, it seems that a minority of the residents are aware of the project details. It feels like there is a distinct effort to let this project slip by unnoticed if possible. At the very least, each homeowner has a right to hear the full presentation, ask questions, and then make formal comments. What exactly has been done to make sure everyone has been informed adequately about the project? |
| BOEM-2022-0025-DRAFT-0184-697 | Jennifer Holmes | State agency | Delaware Department of Natural Resources and Environmental Control | NEPA/Public Involvement Process | DNREC submits the enclosed comments to support BOEM’s scoping and environmental review process of the Proposed Action, pursuant to the National Environmental Policy Act (NEPA). The comments highlight coastal uses and resources that may occur in the project area and reasonable alternatives that should be evaluated as part of the Proposed Action, in addition to considerations ensuring the needs of affected stakeholders in Delaware are met. The comments are organized in accordance with the Request for Identification of Potential Alternatives, Information, and Analyses Relevant to the Proposed Action section of the NOI. Although some requested information is relevant or applicable across sections, attempts were made to provide the information in the most suitable location. |
| BOEM-2022-0025-DRAFT-0191-723 | Jason Walsh | Non-governmental organization | Bluegreen Alliance | NEPA/Public Involvement Process | To achieve all of this in preparation of the EIS for the US Wind COP, and in regards to all offshore wind project development off U.S. shores, we appreciate your attention in analyzing the following matters: Environmental Impacts To comply with state and federal policies and achieve all necessary permits, all offshore wind energy must be developed in an environmentally responsible manner that avoids, minimizes and mitigates impacts to ocean wildlife and habitat and traditional ocean uses, meaningfully engages stakeholders from the start, and uses the best available science and data to ensure science-based and stakeholder-informed decision making. This includes analysis of cumulative impacts and adaptive management strategies, obtaining all necessary and relevant data, and requires BOEM to identify all methodologies, and indicate when information is incomplete or unavailable, acknowledge scientific disagreement and data gaps, and evaluate intermediate adverse impacts based on approaches or methods generally accepted in the scientific community. Avoiding sensitive habitat areas, requiring strong measures to protect wildlife throughout each state of the development process, and comprehensive monitoring of wildlife and habitat before, during, and after construction, are all essential for the responsible development of offshore wind energy. |
| BOEM-2022-0025-DRAFT-0193-730 | Anonymous Anonymous 17 | Individual | None | NEPA/Public Involvement Process | Where is the button to browse comments that have been submitted to this docket? The text says that this is available on this docket. But it is not. But it seems that BOEM has decided to hide all the comments. Why would BOEM do that?<br>It certainly does not enhance the public's ability to understand the issues and perspectives at work here and detracts from the transparency of the process. The text at regulations.gov says: "Posted Comments After submission, your comment will be processed by the agency and posted to Regulations.gov. At times, an agency may choose not to post a submitted comment. Reasons for not posting the comment can include: The comment is part of a mass submission campaign or is a duplicate; The comment is incomplete; The comment is not related to the regulation; The comment has been identified as spam; The comment contains Personally Identifiable Information (PII) data; The comment contains profanity or other inappropriate language; and The submitter requested the comment not be posted." |
| BOEM-2022-0025-DRAFT-0195-736 | George Krusen | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only<br>30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should<br>be provided. |
| BOEM-2022-0025-DRAFT-0199-747 | Susan Brennan | Individual | None | NEPA/Public Involvement Process | 7. As a member of the Fenwick Island Environmental Committee, obtaining hundreds of pages of documents relating to this project to review, research and respond in 30 days, with 2 Federal holidays in that period does not seem very fair to stakeholders. |
| BOEM-2022-0025-DRAFT-0202-756 | Thomas Brennan | Individual | None | NEPA/Public Involvement Process | I am also concerned that we are having this conversation now instead of much earlier in the leasing and permitting process. This seems illogical to me. I fail to understand why, an EIS is being created now and not at the inception of the project. |
| BOEM-2022-0025-DRAFT-0205-779 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | NEPA/Public Involvement Process | We note that US Wind’s COP is lacking information about certain natural resources, which somewhat limits our ability to comment on these issues during the scoping period. Notably, Appendix D4 of the COP, “Benthic Resources: Lease Area and Offshore Export Cable Corridors Benthic Report,” Appendix K5, “Navigation and Military Activities: Cable Burial Risk Assessment”, Appendix B “Sediment Transport Models”, as well as Appendix A, “Geophysical and Geotechnical Reports: Lease Area and Offshore Export Cable Corridors Survey” are currently missing. US Wind must make this information publicly available in order to facilitate a full and fair discussion of impacts. |
| BOEM-2022-0025-DRAFT-0206-800 | Brooks Gearhart | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0208-806 | Catherine Gearhart | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
|---|---|---|---|---|---|
| BOEM-2022-0025-DRAFT-0209-811 | David Gearhart | Individual | None | NEPA/Public Involvement Process | 7. Given the voluminous size (thousands of pages) of the COP and its appendices, allowing the public only 30 days to review and comment on the COP is unrealistic. A comment period of at least 90 days should be provided. |
| BOEM-2022-0025-DRAFT-0212-818 | Amy Kyle | Individual | None | NEPA/Public Involvement Process | Though there are many volumes for the project, important information seems to be missing and key questions have not been addressed. The environmental impact statement by the Department of Interior will need to address these limitations and weaknesses.<br>The work related to the wind energy program in the mid-Atlantic overall seems to favor length over clarity, and it would be great if this could be changed. The release of thousands of pages of information for the public to review in 30 days is not consistent with the promise for a transparent and scientifically credible process. |
| BOEM-2022-0025-EMAIL-275-837 | Michael Pentony | Federal agency | NMFS | NEPA/Public Involvement Process | As noted above, we expect the COP will be updated to include detailed habitat information. When a COP is updated during the regulatory process, it is important that you notify cooperating agencies immediately with clear explanations of any modifications made to the COP. We expect to provide additional comments and technical assistance upon review of any updated information, including potential alternatives to avoid, minimize, and mitigate impacts of the project on marine and estuarine resources. Delays in providing information and the resulting need for repeated engagement is an ongoing issue that is putting a substantial strain on our ability to review these projects as efficiently as possible and offer input in a timely manner. Updates to the COP that occur after initiation of consultations with our agency may affect our consultation timelines. Should unexpected revisions to the project occur, coordination with us as soon as possible on both the COP revisions and timeline modifications is critical to help prevent inefficiencies and confusion that can result from multiple reviews and result in delays that may affect project timelines and consultation schedules. This is particularly important given that BOEM is planning to expedite the review of the COP through a two-year timeline as a FAST-41 project. |
| BOEM-2022-0025-EMAIL-275-838 | Michael Pentony | Federal agency | NMFS | NEPA/Public Involvement Process | As we have noted in the past, our ability to meet the consultation milestone dates is contingent upon us making the determination that we have received complete and adequate consultation documents (Biological Assessment (BA) and Essential Fish Habitat (EFH) assessment) that contain all necessary information to consult on the project. The COP addresses full build out of the lease through multiple projects (MarWin, Momentum Wind, and additional unnamed development(s)); in order for the ESA and EFH consultations to consider the full scope of the potential COP approval, it is essential that the BA and EFH assessment adequately assess effects of the full scope of BOEM's proposed action. This timeline is also contingent upon receipt of an initial MMPA Letter of Authorization (LOA) application by the agreed upon date, currently **August 3, 2022**. Our Biological Opinion under the ESA is comprehensive and must consider all proposed actions associated with the project, including the proposed issuance of an LOA. As a result, any delays to the MMPA timeline are likely to have cascading effects on the overall project schedule. |
| BOEM-2022-0025-EMAIL-275-845 | Michael Pentony | Federal agency | NMFS | NEPA/Public Involvement Process | Considerations for Analysis Development<br>The "Affected Environment" section of the EIS should cover a sufficient geographic area to fully examine the direct and indirect impacts of the proposed project and support an analysis of the cumulative effects. For each impact producing factor (IPF), it is important that the geographic area encompass all relevant project related activities, including the lease area, cable corridors, landing sites, vessel transit routes, and the use of ports outside of the immediate project area. This analysis should also include any necessary landside facilities and the staging locations of materials to be used in construction. However, the geographic analysis area should not be defined so broadly as to dilute the magnitude of the direct and indirect impacts relative to and caused by the specific IPF for each action alternative. |
| BOEM-2022-0025-EMAIL-275-855 | Michael Pentony | Federal agency | NMFS | NEPA/Public Involvement Process | The section describing the "Affected Environment" for protected species should include information on the seasonal abundance, distribution, and density of marine mammals, sea turtles, ESA-listed marine fish, anticipated habitat uses (e.g., foraging, migrating), threats, and the habitats and prey these species depend on throughout the area that may be directly or indirectly impacted by the project. |
| BOEM-2022-0025-EMAIL-275-857 | Michael Pentony | Federal agency | NMFS | NEPA/Public Involvement Process | The significance criteria definitions should identify the level of impacts from the project (e.g., negligible, minor, moderate, major); the direction (beneficial or negative); and where applicable, the duration of impacts. Importantly, the significance criteria should not embed terms defined by other statutes (e.g., the definition of minor should not refer to the MMPA definition of "level A harassment") or apply other statutory definitions to the impact criteria used for NEPA purposes. Rather, these definitions should be written in a way that it is clear to a reader how these impact determinations consider the spectrum of effects to individual animals (e.g., temporary behavioral disturbance, injury). You should use definitions that are appropriate for the resource being considered (e.g., benthic habitat vs. marine mammals).<br>For example, impact conclusion specificity between species groups (e.g., low frequency vs. mid frequency cetaceans) of marine mammals and sea turtles should be incorporated into the EIS. A broad grouping approach (e.g., all marine mammals) creates uncertainty and gaps in the analysis and does not fully represent the variability of impacts amongst different taxa. As species within these taxa have different life histories, biology, hearing capabilities, behavioral and habitat use patterns, distribution, etc., project effects may not have the same degree of impact across all species. Thus, the impact conclusions (e.g., minor, moderate) are clearer and better supported if the document describes the degree of impacts to each species (e.g., green sea turtle vs. hawksbill) or groups of species (e.g., mysticetes, odontocetes, pinnipeds). Additionally, for some marine mammal species (e.g., harbor porpoise), data from European wind farms can be used to support each determination. This approach also allows the analysis to better identify the ability of those species or groups to compensate when exposed to stressors and better identify the benefit from mitigation and monitoring measures. This approach would ensure the analysis reduces uncertainty and reflects the best available scientific information. Also, wherever possible, we encourage you to identify effects to individuals (e.g., injury, behavioral disturbance, disrupted foraging), as well as impacts at the population level. |
| BOEM-2022-0025-EMAIL-275-858 | Michael Pentony | Federal agency | NMFS | NEPA/Public Involvement Process | As you know, we worked with you on the South Fork EIS to develop significance criteria definitions for impacts on NOAA trust resources (i.e. marine mammals, benthic habitat, EFH, finfish and invertebrates). That collaborative work should be carried forward for this and future NEPA documents. As we have stated in the past and discuss further below, to the extent that any project impact conclusions are based on the inclusion of mitigation measures that BOEM intends to make mandatory, those measures must be clearly defined (in size, scope, and time) and include language which indicates that the measure is considered part of the proposed action and will be required as a condition of COP approval. |
| BOEM-2022-0025-EMAIL-275-860 | Michael Pentony | Federal agency | NMFS | NEPA/Public Involvement Process | The environmental consequences section of the EIS should also consider all of the individual, direct, and indirect effects of the project, including those impacts that may occur offsite as a result of the proposed project, such as construction of landside facilities necessary to construct and support operations of the US Wind project. Impact-producing factors (IPFs) from each phase of development should be considered, including site exploration, construction, operation and maintenance, and decommissioning. |
| BOEM-2022-0025-EMAIL-275-861 | Michael Pentony | Federal agency | NMFS | NEPA/Public Involvement Process | All activities included in construction of the project should be considered, including, but not limited to:<br>● deposition of fill material;<br>● dredging;<br>● water withdrawals;<br>● seafloor preparation, including removal and/or relocation of boulders, UXOs, and other obstructions;<br>● pile driving;<br>● increased vessel traffic;<br>● anchoring; and<br>● transmission cable installation.<br>All relevant IPFs affecting marine resources should be evaluated, including, but not limited to:<br>● elevated noise levels from both construction and WTG operation;<br>● increased vessel traffic;<br>● turbidity and sedimentation;<br>● electromagnetic fields (EMF);<br>● habitat alteration; and<br>● presence of structures (WTGs, substations, cables, and scour and cable protection). |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
|---|---|---|---|---|---|
| BOEM-2022-0025-EMAIL-275-862 | Michael Pentony | Federal agency | NMFS | NEPA/Public Involvement Process | The EIS should use standard IPFs identified in BOEM guidance document (available at: https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/Impact-Producing-Factors-in-the-Offshore-Wind-Cumulative-Impacts-Scenario-on-the-South-Atlantic.pdf)instead of new or alternative IPF elements. For example, the COP does not evaluate fishery impacts from the standard the presence of structures IPF. Instead, the COP discusses the impacts of "use conflicts," which is only one of several potential impacts associated with the presence of structures. |
| BOEM-2022-0025-EMAIL-275-866 | Michael Pentony | Federal agency | NMFS | NEPA/Public Involvement Process | We recommend the following temporal classifications: (1) short-term (less than 2 years); ( 2) long-term (2 years to < life of the project); and (3) permanent (life of the project). The time of year that construction activities occur is a crucial factor in evaluating potential biological, economic, and social impacts of the project and should be explicitly considered when evaluating impacts. |
| BOEM-2022-0025-EMAIL-275-880 | Michael Pentony | Federal agency | NMFS | NEPA/Public Involvement Process | As such, the document body must contain the following item as well as the bulleted items set forth below: the purpose and need of NMFS' action, a clear description of NMFS' roles and responsibilities as both a cooperating and adopting agency (language we previously provided to BOEM for the South Fork Draft EIS); a range of alternatives which incorporate a description of NMFS' action, to include the no action alternative.<br>● The other agency's EIS (or portion thereof) fully covers the scope of our proposed action and alternatives and environmental impacts;<br>● An adequate evaluation of the direct, indirect, and cumulative impacts on marine mammals and the marine environment, including species listed under the ESA;<br>● An adequate discussion of the MMPA authorization process necessary to support implementation of the action;<br>● A reasonable range and evaluation of alternatives to the proposed action, including a no action alternative and alternatives to mitigate adverse effects to marine mammals, including species listed under the ESA;<br>● There is a thorough description of the affected environment including the status of all marine mammals species likely to be affected;<br>● There is a thorough description of the environmental impacts of the proposed action and alternatives, including direct, indirect, and cumulative impacts on marine mammals and projected estimate of incidental take;<br>● Identification and evaluation of reasonable mitigation measures to avoid or minimize adverse impacts to marine mammals, including species listed under the ESA; and<br>● The listing of agencies consulted. |
| BOEM-2022-0025-TRANS-1-2 | Kim Quillin | Non-governmental organization | Salisbury University, Henson School of Science and Technology | NEPA/Public Involvement Process | Salisbury University is not currently recognized as a stakeholder in Appendix Two. You can add us. |
| BOEM-2022-0025-TRANS-32-114 | William Truitt | Individual | None | NEPA/Public Involvement Process | The Federal Register notice provided a link to the BOEM website for the US Wind project. I clicked on that link and found that the Construction and Operation plan has two volumes consisting of more than 400 pages, plus more than 15 technical appendices. The US Wind representative tonight stated that overall, the COP consists of thousands of pages. How can BOEM realistically expect the public to review, digest and comment on thousands of pages of very technical information in 30 days? I submit that anything less than 90 days is essentially a cram down for the project without giving the public an adequate time to comment. And I'm not aware of any limitation that BOEM has to extend the comment period. I don't believe there's anything in statute, regulations or even guidance that says it has to be so limited on a complex project like this. |
| BOEM-2022-0025-TRANS-40-141 | Bill Berry | Individual | None | NEPA/Public Involvement Process | Are there impacts considered positive or negative over the long term life of the wind farm operation? |
| BOEM-2022-0025-DRAFT-0023-255 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Noise | Operating noise increases with the size of the turbine so the 18 MW turbines will be even louder. With planned spacing for the projects set on a 0.9 by 1.2 mile grid overlapping noise shadows will be at unacceptable levels in the entire lease area. To complete the COP and begin the EIS US Wind needs to measure the underwater sound levels of 18 MW turbines and determine a mitigation strategy to meet NOAA level B harassment levels. |
| BOEM-2022-0025-DRAFT-0066-343 | Calhoun Bond | Non-governmental organization | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0067-348 | Janet Webb | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0076-369 | Mark Newcomer | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0080-377 | fred levy | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0082-383 | Danny Smith | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0083-388 | Robert Kowalski | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0084-393 | Andrew Levy | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0088-405 | Brett Gauntlett | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0093-417 | Kirk Simme | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0095-423 | David Dempsey | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0097-430 | James Roberts | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0099-436 | Mary Simme | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0101-442 | MICHAEL PINKERT | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0103-449 | Beverly Newborn | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0105-455 | Matthew Morris | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0108-467 | Betsy Brino | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0113-482 | Doug Brinkley | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
|---|---|---|---|---|---|
| BOEM-2022-0025-DRAFT-0114-487 | Julia Deves | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0115-492 | Aaron Deves | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0116-497 | Kamran Givpoor | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0119-506 | Anonymous Anonymous 13 | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0120-511 | James Bond | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0125-522 | Behnaz Yalda | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0126-527 | Penn Wyrough | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0132-540 | John Harman | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0133-546 | Donna Fisher | Individual | None | Noise | The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism, and recreation. |
| BOEM-2022-0025-DRAFT-0138-557 | Paul Taltavull | Individual | None | Noise | The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism, and recreation. |
| BOEM-2022-0025-DRAFT-0140-564 | Anonymous Anonymous 15 | Individual | None | Noise | The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism, and recreation. |
| BOEM-2022-0025-DRAFT-0142-571 | Julie Grohovsky | Individual | None | Noise | The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism, and recreation. |
| BOEM-2022-0025-DRAFT-0145-581 | Sandy A | Individual | None | Noise | The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism, and recreation. |
| BOEM-2022-0025-DRAFT-0147-589 | E. B. Cohen | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0149-595 | Charles Licameli | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0155-607 | Andrew Finley | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0156-612 | Joanne Finley | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0157-617 | Anonymous Anonymous 16 | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0158-623 | Piper Bond | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0162-628 | Martin Sonnenberg | Individual | None | Noise | What effect will subterranean lines have on sea life and to human exposure? What structures need to be built or is the case all underground? What impact will construction have on residents? Will noise be associated? Ground vibration? Is there a moratorium on drilling and driving of support structures? |
| BOEM-2022-0025-DRAFT-0168-657 | Karen Auwaerter | Individual | None | Noise | Noise - Many participants in the July 7 presentation raised concerns about the noise and “whine” generated from the turbines. Questions as to the noise impact of these turbines on beach communities and the environment in general were essentially unanswered. What will the noise impact of these turbines be? |
| BOEM-2022-0025-DRAFT-0170-662 | Lou Manzo | Individual | None | Noise | Noise - Many participants in the July 7 presentation raised concerns about the noise and “whine” generated from the turbines. Questions as to the noise impact of these turbines on beach communities and the environment in general were essentially unanswered. What will the noise impact of these turbines be? |
| BOEM-2022-0025-DRAFT-0176-675 | Michael Heck | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0179-686 | Kathleen Campanella | Individual | None | Noise | Noise: Many participants in the July 7 presentation raised concerns about the noise and “whine” generated from the turbines. Questions as to the noise impact of these turbines on beach communities and the environment in general were essentially unanswered. What will the noise impact of these turbines be? |
| BOEM-2022-0025-DRAFT-0182-695 | William Truitt | Non-governmental organization | Cotton Patch Hills Association, Inc. | Noise | THE COP FAILS TO SUFFICIENTLY QUANTIFY CONSTRUCTION AND OPERATONAL NOISE IMPACTS ON ANIMALS AND HUMANS |
| BOEM-2022-0025-DRAFT-0186-710 | Sarah Albertson | Individual | None | Noise | Noise - Many participants in the July 7 presentation raised concerns about the noise and “whine” generated from the turbines. Questions as to the noise impact of these turbines on beach communities and the environment in general were essentially unanswered. What will the noise impact of these turbines be? |
| BOEM-2022-0025-DRAFT-0187-715 | John Donofrio | Individual | None | Noise | Noise: Many participants in the July 7 presentation raised concerns about the noise and “whine” generated from the turbines. Questions as to the noise impact of these turbines on beach communities and the environment in general were essentially unanswered. What will the noise impact of these turbines be? |
| BOEM-2022-0025-DRAFT-0192-728 | David Dempsey | Individual | None | Noise | Noise. The BOEM should also ensure that the turbines will not be heard from the shore |
| BOEM-2022-0025-DRAFT-0195-735 | George Krusen | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0199-743 | Susan Brennan | Individual | None | Noise | 2. I am concerned about the sound/vibrations the turbines will make when operational relative to the effects on sea life.<br>3. I am concerned about the drilling that is proposed to install the equipment. |
| BOEM-2022-0025-DRAFT-0204-768 | Stephani Ballard Wagner | Individual | None | Noise | • Similarly, and relevant to the socioeconomic category, no data is provided as to what noise levels may be audible to those persons living or working within various radii of the turbines. |
| BOEM-2022-0025-DRAFT-0205-775 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Noise | Noise: Quieter foundation technologies such as gravity-based or suction bucket (or “caisson”) foundations eliminate the need for pile driving and thus one of the most impactful offshore wind activities on whales and other marine life. We urge the use of quieter foundations during offshore wind energy project installation and stress the importance of providing full consideration, when feasible, to selecting these options as the preferred alternative. If pile driving must occur, effective noise reduction and attenuation technologies are commercially available8 and near real-time monitoring technologies that can be used to trigger mitigation measures are being tested or are already being used by other sectors.9 Pending further study, we also recommend the use of direct drive turbines as opposed to turbines with a gear box, as direct drive turbines may emit lower noise levels10 and reduce the risk of behavioral disturbance or habitat displacement of North Atlantic right whales and other species during the operation phase of development.11 |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
|---|---|---|---|---|---|
| BOEM-2022-0025-DRAFT-0206-799 | Brooks Gearhart | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0208-805 | Catherine Gearhart | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0209-810 | David Gearhart | Individual | None | Noise | 6. The frequency and magnitude of noise emissions resulting from the construction of the offshore and onshore export cables should be assessed in the EIS, including the impact of the noise on residential homes, tourism and recreation. |
| BOEM-2022-0025-DRAFT-0212-824 | Amy Kyle | Individual | None | Noise | Noise is a significant concern for marine mammals that has not been adequately assessed nor addressed to date. Extensive shipping and boat traffic can create an existing level of background noise, as has been demonstrated in European studies. This would be likely to occur along the shipping channels related to Delaware Bay, which are extensively used. Construction and operation activities will add additional sounds and noise. 3<br>Adding additional noise sources directly adjacent to these existing sources may be detrimental and has not been adequately investigated. More research is needed to fully understand the significance of the multiple sources of sounds that are combined in high use areas such as the Mid Atlantic tracts off Maryland and Delaware. This is required before this project should be authorized. |
| BOEM-2022-0025-TRANS-60-200 | Venkat Subramanian | Individual | None | Noise | Second is the noise level and the visual impact thereof. |
| BOEM-2022-0025-DRAFT-0025-262 | Terry Sterner | Individual | None | Other | Duplicate submittal from 6/23 Public Meeting Testimony |
| BOEM-2022-0025-DRAFT-0026-263 | Mark Ramsay, P.E. | Individual | None | Other | Duplicate submittal from 6/23 Public Meeting Testimony |
| BOEM-2022-0025-DRAFT-0034-274 | Janet Redman | Individual | None | Other | Duplicate submittal to -0033 |
| BOEM-2022-0025-DRAFT-0054-323 | Anonymous Anonymous 5 | Individual | None | Other | Comment presented as "test comment" |
| BOEM-2022-0025-DRAFT-0055-324 | Anonymous Anonymous 6 | Individual | None | Other | Comment presented as "test comment 2" |
| BOEM-2022-0025-DRAFT-0172-667 | Rick Meehan | Local agency | Town of Ocean City Maryland | Other | Duplicate from 6/27/2022 public meeting, written testimony |
| BOEM-2022-0025-EMAIL-275-881 | Michael Pentony | Federal agency | NMFS | Other | We also see a unique opportunity for BOEM to require offshore wind developers construct vessels incorporating vessel quieting technology. Propeller cavitation is the primary source of chronic noise from vessels in the ocean environment. |
| BOEM-2022-0025-TRANS-11-35 | Jonathan Phillips | Individual | None | Other | In the interest of brevity, I will not read the balance of the statement that Ocean City has on its governmental website, but it would incorporate those comments herein. |
| BOEM-2022-0025-TRANS-24-85 | Henry Farkas | Individual | None | Other | Wind is not the only possible source of inexhaustible energy from the ocean, by the way. There's also the energy from waves, from tides, from currents, I'm kind of wondering if BOEM, which purports to be doing things with energy sources from the ocean, is doing anything from those things. And I recommend that they do some studies to try and utilize more than just the wind, because the wind sometimes stops, but the currents don't stop. The tides come and go, but they're pretty dependable, things like that. |
| BOEM-2022-0025-TRANS-29-105 | Reba Carruth | Individual | None | Other | I would also like to see very quickly a plan with the Department of Energy and the other Chesapeake Bay watershed states, a plan for collective action for domestic wind supply chain, which really speaks to the storage of wind. Just like solar energy can be stored, wind energy can be stored. And I think this would definitely benefit the residents of Maryland as well as the rest of the Chesapeake region. |
| BOEM-2022-0025-TRANS-35-122 | Kathy Phillips | Individual | None | Other | Regarding energy delivery and the underground cables, I have heard a lot of concern by residents in our coastal towns about the buried cables. I think a lot of our residents are not aware of how many buried cables are already coming ashore under their beaches, under their homes, their streets and our coastal bays. It might help if BOEM and US Wind were to provide maps of all the buried cables. For instance, communications, energy like natural gas, energy like electricity. They could provide maps showing where all these buried cables are already for better public awareness. For instance, the town of Ocean City has a large network of buried pipelines carrying natural gas pipelines that are buried under the streets next to homes, schools, businesses and are running underneath our coastal bays. In fact, one right next to the Route 50 bridge into Ocean City. |
| BOEM-2022-0025-DRAFT-0023-252 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Planned Activities Scenario/Cumulative Impacts | Cumulative impacts are missing from the COP<br>The National Environmental Policy Act (NEPA) requires cumulative impacts be considered in developing an EIS. The COP ignores the neighboring lease off the Delaware Coast leased by developer Orsted. It will include up to 200 turbines, or 2.2 GW of offshore wind comprised of 966 MW from Skipjack 1 and 2 approved by the Maryland PSC, and the 1.2 GW Garden State project working through approvals in New Jersey. Orsted is considering the same sites to bring power ashore and the same routes for onshore transmission lines basically doubling impacts from the US Wind project. These cumulative impacts need to be added to the COP before the EIS review begins. |
| BOEM-2022-0025-DRAFT-0165-651 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Planned Activities Scenario/Cumulative Impacts | The EIS should acknowledge both the individual project's potential to materially affect oceanographic and hydrodynamic conditions based on ongoing research efforts and the project's contribution to cumulative effects from development of several wind projects on a regional scale. The EIS should utilize findings from ongoing research, including research funded by BOEM, in its impact assessment to understand how wind energy facilities may affect local and regional physical oceanographic processes.<br>Secondary cascading ecosystem effects should also be evaluated as community composition could change within and beyond the project area. For example, the addition of structured habitat may attract bivalve predators such as sea stars and moon snails, which could have negative impacts on shellfish species (e.g., sea scallops) and could result in cascading ecological impacts. In addition, if construction of this project negatively impacts important prey species, this could have cascading impacts on marine food webs. |
| BOEM-2022-0025-DRAFT-0165-652 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Planned Activities Scenario/Cumulative Impacts | The EIS must include a meaningful cumulative impacts assessment. We are very concerned about the cumulative impacts of the many planned offshore wind projects off our coast on fisheries, fishery species, and marine habitats. Each individual wind project cannot be considered in isolation. We supported the criteria used in the Vineyard Wind 1 and South Fork EIS for defining the scope of reasonably foreseeable future wind development; however, that scope should be expanded to include additional areas which have since been leased offshore of New York/New Jersey and the Carolinas, as well as Call Area development in the Central Atlantic. The cumulative effects of adjacent wind projects should be thoroughly evaluated.<br>As stated in previous comment letters to BOEM, we recommend the creation of information products to show the planned locations of export cables for all wind leases (e.g., through the Northeast and Mid-Atlantic Ocean Data Portals) to help stakeholders better understand potential cumulative impacts. We recognize that final precise cable routes have not been determined for most projects and this should be noted in the information products. Earlier dissemination of draft proposals via these platforms would promote better understanding of these projects in relation to each other and to other activities.<br>Cumulative impacts and risks should be evaluated for species that are widely distributed along the coast. Species such as bluefish, flounders, and others that migrate along the coast could be affected by multiple offshore wind projects, as well as other types of coastal development, at both the individual and population level. Climate change is also an essential consideration in the cumulative effects analysis as the distributions and abundance of many species are changing (some increasing, some decreasing) due to climate change and other factors. The EIS should acknowledge that impacts from the construction of wind projects will occur in this context. |

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| BOEM-2022-0025-DRAFT-0178-681 | William J. Cook | Local agency | Cape May County, NJ via Cultural Heritage Partners | Planned Activities Scenario/Cumulative Impacts | 3. Cumulative Impacts<br>Multiple wind farms are in development off the coasts of New Jersey and adjacent states. These offshore wind projects will have both separate and cumulative adverse visual impacts upon historic properties, sites, and districts listed or eligible for listing in the National Register of Historic Places.<br>In specifically requiring cumulative impacts analyses, NEPA and NHPA recognizes the significant effect that projects can have on the surrounding landscape beyond the scope of a single development. This Project, and how it is evaluated and permitted, will set a precedent for upcoming projects in the area and along the entire Atlantic Coast; therefore, it is essential to apply consistent criteria to this project and subsequent future sites. Due to the historic integrity of historic properties within the Project Area and Area of Potential Effect, BOEM must establish and implement best practices. Based on the omissions described above, the COP should be amended to reflect—and<br>the DEIS should include—a complete cumulative assessment of all impacts to historic and cultural properties and include additional cumulative visual simulations for Cape May County's historic properties. |
| BOEM-2022-0025-DRAFT-0204-764 | Stephani Ballard Wagner | Individual | None | Planned Activities Scenario/Cumulative Impacts | • While not directly before BOEM at present, it is known that Orsted/Skipjack plans to shortly introduce another major Wind Project, even larger than US Wind's, which will directly face the Delaware beaches and further impact views, visibility and property values. These two projects taken together have the potential to create a wind farm "blight" area along the most valuable and beautiful parts of the Atlantic coastline |
| BOEM-2022-0025-DRAFT-0205-788 | Numerous, consortium of NGOs | Non-governmental organization | National Wildlife Federation, National Audubon Society, All Our Energy, Ocean Conservation Research, et al. | Planned Activities Scenario/Cumulative Impacts | the description within the COP is inadequate as it does not provide an estimate of the number of vessels to be used throughout the project, their average speeds, vessel duration in the area, or peak and average vessel congestion. Instead, the COP only provides information on the type of vessels to be used and other details about their size, capacity, and crew.53 To appropriately avoid, minimize, and mitigate impacts to the NARW and other marine species particularly vulnerable to vessel strikes, BOEM must consider how the estimated frequency and duration of vessels in the Project area will increase collision risk. |
| BOEM-2022-0025-DRAFT-0212-823 | Amy Kyle | Individual | None | Planned Activities Scenario/Cumulative Impacts | Cumulative effects of all the elements of offshore wind development must be considered. 2 All of these concerns are relevant to the Mid-Atlantic nearshore tracts including those in the US Wind area and need careful and scientifically competent assessment. Consideration of improved siting should be part of the consideration.<br>It is challenging to determine the cumulative effect of the leasing since it has not been completed as yet and because leases originally awarded subsequently become proposed for more intensive development than originally promised. The representations made by both BOEM and the turbine companies during the leasing processes appear to be of limited veracity, as the leases have been rearranged and renegotiated as in this case to suit the turbine companies and subsequent plans include a vastly increase the scale of development. This sort of tactic is not consistent with a transparent and scientifically grounded process. Just as US Wind wants to adopt an "envelope" approach to define the maximum extent of what they might want to do in their leased areas, the Department of Interior should be accurately defining and assessing what is the maximum extent of what could be approved in all of their leased areas and considering cumulative effects of this. NEPA requires this, and it is the only approach that makes sense and is credible scientifically. The current approach to assess only the additional cumulative effects of each leased area separately will by design fail to consider the impacts of the projects as a whole. |
| BOEM-2022-0025-EMAIL-275-871 | Michael Pentony | Federal agency | NMFS | Planned Activities Scenario/Cumulative Impacts | The EIS should include a complete analysis of the cumulative impacts of the project. This analysis should describe the effects of the proposed project, which in combination with any past, present, and reasonably foreseeable future actions, may result in cumulative impacts on the ecosystem and human environment. As we have noted in recent comments to BOEM: the cumulative impacts analysis is intended to be separate and distinct from predicting the effects of the "no action" alternative, and the two analyses should remain separate and distinct. It is appropriate to incorporate the effects of past and ongoing actions, including the approved OSW Vineyard Wind and South Fork Wind projects, into the baseline condition for each resource (which can be incorporated by reference in the cumulative impacts analysis) for which to evaluate the effect of no action and for use in comparing the effects of the action alternatives against no action. However, reasonably foreseeable future actions - including future planned development of lease areas - should be separately and distinctly evaluated in the cumulative impacts analysis. This analysis should include a broad view of all reasonably foreseeable activities, including but not limited to, energy infrastructure (including future wind energy projects), sand mining, aquaculture, vessel activity, fisheries management actions, disposal sites, and other development projects. It is critical to evaluate the cumulative effects of offshore wind development. This includes reasonably foreseeable future offshore wind development planned projects such as those subject to approved leases and those in the site assessment phase. The cumulative effects analysis should consider the incremental effects of the action when added to other past, present, and reasonably foreseeable future actions. Specifically, the cumulative effects analysis should consider all 16 COPs BOEM recently announced it plans to process by 2025. In addition, leases have been issued from the recent New York Bight auction; consideration of the impacts from anticipated projects in those Wind Energy Areas as well as in other regional planning areas is warranted. |
| BOEM-2022-0025-EMAIL-275-872 | Michael Pentony | Federal agency | NMFS | Planned Activities Scenario/Cumulative Impacts | The cumulative impacts assessment should include impacts of the US Wind project (turbine scale) and the full build-out/cumulative offshore wind scenario on hydrodynamics, oceanographic, and atmospheric conditions on the marine ecosystem. These potential impacts of offshore wind development are not well known, but large scale energy extraction from the atmosphere and the physical presence of project infrastructure could have a significant impact on currents, primary productivity, and stratification, including particularly the key seasonal feature of this region, the Cold Pool - and, subsequently, the ecology, habitat, and egg/larvae and prey distribution of a number of federally-managed fish species and protected species. We recognize there is uncertainty regarding the scope and scale of impacts that may result from the introduction of new structures into the offshore environment of the U.S. northeast shelf and related energy extraction from the wind turbines; however, it is critical that this issue is thoroughly addressed and that the EIS considers the best available scientific information to support any conclusions regarding these impacts, including ongoing studies on this topic. In particular, the EIS should contain a robust assessment of the potential effects of both the US Wind project and the full build-out scenario on prey resources for North Atlantic right whales and other species. Potential impacts to plankton distribution should be clearly discussed as their distribution, aggregation, and possible abundance may shift, and this could have a significant impact on North Atlantic right whales, along with other large whales and numerous species of planktivorous pelagic fish, as zooplankton are the primary source of prey for many higher trophic level organisms. In addition, consideration of impacts to species recruitment and larval distribution due to changes to ocean stratification and circulatory patterns resulting from the development of wind projects should be discussed in this section. |
| BOEM-2022-0025-EMAIL-275-873 | Michael Pentony | Federal agency | NMFS | Planned Activities Scenario/Cumulative Impacts | The EIS should evaluate, in detail, the cumulative impacts on protected species, habitat, and fisheries resources associated with overlapping construction activity of regional projects, including elevated noise levels, displaced fishing effort, cable routing and burial, and changes in species abundance, among other impacts. US Wind is located relatively close to the Skipjack lease area and potential leases resulting from the Central Atlantic Call Areas. Although it is unlikely for Skipjack and Central Atlantic lease areas to have overlapping construction schedules with US Wind and certain impact factors may not overlap with other regional wind projects, temporally overlapping activities by other regional projects may adversely affect certain activities (migration) or multiple sub-populations of particular species. Specific information related to the timing of the construction activity and the expected number of proposed construction seasons is important, particularly for evaluating cumulative impacts to marine mammals, sea turtles, and spawning and migratory activity of fish and invertebrates. Vessel strikes are a documented threat to a number of protected species including Atlantic sturgeon, sea turtles, and large whales, including critically endangered North Atlantic right whales. The EIS should evaluate, in detail, the cumulative effects of increased vessel traffic during all phases of the project. In addition, an assessment of cumulative impacts of existing and proposed transmission cables should also be considered. Based on the proposed wind development projects in this region, there is the potential for substantial additive impacts associated with the number of required cables. As part of the cumulative effects analysis, measures to minimize the additive impacts should be considered, including the evaluation of designated cable routes and coordination and consolidation with adjacent projects to minimize cumulative impacts. |
| BOEM-2022-0025-EMAIL-277-929 | Stepan Nevshehirlian | Federal agency | EPA | Planned Activities Scenario/Cumulative Impacts | EPA recommends the EIS carefully evaluate the synergistic impacts of this project and activities with other proposed offshore wind facilities and other projects that may also have cumulative effects. The temporal scope of the assessment should specify an adequate time frame both prior to the Project as well as in the reasonably foreseeable future. Interrelated impacts of the projects both offshore and onshore could necessitate considering additional impact reduction measures or mitigation.<br>It is anticipated that Sparrows Point will be utilized as staging facility to receive WTGs and other components and will likely assemble and fabricate components. Impacts associated with port enhancement, construction, or modification of facilities, and/or expanded operations including vessel or land-based traffic should be assessed to the extent possible. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-TRANS-40-140 | Bill Berry | Individual | None | Planned Activities Scenario/Cumulative Impacts | And are we going to be able to look at the changes in the biotic ecosystem from what they are currently to post installation? And I know some studies have been done looking at what's current, but my concern is are we able to somehow look at, I guess, what Brian called the cumulative impacts over time from the operation of these kinds of systems and what the impacts will be to the aquatic biota and the actual ecosystem around those turbines over the long term? |
| BOEM-2022-0025-DRAFT-0020-238 | Elizabeth Reineck | Individual | None | Proposed Action/Project Design Envelope | Logistically, I worry about placing gigantic turbines in the Atlantic Ocean, prone to hurricanes, with seas not nearly as calm as other offshore wind farms in Europe (which as of late have not been able to support energy demands and they are now returning to coal). |
| BOEM-2022-0025-DRAFT-0023-248 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Proposed Action/Project Design Envelope | US Wind states scour protection on inter array and transmission cables will only be used as needed, and estimates that may be only 10% of the time on page 54 of Volume 2. On page 125 of Volume 2 there is a statement the minimum depth of burial of transmission cables could be as small as 3.2'. Transmission cables from the Block Island offshore wind project became exposed several years ago despite burial of 6' or more, and are still exposed including on a recreational beach. Scour protection should be required on all cables.<br>Decommissioning is discussed throughout the document but it is not clear scour protection mats and rocks will be removed. The seabed should be returned to its original state with scour protection removed. Also turbine blades and other turbine components are not recyclable and are currently placed in landfills. Because of the size of the blades they will take up an extraordinary amount of space. US Wind must commit to dispose of turbine blades in Maryland landfills, or obtain approval now from the Delaware Solid Waste Authority. |
| BOEM-2022-0025-DRAFT-0024-261 | Pamela Winston | Individual | None | Proposed Action/Project Design Envelope | US Wind has taken pains to address other potential issues with the project that affect people and the environment, including plans for eventual de-commissioning (fears about the end of the project's life was a complaint raised in prior hearings).<br>I close with an obvious point that bears repeating: Without all of us taking every measure we have to expand clean energy like wind power, and to combat climate change, Ocean City and other coastal locations will not survive at the current rate of sea level rise. We cannot let that happen.<br>Please help Marylanders to do our part in this battle, and move this plan for offshore wind power forward. |
| BOEM-2022-0025-DRAFT-0042-286 | Lena Marceca | Individual | None | Proposed Action/Project Design Envelope | Is it true that the longer this is postponed the more likely we'll get taller turbines offshore? |
| BOEM-2022-0025-DRAFT-0042-287 | Lena Marceca | Individual | None | Proposed Action/Project Design Envelope | How long do the turbines have to be in place before the fossil fuel usage to build and maintain them is compensated for? |
| BOEM-2022-0025-DRAFT-0165-644 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Proposed Action/Project Design Envelope | The EIS should describe the amount and type of scour protection that may be needed for the turbine and offshore substation foundations, as well as the amount of external cable armoring that may be required if sufficient cable burial depth cannot be achieved and at crossings with other cables. Consideration should be given to materials that reduce the potential for interference with existing fisheries in the area. It should be noted that there are different considerations for different fisheries. For example, the commercial fishing industry is concerned about the use of concrete mattresses due to the potential for hanging/snagging mobile gears. Some recreational fishery stakeholders have noted improved fishing opportunities around the scour protection materials used for the Block Island wind farm off Rhode Island and CVOW pilot project off Virginia. |
| BOEM-2022-0025-DRAFT-0165-645 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Proposed Action/Project Design Envelope | Turbine and substation foundations, as well as materials used for scour protection and external cable armoring will create substrates for fouling organisms and create artificial reefs. These artificial reefs are expected to attract certain fishery species (e.g., black sea bass). However, the addition of new structured habitat in this area will replace existing habitat types and could displace other species which prefer soft sediments (e.g., flatfish, bivalves). The EIS should acknowledge that although the artificial reef effect will be beneficial for some species, it will not be universally beneficial for all species. The impacts of such changes should be analyzed. In addition, the EIS should evaluate the extent to which impacts may vary based on the characteristics of the materials used. These materials should mimic natural, nearby habitats where possible. |
| BOEM-2022-0025-DRAFT-0173-668 | James Crawford | Individual | None | Proposed Action/Project Design Envelope | While the majority of area residents agree with the need to combat climate change, this particular project raises several very serious questions:<br>• What is US Wind's actual experience in building wind farms?<br>• What proof points can they present to demonstrate the effectiveness of this technology in reducing reliance on fossil fuels for electricity production?<br>• And finally, if the sole beneficiaries of this proposed initiative are Maryland residents, why not plant this 1000-foot wind terminals off the coast off the coast of Ocean City, as originally planned? |
| BOEM-2022-0025-DRAFT-0175-671 | R. Stephen Amato | Individual | None | Proposed Action/Project Design Envelope | Marine life may proliferate around the piles' bases, but this is an incidental return compared to the threat to migratory species, intrusiveness of giant towers over miles of sea, light pollution, scrambled radar signals, diversion of shipping, noise, vibrations, possible frequent intrusion by maintenance helicopters, and changing the community to an industrial shore....<br>Wind farms are expensive, temporary, environmentally intrusive, inconsistent in power provision, a security risk and a poor long- term investment. Electrical power is required on a continuous basis, and wind power is dependent upon environmental variables. The U.S. Energy Information Administration estimates wind turbine power will be available 35-40% of the time. Ørsted gives an estimate of 60% efficiency. Even if this estimate were correct, we would have a 40% shortfall. Security for offshore wind farms is not addressed. The turbines require electronic signals. Hackers could remotely shut down all offshore wind turbines. Physical damage could be inflicted also.<br>In summary, offshore wind farms occupy large areas, are expensive, are not robust, blot the landscape, need a backup energy source, and are vulnerable to hacking or sabotage. There are other green, CO2-free, reliable, more compact, longer lasting sources of power. |
| BOEM-2022-0025-DRAFT-0212-819 | Amy Kyle | Individual | None | Proposed Action/Project Design Envelope | The documents show that the power will be brought onshore in Delaware. The rationale for why these cables should come ashore in Delaware should also be presented. How is the massive infusion of electricity into rural Delaware going to be handled exactly? I don't see where this has been addressed. What are the implications for Delaware, its local communities, and its coastal environment? Is anybody doing any planning on this or are you going to bring the power into the grid and see what happens? |
| BOEM-2022-0025-DRAFT-0212-828 | Amy Kyle | Individual | None | Proposed Action/Project Design Envelope | One of the most mysterious aspects of the proposed wind farm is how the power would be brought shore and who would be responsible for the integrity of the power system. The responsibility for this remains unclear and that needs to be changed.<br>A rigorous review of the geotechnical capacity of onshoring proposals should be done BEFRORE areas are leased. It is hard to imagine how the Department of Interior could think it was a good idea to lease offshore tracts without any cogent idea for how the power would be safety brought ashore and usefully connected to the grid. This is integral to achieving the purported purposes of the leasing and yet has been systematically neglected throughout this process.<br>The COP document presented by US Wind is uninformative and actually erroneous in its descriptions of geotechnical hazards and issues and does not even cite the most current data submitted.<br>The COP document does not describe critical issues of scouring potential. This is listed but not seriously discussed. The language in the COP document does not explain that this is a pertinent concern that can compromise wind turbines and the area of the Maryland lease sale may be susceptible to this. The COP document cites earlier studies and not the 2020 results that are presented in the complete document set. The text cites the technical appendices, but these are not necessarily available. |

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| BOEM-2022-0025-DRAFT-0212-829 | Amy Kyle | Individual | None | Proposed Action/Project Design Envelope | Moreover, the COP does not seem to address at all the technological feasibility of the methods that are proposed to be used. Though even here, the text is often quite offhand about possibly using this, that, or some other approach. What the law requires and what the people deserve is a serious discussion of the real issues and concerns, and this is not provided. The document focuses on the potential impacts of the development of the turbines and associated facilities on the environment when a real issue is the potential impact of the geotechnical conditions on the turbines. If scouring takes out the turbines or if the methods used to stick the extensive cabling under the sea floor fail, then what are the implications of that? What is going to be washing up where, and what kinds of hazards to navigation and risks to biota will be created? This seems to be entirely missing. As far as I can tell, no showing of the technological feasibly of the project has been made.<br>One example is the inadequacy of this explanation from the second volume of the submittal:<br>3.3 Operations Scour protection around the WTG and OSS foundations will be monitored and maintained as necessary. This process may suspend finer grain sediment; however, any suspended sediment will settle out of the water column and then redeposit nearby on similar sediment type. The submarine cables will be installed beneath the seabed; therefore, the operation of the submarine cables will not impact the surficial geology. Maintenance of the submarine cables and cable protection would include periodic inspections of the offshore and onshore export cables as well as inter-array cables. Buried submarine cables may be damaged by contact with vessel anchors or fishing trawls dragging over or being dropped upon the cable line (Sharples 2011). Cables can also become exposed due to scour, placing the cable at greater risk of damage (Sharples 2011). In the event of damage occurring to a cable, processes similar to those used during construction and installation would be utilized to expose, repair, and rebury the cable. This activity may cause local sediment displacement and temporarily suspend sediment in the water column. Suspended sediment will settle out of the water column and be redeposited within, or within the vicinity of, the submarine cable corridor.4<br>It is not necessarily that case that cabling installed through directional drilling can be fixed by the same methods used to place it. The cables that came loose at Block Island are still loose and nobody seems to know how to secure them. The risk is higher than what is mentioned here from scouring and other movements of the subsurface associated with storms that are likely to be increasing in frequency and intensity. This should be rectified.<br>Moreover, if the cables are going to be buried to 60 feet as promised by US Wind, would they be susceptible to impacts from fishing gear? Or is the truth that they are not going to be buried and US Wind is just misleading the public? The document suggests that they will be buried in much shallower depths than has been discussed publicly. |
| BOEM-2022-0025-DRAFT-0212-831 | Amy Kyle | Individual | None | Proposed Action/Project Design Envelope | See for example the assessment of the adequacy of the geotechnical work to demonstrate the capability of the project required at 30 CFR 585.626 (a). In the summary tables at the beginning of the first volume of the project information, much of the required information is punted to another venue, indicated here as the FDR/FIR. The FDR is the facility design report, and the FIR has two different definitions in the list of acronyms so it is not clear what it means. These punted elements are critical to the demonstration of the suitability of the information about the site to support the design of the project and the suitability of the design to survive the stressors at the site. These are urgent issues to address and should not be punted out of this application to some other venue. Elements that are deferred in whole or in part include these:<br>• The results of the shallow hazards survey with supporting data<br>• The results of the geological survey with supporting data 9 |
| BOEM-2022-0025-EMAIL-277-907 | Stepan Nevshehirlian | Federal agency | EPA | Proposed Action/Project Design Envelope | The proposed cable route, Offshore Export Cable Corridor 1, would land in the vicinity of 3R's parking lot. An alternative, Offshore Export Cable 2, would initially follow the same common route but then head north to the landfall at Tower Road. We recommend fully explaining the route and any alternatives evaluated for the common cable corridor and the two Export Cable Corridor alternatives. This includes detailing how the cable corridors were selected and identifying resources and constraints. Installation methodologies will also have differing impacts; alternative technologies for installation may also be appropriate. A number of sections of Volume II of the COP indicate that an impact minimization measure will be utilizing the best available technologies for cable installation. EPA recommends that the EIS include an overview of how the proposed cable installation technologies for the Offshore and Onshore Export Cable Corridors avoid potential impacts for each component and location.<br>•Section 3.6.3 of Volume I indicates that the Project includes Horizontal Directional Drilling (HDD) "at up to 3 locations" (between the Atlantic Ocean and 3R's Beach, into Indian River Bay, and from Indian River to the onshore substation.) We recommend clarifying why HDD is limited to these areas and whether it could be used in additional areas to reduce impacts.<br>•The EIS should describe the feasibility of installation technologies, expected impacts, and explain which technology could best be used to avoid impacts to Indian River Bay and other sensitive resources.<br>•We suggest clarifying where jet plowing, HDD, shallow water barge and land-based cable installation equipment or other installation methodologies are expected to be used, including figures that show the expected methods for each route with projected areas for sending and receiving pits, cofferdams, and proposed dredging. The need for dredging should be discussed.<br>•Impacts from cable protection should be fully evaluated and minimized, where possible. The COP states that up to 10 percent of the offshore export cable would require additional protection such as concrete mattresses. EPA recommends evaluating potential options that may avoid adding cable protection or selection of protection that reduces adverse effects. |
| BOEM-2022-0025-EMAIL-277-909 | Stepan Nevshehirlian | Federal agency | EPA | Proposed Action/Project Design Envelope | Onshore Substations<br>The proposed Point of Interconnection (POI) is the Indian River Substation near Millsboro, Delaware. It is anticipated that this substation will be upgraded and expanded to accommodate the new capacity. Two other existing Delmarva Power and Light (DPL) substations are identified that may serve as the POI. However, the information regarding the other two substation locations (Cool Spring and Milford) is limited, and potential impacts associated with the other POI locations are not evaluated in the COP. The Proposed Action also appears to include construction of two new onshore substations adjacent to the existing Indian River Substation. Section 2.6.2 of Volume I indicates that several properties of sufficient size within a half mile of Indian River Substation or adjacent to the additional POIs could also provide additional options for the US Wind substations.<br>•We recommend that potential impacts on habitat, water quality, and communities (i.e., earth and vegetation disturbance, increase in impervious area, noise) for each alternative POI and substation location be clearly compared in the EIS.<br>•Section 2.6.2. notes that US Wind is evaluating both gas-insulated and air-insulated substations. This would create differing scenarios for earth disturbance and greenhouse gas emissions. We recommend that the beneficial and negative environmental impacts of both alternatives be fully evaluated in the Study. |
| BOEM-2022-0025-EMAIL-277-911 | Stepan Nevshehirlian | Federal agency | EPA | Proposed Action/Project Design Envelope | We recommend that potential terrestrial and aquatic resource impacts from onshore components of the project be fully evaluated in the EIS.<br>•Impacts from land-based Onshore Export Cable Corridors are generally not evaluated in the COP. The COP (Section 11.0. Volume II) states that disturbance of terrestrial species and habitat alteration are considered to have already occurred as the cables would be installed in existing ROWs to the extent feasible. However, despite previous disturbance, resource impacts in or adjacent to ROWs may occur. Additional temporary or permanent impacts may be required beyond existing maintained ROWs and resource impacts may extend beyond disturbance areas. Assumptions regarding resources and impact areas should be verified to the extent possible.<br>•Proposed construction of the Interconnection Facilities would include two new substations, expansion of a substation, a construction laydown area, and related infrastructure. Impacts from these activities should be fully assessed. EPA recommends minimization of both permanent and temporary impacts where possible, such as using previously paved and disturbed areas for laydown or stockpiling. |
| BOEM-2022-0025-TRANS-60-201 | Venkat Subramanian | Individual | None | Proposed Action/Project Design Envelope | I also read that it's not consistent in terms of the quantum of how much energy it can put out. So it's going to be intermittent or the effectiveness may not be the same all the time around the year. And so definitely that's one of my concern, because if you put all this time and effort and if the flow or the consistency doesn't come through, then that's not effective either. |
| BOEM-2022-0025-TRANS-60-202 | Venkat Subramanian | Individual | None | Proposed Action/Project Design Envelope | And last but not the least is being offshore the transmission lines, right? The plan for the transmission lines and the impact there are for the environment, whether it is the flora and fauna and particularly the human factors, how does it look for the ice, for the people who live in the area, any other health impact that one should consider, all things that are in my mind. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-TRANS-61-207 | Dolores Greenwich | Individual | None | Proposed Action/Project Design Envelope | What happens if one breaks down or one of those blades break off? They're only 11 miles away from the shore. People are talking about rising winds and rising waters. How are those being these huge towers going to be impacted by that? I think more study needs to be done. |
| BOEM-2022-0025-DRAFT-0143-574 | Linda Sweeney | Individual | None | Purpose and Need | Sea based wind turbines cost 4.8 times as much as land based wind turbines. The Skipjack project consultants stated that the projects were only replacing onshore wind requirements and would not result in a net increase in renewable energy generation. The consultant for Skipjack 1 also calculated the relative emissions savings of onshore versus offshore wind. The conclusion was that onshore saved more emissions as it would be centrally located in the PJM grid and the offshore would be on the edge of the regional grid resulting in greater transmission losses.( Maryland Public Service Commission Docket 9431, item 85 page 159 ) |
| BOEM-2022-0025-DRAFT-0165-636 | Dr. Christopher M. Moore/ Thomas A. Nies | Federal agency | Mid-Atlantic Fishery Management Council and New England Fishery Management Council | Purpose and Need | The purpose and need as defined in the EIS for US Wind should be tied to realistic renewable energy goals, considering state targets, constraints of the onshore power grid, and other considerations. The purpose and need should include a specific MW capacity and should not be overly broad. This is necessary to inform development of alternatives to meet the purpose and need while minimizing negative impacts to the environment and human communities, including impacts to fisheries and fishery species. |
| BOEM-2022-0025-DRAFT-0207-801 | Anonymous Anonymous 19 | Individual | None | Purpose and Need | The full impact on the nation's electrical system must be part of the evaluation to go forward. Transmission lines must be up graded and extended. The ocean is a hostile environment. The unreliable, intermittent nature of wind requires a back up source of power be available and ready to come on line as needed. This means that double the capital expenditure is necessary. Half for the wind power system and half for the backup system. $$$$$$?????? Does this make sense? What is the environmental impact of using double the resources to provide the same level off reliability electrical energy. If it made sense, private enterprise would be building turnkey systems independent of the national grid. Not happening-that is a clue. Reliable, cheap energy is the life blood of civilization. It makes the difference between a 1st world existence and a 3rd world existence. Let market forces make decisions too complex and too important for mere experts and bureaucrats. The magic of free markets is many minds solving their small part of the problem, simultaneously, independently, while balancing out each individual's self interest and biases. |
| BOEM-2022-0025-EMAIL-274-833 | Sam Salustro | Non-governmental organization | Business Network for Offshore Wind | Purpose and Need | In the face of growing global demand, sending clear market signals to attract investment to the U.S. is critical to ensuring U.S. offshore wind deployment goals are met. The previously noted NREL report studied the capacity to fulfill the administration's deployment goal of 30 GW by 2030 and found "additional facilities will be required to achieve a fully domestic offshore wind supply chain."1 This fact takes on increasing importance as the report notes it is "unlikely that international suppliers will have sufficient throughput to support the construction of both European and U.S. offshore wind energy projects." Accordingly, if the U.S. does not develop a robust domestic offshore wind supply chain, surging global demand for offshore wind project components, services, and raw materials could prevent the U.S. from reaching state and federal offshore wind deployment targets. |
| BOEM-2022-0025-TRANS-2-4 | Russell Kovach | Individual | None | Purpose and Need | So I just want to point out that any increase in wind generation necessarily means less reliance on fossil fuels, less of the pollution associated with the burning of natural gas and coal. Maryland currently uses three coal burning power plants, plus there's one in Delaware. The grid is all interconnected, of course, meaning that if we increase our reliance on wind, or rather increasing that reliance on wind, will allow those polluting coal burning power plants to eventually close down, which, of course, can only improve those very things that people come to Worcester County and the rest of the coastline to see Even National Institute of Health says those same airborne pollutants are frequently in the crops that we grow for human consumption as well.. |
| BOEM-2022-0025-DRAFT-0020-237 | Elizabeth Reineck | Individual | None | Recreation and Tourism | The impact to the economy of Ocean City tourism would be devastating. Public information hearings in Ocean City and Delaware have been standing room only, with significant dissent for this project. Furthermore, wind turbines would result in higher energy costs (in an economy already struggling), less reliable power, and adverse impact to local aviary and marine wildlife. |
| BOEM-2022-0025-DRAFT-0024-260 | Pamela Winston | Individual | None | Recreation and Tourism | US Wind, a Maryland-based company, has done everything possible to address local concerns. Despite complaints by some Ocean City property owners, there is in fact evidence that the effects on local tourism may actually be positive, given prior research on turbines off the shore of Block Island, RI (turbines can actually draw tourism). I know it would only increase my enthusiasm about spending time on the Maryland shore, to the extent the turbines are visible at all. |
| BOEM-2022-0025-DRAFT-0033-273 | Janet Redman | Individual | None | Recreation and Tourism | There, an array of 5 wind turbines serves as a tourist attraction and as artificial reefs. Tourists are taken by boat to visit the turbines while fisherman ply the waters around the turbine bases for the new marine life that has appeared. These turbines, placed in 2015, are less than 5 miles off the coast of Block Island. The Block Island community is in the win-win situation of bringing in more tourism dollars while receiving clean, renewable energy. There is no reason that the MD and DE communities could not reap the same benefits if they paid attention to the facts. |
| BOEM-2022-0025-DRAFT-0041-285 | Diane Hanson | Individual | None | Recreation and Tourism | I've seen windmills that are installed in the ocean near Denmark and they are truly beautiful and magnificent to see. I can imagine a whole new industry with tourist boat trips to see the windmills.<br>Building more offshore wind can slow, and one day help stop, the harmful effects of sea level rise and coastal flooding and provide a whole new tourist attraction. |
| BOEM-2022-0025-DRAFT-0046-299 | Victoria Venable | Non-governmental organization | Chesapeake Climate Action Network | Recreation and Tourism | There is also sufficient evidence that offshore wind will increase economic activity throughout<br>the region due to increased tourism. For example, one Goucher poll from fall 2017 surveyed<br>Marylanders to determine how the US offshore wind project would impact their decision to<br>vacation in Ocean City; 75% of respondents said the offshore wind farm would make no<br>difference where they choose to vacation while 12% of respondents said that the presence of a<br>wind farm may encourage visitation out of curiosity and interest.46 |
| BOEM-2022-0025-DRAFT-0066-342 | Calhoun Bond | Non-governmental organization | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0067-347 | Janet Webb | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0076-368 | Mark Newcomer | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0080-376 | fred levy | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0082-382 | Danny Smith | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0083-387 | Robert Kowalski | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0084-392 | Andrew Levy | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0088-404 | Brett Gauntlett | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0093-416 | Kirk Simme | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0095-422 | David Dempsey | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0097-429 | James Roberts | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0099-435 | Mary Simme | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0101-441 | MICHAEL PINKERT | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0102-445 | James Rapp | Individual | DelMarva Birding Weekends | Recreation and Tourism | I assure you bringing wind turbines off the coast will be a boon for both tourism and wildlife…. |
| BOEM-2022-0025-DRAFT-0103-448 | Beverly Newborn | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0105-454 | Matthew Morris | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0108-466 | Betsy Brino | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0110-471 | John Neylan | Individual | None | Recreation and Tourism | Surely there have been many studies of the impact on tourism and real estate vales done in Europe, Scandinavia, and elsewhere where turbines have been in place for many years that would be informative for government decision makers considering these massive farms. |
| BOEM-2022-0025-DRAFT-0113-481 | Doug Brinkley | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0114-486 | Julia Deves | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0115-491 | Aaron Deves | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0116-496 | Kamran Givpoor | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0119-505 | Anonymous Anonymous 13 | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0120-510 | James Bond | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0125-521 | Behnaz Yalda | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0126-526 | Penn Wyrough | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0132-539 | John Harman | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0133-545 | Donna Fisher | Individual | None | Recreation and Tourism | The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to be fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0138-556 | Paul Taltavull | Individual | None | Recreation and Tourism | The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to be fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0140-563 | Anonymous Anonymous 15 | Individual | None | Recreation and Tourism | The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to be fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0142-570 | Julie Grohovsky | Individual | None | Recreation and Tourism | The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to be fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0145-580 | Sandy A | Individual | None | Recreation and Tourism | The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to be fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0147-588 | E. B. Cohen | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0149-594 | Charles Licameli | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0153-601 | Terencer J. McGean | Local agency | Town of Ocean City Maryland | Recreation and Tourism | The visual impact of a 14 MW Tower (853' height, 721' blade diameter, 493' tower) at 13 miles is roughly equivalent to<br>the impact of the 6MW study tower at 7.5 miles (Exhibit 2 and more generally Visual Study by Sullivan4). 12% may not sound like a lot, but I assure you it is the difference between success and failure for a small business. That study only talked about trips to the beach, it did not look at the potentially disastrous effect on property values The NC State Study2 however did look at the impact on property values. It found that over 50% of renters would not return to a beach with visible turbines for any amount of rent discount.... Economic studies by North Carolina State University1, University of Delaware 20162, and BOEM 3 all predict significant negative economic impacts to beach economies from visible offshore wind turbines. |
| BOEM-2022-0025-DRAFT-0155-606 | Andrew Finley | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0156-611 | Joanne Finley | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0157-616 | Anonymous Anonymous 16 | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0158-621 | Piper Bond | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0176-674 | Michael Heck | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0184-704 | Jennifer Holmes | State agency | Delaware Department of Natural Resources and Environmental Control | Recreation and Tourism | Public Access, Tourism, and Recreation<br>• Describe measures to maintain public access throughout construction phase.<br>• Avoid construction during peak summer tourism season from Memorial Day through Labor Day.<br>• Evaluate economic impacts from temporary beach and/or waterway closures. |
| BOEM-2022-0025-DRAFT-0195-734 | George Krusen | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind's proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0198-741 | Thomas Shipman | Individual | None | Recreation and Tourism | The economic analysis should include the adverse impacts on the economy that may result based on diminished tourism caused by unsightly towers being located so close to the shore. The proposed project turbines are substantially taller than those included in the initial project proposal. The impact of these taller structures, including additional subsurface vibration and bottom disturbance should be fully evaluated. |
| BOEM-2022-0025-DRAFT-0199-746 | Susan Brennan | Individual | None | Recreation and Tourism | 6. In researching tourism of wind turbines in the US, I found 6 Trip Advisor reviews of tour boats for Block Island OSW. Not all six were favorable. |
| BOEM-2022-0025-DRAFT-0204-774 | Stephani Ballard Wagner | Individual | None | Recreation and Tourism | THE PROJECT WILL HAVE ADVERSE EFFECTS AND UNKNOWN, POTENTIALLY ADVERSE, EFFECTS ON SOCIOECONOMIC, CULTURAL, SCENIC AND VISUAL RESOURCES, PARTICULARLY FOR DELAWARE.<br>• The Project will definitely have an adverse impact of the “human environment” enjoyed by Delaware residents, boaters, fisherman and beachgoers, both during the construction phase, involving vertical and horizontal drilling and heavy work, and the subsequent and perpetual visual/scenic pollution due to the very close (for a wind farm) proximity of the Lease Area to shore, coupled with the unusually excessive height (938+ feet) sought to be approved for the turbines (see above).<br>• US Wind will need ample lighting on the turbines for the safety of both aircraft and vessels. US Wind claims the aircraft lights would be “motion activated” rather than permanently lit at night, yet this sounds very risky. It is far more likely that, if approved at all in other respects, the FAA would require constant lighting, resulting in more visual detriment to viewers on shore and more disruption of the natural beauty of the area.<br>• The construction phase of a 3Rs Road landfall would have an adverse effect on residents of nearby communities and users of the State Park facilities, even if it is suspended during the summer season. The area is used all year and some residents are year-round. Again, it should be emphasized that these detriments will be suffered exclusively by Delaware residents, for the benefit of Maryland project.<br>• US Wind’s claims that the project would bring any significant economic benefits to Delaware in terms of employment or tourism are unsupported by evidence, and seem specious. Construction employment would be temporary at best. The economic detriment of persons not wanting to vacation in a heavy construction zone, and subsequently on beaches with impaired views from turbines seems certain. |
| BOEM-2022-0025-DRAFT-0206-798 | Brooks Gearhart | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind’s proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0208-804 | Catherine Gearhart | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind’s proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-DRAFT-0209-809 | David Gearhart | Individual | None | Recreation and Tourism | 5. The potential impacts of US Wind’s proposed project on socioeconomic and cultural resources, including recreation and tourism, need to fully assessed in the EIS using appropriate data and surveys. |
| BOEM-2022-0025-EMAIL-276-894 | Jonathan Meade | Federal agency | NPS | Recreation and Tourism | The Land and Water Conservation Fund (LWCF) State Assistance Program was established by the LWCF Act of 1965 (Public Law 88-578) and is enacted as positive law at 54 U.S.C. § 2003 et seq. The purposes of the LWCF Act are to assist in preserving, developing, and assuring accessibility to outdoor recreation resources for all citizens and visitors in the United States. There are a number of LWCF state and local assistance sites along the coast in the US Wind Project area. NPS will assist BOEM and developers in identifying these sites as areas for onshore cable connections are identified. |
| BOEM-2022-0025-EMAIL-276-898 | Jonathan Meade | Federal agency | NPS | Recreation and Tourism | Approximately 2.7 million people visit the Assateague Island NS annually. They come to relax on the beaches, surf, enjoy the oversand vehicle zone, search for seashells, witness the amazing diversity of birds along the Atlantic Flyway, canoe and kayak, fish, crab, clam and hunt. Among the seashore’s many natural and recreational attractions, it is also famous for other unique wildlife viewing, including the wild horse herd in Maryland and the separate Virginia herd managed by the "salt water cowboys" of Chincoteague...The Park’s enabling legislation and general management plan emphasize preserving and protecting the natural processes that shape barrier island geology and ecology and make barrier island unique. |
| BOEM-2022-0025-TRANS-14-51 | Lauren Brown | Individual | None | Recreation and Tourism | At the same time, I think that it would boost tourism, and that's what studies have shown. |
| BOEM-2022-0025-TRANS-22-74 | Terence McGean | Local agency | Ocean City | Recreation and Tourism | Economic studies by North Carolina State University, Delaware State University, and the University of Delaware's own study for BOEM all predict significant negative economic impacts to beach economies from visible offshore wind turbines. BOEM's own study by the University of Delaware stated at twelve and a half miles offshore, 20% of the respondents reported that their experience would have been worsened by the turbines. Later, the study states, for wind projects closer than 7.5 miles affects our negative in economic terms. Maryland trip loss at this distance was 12%. That study was based on a six megawatt turbine. The visual impact of the towers proposed by US. Wind, now at 13 miles, is roughly equivalent to the impact of the six megawatt study tower at 7.5 miles. 12% may not sound like a lot, but I assure you it is the difference between success and failure for a small business. The BOEM study only talked about trips to the beach. BOEM's own study by the University of Delaware stated at twelve and a half miles offshore, 20% of the respondents reported that their experience would have been worsened by the turbines. Later, the study states, for wind projects closer than 7.5 miles affects our negative in economic terms. It did not look at the potentially disastrous effect on property values. |
| BOEM-2022-0025-TRANS-22-75 | Terence McGean | Local agency | Ocean City | Recreation and Tourism | The NC State study, however, did look at the impact on property values. It found that over 50% of renters would not return It found that over 50% of renters would not return to a beach with visible turbines for any rent discount. Clearly, an independent evaluation of the potential negative economic and cultural impacts that these new super sized turbines would have on Ocean City needs to occurring on old studies based on turbines half the size or located onshore in the Midwest or offshore in the North Sea in Europe, simply do not apply to this installation, where 114 turbines almost 1000ft tall are proposed to be placed within clear viewing distance of a beach resort that contains over $9 billion in real estate within a three and a half square mile area and host 8 million beach visitors each year. |
| BOEM-2022-0025-TRANS-30-107 | Harjeet van der Keyl | Individual | None | Recreation and Tourism | How bad is it going to be 11 miles away? Can you see it sitting on the beach? And we just recently bought a house at actually Delaware, but my understanding is that our beach will be impacted by this operation. So I'm very concerned because we do rent our house out to pay for some of the expenses that are associated with the house. And if it's going to impact the number of people who rent the house, that is going to impact financially our bottom line. |
| BOEM-2022-0025-TRANS-31-111 | Coralie Pryde | Individual | None | Recreation and Tourism | I believe the University of Delaware study, at least one I read, said that there would not be a negative effect of having wind turbines off the Delaware shore. Very few people might be turned away from the thought of seeing the towers, which will only have a low level of Usability.<br>Number of other people might actually come to the store to observe them. I would put myself in that class. I would like to go down and see the first installation that's made in Delaware. |
| BOEM-2022-0025-TRANS-35-123 | Kathy Phillips | Individual | None | Recreation and Tourism | And finally, I'd like to address the baseless claims by the town of Ocean City that being able to see these turbines will destroy Ocean City's economy. I would like to remind everyone that in the 80s when beach replenishment and the establishment of a large dune, when that project came to Ocean City, there was a lot of human cry by property owners and condominium owners and hotels that the building of this dune in front of their properties was going to doom them to losing customers and therefore not being able to pay their mortgages and losing their condominiums and their ocean front homes. As we have seen, actually that dune has indeed spared them great cost. And in fact today you will notice that many of the condominium associations actually have teams that take great pride in the dune, keeping it vegetated and cleaning it up. |
| BOEM-2022-0025-TRANS-47-155 | Brian Gilliland | Individual | None | Recreation and Tourism | There's a two legged economic infrastructure in Worcester County, tourism and real estate. They've been looking forever, and everyone's throwing their hands up. Tourism and real estate. What could we possibly do besides tourism and real estate? Well, the answer is staring you in the face. You can get into the energy sector. |
| BOEM-2022-0025-TRANS-51-165 | Richard Meehan | Local agency | Ocean City, Maryland | Recreation and Tourism | We can also support the wind farm projects, but they should not come at the expense of the town of Ocean City. Ocean City has one industry, and that's tourism. |
| BOEM-2022-0025-TRANS-58-194 | Mary Beth Carozza | State agency | Maryland State Senator District 38 | Recreation and Tourism | This request is partially based on the economic studies by North Carolina State University, Delaware State University and the University of Delaware that all predict significant negative economic impacts to beach economies from visible offshore wind turbines. |
| BOEM-2022-0025-TRANS-7-23 | Jill Gaumer | Individual | None | Recreation and Tourism | The only study to the tourist impact of offshore wind was done by the University of Rhode Island, in a survey from Airbnb on Block Island. And to nobody's surprised, this study showed a significant increase in vacation rentals from the wind turbines where it just built 3 miles off the coast. This shows empirical evidence to support that offshore wind can actually attract tourism. |
| BOEM-2022-0025-TRANS-7-24 | Jill Gaumer | Individual | None | Recreation and Tourism | I anticipate the proposed wind turbines will add to my property value and add to the aesthetic of my beach view shed. Beauty is in the eye of the beholder, and my take is that the turbines are more beautiful than the tankers or refineries. |

| Comment ID | Name | Commenter Type | Affiliation | NEPA Resource Topic | Comment Excerpt |
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| BOEM-2022-0025-DRAFT-0001-208 | Frank Graeff | Individual | None | Scenic and Visual Resources | As a Maryland resident I strongly support more wind energy off our shores. I frequently vacation in western Maryland where turbines are common and don't detract from the natural beauty. Any claim the turbines would hurt the local economy should factor in those of us who wouldn't want to travel to an area that kills green energy projects |
| BOEM-2022-0025-DRAFT-0002-212 | J L | Individual | None | Scenic and Visual Resources | I will be *more* likely to go to Ocean City in the summers if I can look out and see beautiful wind turbines on the horizon. |
| BOEM-2022-0025-DRAFT-0007-218 | Anonymous Anonymous 2 | Individual | None | Scenic and Visual Resources | Please move the wind turbines farther off the coast. 20 miles is not far enough. They should be as far off the coast as possible in order to preserve the views and the impact on the community and tourism. No one wants to look out over the water and see obstructed views. It makes sense to address this now while it can be changed rather than after they are already in place and having a negative impact. |
| BOEM-2022-0025-DRAFT-0016-232 | Kenneth Wolf | Individual | None | Scenic and Visual Resources | I am opposed to any wind farm off the resort beaches of the Maryland/Delaware coast where turbines are visible from the beach at any time and in any weather condition . If these turbines are visible at all , this will result in substantial and long lasting economic harm to the city of Ocean City MD and Worcester County Maryland and their residents .This will also irreparably deprive hundreds of thousands of visitors and residents of a non-industrial viewshed . This conclusion is based on the only authoritative an unbiased study done on the subject , by North Carolina State university as released on April 4th 2016 entitled " Near-Shore Wind Farms Would Have Big Impact on Coastal Tourism" https://news.ncsu.edu/2016/04/taylor-coast-2016/ .A principle finding stated that - 54% of tourists said they would not come to The Outer Banks if they could see the turbines at all……even if they were given a discount in their rental. The Wind industry and the government have seemingly ignored this vital study. There are only two possible ways to overcome the logical fire bell in the night scenario this study presents. One is to move these turbines further offshore so they are not visible at all day or night. The other is to fund an honest and comprehensive study that proves without a doubt that visible turbines on the O.C. beaches will not have this devastating effect. If the industry was convinced that the problem as identified in this cornerstone study did not exist, they would have funded this type of study a long time ago. Please do not proceed without one of these protections. |
| BOEM-2022-0025-DRAFT-0020-236 | Elizabeth Reineck | Individual | None | Scenic and Visual Resources | As a property owner in Ocean City, MD, I am deeply concerned about the proposed wind turbines off the coast of Maryland. There is limited oceanfront in the state of Maryland, and littering our beautiful coast with industrial turbines will forever change the landscape and economy of this now thriving resort town. The proposed plans, approved by small committees, have not taken into account the opinions of the 30K+ homeowners and businesses that have invested in Ocean City. These investments are predicated on the beautiful ocean views available from one of America's best beaches, which has prided itself in pristine water and sands. People come to Ocean City to relax, escape, and enjoy nature with the pods of dolphins swimming at sea, not look out on towering metal structures near the height of the Chrysler building flashing red lights by night 13 miles away. |
| BOEM-2022-0025-DRAFT-0023-245 | David T. Stevenson | Non-governmental organization | Caesar Rodney Institute | Scenic and Visual Resources | BOEM has no suitable study to determine the cost impact of viewshed loss. Three studies exist to form a basis for determining the cost impacts of viewshed loss, and all are out-of-date as they used visualizations of 579' to 600' tall turbines while US Wind is planning to use 18 MW, 938' tall turbines, and states in the COP they will move to bigger turbines if available..... Clearly, the disruption of the viewshed will be affected in a major way with losses in the $3 billion/year Delaware, and $5 billion/year Maryland tourism industry. Property values will also fall. A new study of viewshed effects is needed focused on potential economic impacts of much larger turbines. |
| BOEM-2022-0025-DRAFT-0029-267 | Gillet Boyce | Individual | None | Scenic and Visual Resources | I think the windmills are too close to shore, they are enormous on the horizon. As the size of the windmills has increased so should the distance from the shore. I believe this project will decrease the value of our community, and it is unsightly day and night.<br>This project should be 30 miles or more offshore so the windmills are less visible. |
| BOEM-2022-0025-DRAFT-0031-269 | Michael Papa | Individual | None | Scenic and Visual Resources | I am writing to express a strong dissent to the wind turbines that will destroy the view I have paid to secure. As a tax paying owner of property in OC, I am disappointed at he lack of opportunity to dissent. I attended a hearing in January 2020 at the OC Convention center - easily 95% opposed., and the room had to be expanded to get all the folks in there. |
| BOEM-2022-0025-DRAFT-0047-305 | Rose Mary Hoy | Individual | None | Scenic and Visual Resources | The skyline will be permanently adulterated, with these tall windmills visible from shoreline (especially when lit up at night). |
| BOEM-2022-0025-DRAFT-0052-318 | Megan Staczek | Individual | None | Scenic and Visual Resources | The skyline will be permanently adulterated, with these tall windmills visible from shoreline (especially when lit up at night). |
| BOEM-2022-0025-DRAFT-0058-330 | albert sweeney | Individual | None | Scenic and Visual Resources | The original proposal that was discussed with residents had shorter blades that would not be visible from shore and would not have been seen from shore and thus would not impact tourism or the beach site lines. |
| BOEM-2022-0025-DRAFT-0060-334 | Jay Beam | Individual | None | Scenic and Visual Resources | This project would negatively impact both residents, visitors and tourists due to the negative visual effects of the wind farm located less than 12 miles offshore. Studies have shown that there is a strong preference for an ocean view that does not include visible turbines (The Amenity Cost of Offshore Windfarms: Evidence from a Choice Experiment; August 2017). This study notes that 55% would not re-rent their vacation property if wind turbines were placed offshore. |
| BOEM-2022-0025-DRAFT-0069-352 | Vicki Carmean | Local agency | Fenwick Island | Scenic and Visual Resources | I am opposed to the offshore plans of US Wind to build over 100 938 feet tall wind turbines only 10 miles from our shores: First, these wind turbines will certainly be visible from our shore line changing what is a pristine coastal beach resort. community into an industrial site. |
| BOEM-2022-0025-DRAFT-0074-363 | Anonymous Anonymous 9 | Individual | None | Scenic and Visual Resources | I am concerned with the offshore wind project off the coast of Maryland. In reality it really is off the coast of Fenwick Island, Delaware. The location will create an viewscape problem for our community. The original plan called for a much smaller turbine but now we have learned they are 938 feet tall. At night with the red warning lights and other devices this will be a nightmare. As the Mayor of Ocean City said we have one chance to get it right. |
| BOEM-2022-0025-DRAFT-0075-365 | Thomas Bergin | Individual | None | Scenic and Visual Resources | While no one would want progress in green energy to stop, but the placement of 100 turbines, which are 938 tall, 10 miles off our shore will literally destroy this town. People visit Fenwick in the spring, summer and fall to enjoy time in an almost pristine environment, i.e., to sit and swim with their families on our wide sandy beaches. This proposal will make it seem like you are in industrial park, and I have never known anyone who wanted to vacation in such a environment. Although 10 miles is a good distance, one hundred structures which are almost 1000 feet above the water will blot out the horizon and forever ruin the serenity which we believe is our right. The result will be that fewer people come here for their vacations and this will impact home owners as well as businesses which rely on our visitors to make a profit in the summer season. |
| BOEM-2022-0025-DRAFT-0086-400 | Suzanne Battista | Individual | None | Scenic and Visual Resources | The skyline will be permanently adulterated, with these tall windmills visible from shoreline (especially when lit up at night). |
| BOEM-2022-0025-DRAFT-0089-407 | Pat & Miles Weigold | Individual | None | Scenic and Visual Resources | We enjoy our summers at the beach and are extremely concerned about the impact of this wind farm as proposed. Not only from the perspective of visual impact but also the economic impact on tourism on the Delaware seashore. |
| BOEM-2022-0025-DRAFT-0104-451 | Michelle Bryan | Individual | None | Scenic and Visual Resources | I live in Indian Beach, Dewey Beach DE. I am against the windfarms being so large and so close to our beach. We believe the windfarms will be an eye sore, will degrade the value of our property and will diminish our beautiful views. We believe the wind farm should move at least 30 miles off shore below the horizon and out of view from the beach. |
| BOEM-2022-0025-DRAFT-0153-602 | Terencer J. McGean | Local agency | Town of Ocean City Maryland | Scenic and Visual Resources | Twelve years later we are now presented with a COP with turbine heights more than twice what was envisioned in 2010 yet located the same distance from shore. Absolutely nothing has been done to address the impact to our viewshed from this change…. |
| BOEM-2022-0025-DRAFT-0162-627 | Martin Sonnenberg | Individual | None | Scenic and Visual Resources | The Viewshed will be affected permanently. The idea that the towers will be "just a spec on the horizon," as recently stated at a meeting by Orsted, is opinion and to both residents and property owners less than factual…. |
| BOEM-2022-0025-DRAFT-0168-658 | Karen Auwaerter | Individual | None | Scenic and Visual Resources | Lighting - The presenters gave inconsistent answers as to the lighting. It's not clear how many lights will be on the towers, where on the towers they will be located, how visible these lights will be, and whether they will be on all day and night. The presenters initially said no lights would be present, and then changed course when asked about the lights on the Block Island towers. These lights can contribute to light pollution and will have impacts on migratory birds and other species. How can Delaware approve these projects and onshoring if it isn't clear what the lighting will be and without an effective study of the impact of this lighting? |
| BOEM-2022-0025-DRAFT-0170-663 | Lou Manzo | Individual | None | Scenic and Visual Resources | Lighting - The presenters gave inconsistent answers as to the lighting. It's not clear how many lights will be on the towers, where on the towers they will be located, how visible these lights will be, and whether they will be on all day and night. The presenters initially said no lights would be present, and then changed course when asked about the lights on the Block Island towers. These lights can contribute to light pollution and will have impacts on migratory birds and other species. How can Delaware approve these projects and onshoring if it isn't clear what the lighting will be and without an effective study of the impact of this lighting? |

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| BOEM-2022-0025-DRAFT-0171-666 | Pam Pridgeon | Individual | None | Scenic and Visual Resources | As for the view shed, I recently saw a study done that found on a clear day along the coast the windmills would be barely visible at 9 Miles out. I checked the NWS weather site and as it was overcast that particular day it was interesting to see that I could clearly see the ocean horizon at their “Visibility” determined to be 9 miles. Today is clear and the NWS has our visibility at 10 miles. So YES, our view shed, our Marine Environment, Marine Mammals, Marine life, and yes our planet earth are destined to be destroyed by a technology founded on technology that is not advanced enough yet and those who will make vast amounts of money. |
| BOEM-2022-0025-DRAFT-0178-679 | William J. Cook | Local agency | Cape May County, NJ via Cultural Heritage Partners | Scenic and Visual Resources | 2. Visual Impacts<br>The COP’s Visual Impact Assessment and Visual Simulations are far too limited in scope and do not provide enough information for consulting parties to adequately assess potential impacts. In addition, proposed construction is expected to cause significant adverse effects to historic properties within the Project Area and Area of Potential Effect. Although the information provided in the COP is helpful in determining which historic properties may be affected, we are unable to understand the full extent of visual impacts to all of Cape May County’s historic properties. Visual assessments that are this limited in nature are not only unreasonable, but also arbitrary, capricious, and contrary to federal law.<br>As presented in the COP’s Appendix J1 its accompanying Appendix A, the current visual assessment and simulations are inadequate to show the actual impact of the wind turbines and associated infrastructure and must be amended to assess accurately adverse impacts and to determine appropriate avoidance, minimization, or mitigation measures from additional vantage points. These vantage points should include all historic districts, as well as all properties listed or eligible for listing in the National Register, and any National Historic Landmarks. In addition, vantage points for revised simulations should include additional points in Cape May County, including but not limited to the Cape May Historic District—a National Historic Landmark—which has provided countless people with a place for solitude, access to nature, and an uninterrupted seascape for centuries. There is a potential for US Wind to irreparably alter this setting, as well as for all historic properties along Cape May’s coastline.<br>Furthermore, the COP does not discuss fully how US Wind will address potential lighting impacts, including during the construction phase. The County is especially concerned about lighting impacts to the dark night sky both during and after construction, and urges BOEM to take a hard look at these impacts and mandate ADLS. In addition, BOEM should also consider visual impacts of lighting at each proposed turbine’s base and reflections on the ocean’s surface. |
| BOEM-2022-0025-DRAFT-0179-687 | Kathleen Campanella | Individual | None | Scenic and Visual Resources | Lighting: The presenters gave inconsistent answers as to the lighting. It’s not clear how many lights will be on the towers, where on the towers they will be located, how visible these lights will be, and whether they will be on all day and night. The presenters initially said no lights and then changed course when asked about the lights on the Block Island towers. These lights can contribute to light pollution and will have impacts on migratory birds and other species. These projects and onshoring should not be approved if it isn’t clear what the lighting will be and without an effective study of the impact of this lighting. |
| BOEM-2022-0025-DRAFT-0184-705 | Jennifer Holmes | State agency | Delaware Department of Natural Resources and Environmental Control | Scenic and Visual Resources | Visual and Scenic Resources<br>• Consider configuring turbines to reduce visibility impacts to onshore populated areas.<br>• Assess impacts to housing and property values from scenic disruptions. |
| BOEM-2022-0025-DRAFT-0186-711 | Sarah Albertson | Individual | None | Scenic and Visual Resources | Lighting - The presenters gave inconsistent answers as to the lighting. It’s not clear how many lights will be on the towers, where on the towers they will be located, how visible these lights will be, and whether they will be on all day and night. The presenters initially said no lights would be present, and then changed course when asked about the lights on the Block Island towers. These lights can contribute to light pollution and will have impacts on migratory birds and other species. How can Delaware approve these projects and onshoring if it isn’t clear what the lighting will be and without an effective study of the impact of this lighting? |
| BOEM-2022-0025-DRAFT-0187-716 | John Donofrio | Individual | None | Scenic and Visual Resources | Lighting: The presenters gave inconsistent answers as to the lighting. It’s not clear how many lights will be on the towers, where on the towers they will be located, how visible these lights will be, and whether they will be on all day and night. The presenters initially said no lights and then changed course when asked about the lights on the Block Island towers. These lights can contribute to light pollution and will have impacts on migratory birds and other species. These projects and onshoring should not be approved if it isn’t clear what the lighting will be and without an effective study of the impact of this lighting. |
| BOEM-2022-0025-DRAFT-0192-726 | David Dempsey | Individual | None | Scenic and Visual Resources | Visual Blight. The BOEM should account for the projects’ impact on views from the shore –especially since these coastal communities rely on tourism to drive their economy. |
| BOEM-2022-0025-DRAFT-0199-745 | Susan Brennan | Individual | None | Scenic and Visual Resources | 5. In researching the lease areas off the Delaware and Maryland coasts, I only came across one public survey relating to the visual impact, completed in 2018 and published in 2019. If I am correct, it only includes Delaware residents and beach areas. Given the magnitude of this proposed OSW project off the Delaware and Maryland coast I would ask that an extensive public survey be required during peak beach season (July & August) in Maryland and Delaware with updated information relative to the height and distance of the turbines and locations of the substations, etc. to gain an updated (2022/23) opinion of the visual impact. Since 2018, much has changed including the pandemic which has changed the way the public views open space. Just look at the lines at our National Parks. |