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Sea Girt
New Jersey
WHERE THE CEDARS MEET THE SEA

Don Fetzer, Mayor
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Mr. Jon,

I submit these comments on behalf of the Borough of Sea Girt regarding the draft Outer Continental Shelf, or OCS, air permit application for Atlantic Shores Offshore Wind Project 1, LLC, for the construction and operation of a wind-to-energy project offshore of the New Jersey Coast (referred to herein as a “turbine clusters”.) We understand that Atlantic Shores has submitted this application to address both projects referred to collectively as “Atlantic Shores Project”. In that regard, the Borough objects to the “collective” application. Included is the project located 8.7 miles from the New Jersey shoreline near Atlantic City, New Jersey. On behalf of the Borough governing body, I respectfully request that the EPA deny the application.

For purposes of the record, and to supplement these comments, I am attaching comments previously submitted to BOEM and the New Jersey Board of Public Utilities by the Borough of Sea Girt.

Initially, the Borough of Sea Girt is gravely disappointed that EPA and BOEM, together with certain New Jersey state agencies, have rushed this process and have been less than transparent. This process of steamrolling through the regulatory process, rather than following a deliberate and transparent process, is contrary to the intent and purpose of the Administrative Procedures Act’s provisions regarding public participation and comment. Whether one supports wind energy or not, the short cuts and lack of transparency when considering the magnitude of the decisions are troubling. The decisions being made are life-altering for residents of the Jersey Shore, and Sea Girt residents in particular, who will be burdened with the trenching of transmission wires through our Borough which could compromise their health and well-being. Adequate public participation in the process is essential but lacking. One of the shortfalls in this process is the failure of the EPA to answer questions during the process. Questions were not considered during the August 12 hearing. We implore the EPA to change its approach so that it carries out its overarching mandate to protect human health and the environment.

The Borough believes that the application fails to adequately address or consider the long-term impact of turbine cluster placement on increased run-time of commercial and recreational fishing vessels, as well as coastal and international ships whose routes will also be lengthened by turbine cluster placement. We see that EPA addresses “Types of Vessels included

in the OCS Source Potential Emissions”. Likewise, in its “Emission Units subject to Chapter 55” analysis, it addresses potential emissions: “Potential emissions means the maximum emissions of a pollutant from an OCS source operating at its design capacity. Any physical or operational limitation on the capacity of a source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as a limit on the design capacity of the source if the limitation is federally enforceable. Pursuant to section 328 of the Act, emissions from vessels servicing or associated with an OCS source shall be considered direct emissions from such a source while at the source...”. We think this analysis misses an important and impactful point. We believe the EPA has the obligation, and ability, to consider the direct emission impacts of the turbine clusters caused by commercial and recreational fishing vessels, as well as coastal and international ships, being forced to take protracted routes to circumvent clusters. So, for example, commercial and for-hire fishermen have long pointed out that the turbine clusters will force them to take protracted routes to offshore fishing grounds to circumvent the clusters. Likewise, for many (e.g. clam, scallop and finfish fishermen) the clusters’ locations will limit access to certain grounds and force those vessels to take more circuitous routes to other grounds, thereby forcing them to burn more fuel while seeking to produce food for consumers and access recreational opportunities. The EPA emphasizes the impacts of ships that will do additional research, construction, and maintenance of the turbines and transmission lines (as well as the emissions from the turbines and other related infrastructure). It fails to adequately address the long-term impacts of turbine cluster locations on the vessel routes, as well as coastal and international ships. In summary, these clusters will force vessels to run further, burn more fossil fuels, add to the cost of food and other products to U.S. consumers, and impact air quality. This impact on an industry providing a valuable food source, recreational opportunities, and goods brought to and from New Jersey and New York ports, is not adequately addressed if not ignored.

We also have concerns regarding the impact of transmission cables on the subaqueous environment. Moreover, the potential impacts on ambient temperature from increased water temperatures coming from many miles of “hot” transmission wires running from the clusters to the shores should be considered. Has an analysis been done of this impact? It is bad enough that these cables will be trenched through Essential Fish Habitat (as defined in the Magnuson–Stevens Fishery Conservation and Management Act). Has it been determined what impact the swath of cable running many dozens of miles underwater will have on the water temperature along the route? It has been argued that water temperatures are increasing, yet it is proposed that this massive length of cable will run underwater before being trenched through a beach in which endangered and threatened species’ breeding grounds are located. Is there an impact on ambient temperature, and water temperature, that will exacerbate the claim that our ocean water temperatures are increasing? This project should not proceed, and permits should not be granted by EPA, until and unless a solid and substantive analysis of the impacts are ascertained.

Some of the deleterious impacts of these industrial turbine clusters will have on the marine environment were addressed by the National Marine Fisheries Service. An honest analysis of the impacts on migratory waterfowl, Puffinus species, and other migratory birds that fly at night over the ocean between New Jersey and New York needs to be performed. While not all of this falls under the purview of the EPA, this agency should assure the appropriate agency addresses these concerns vis a vis the impacts of massive turbines. We ask the EPA to do a thorough and honest analysis of the environmental impact of these turbine clusters and, where appropriate, ask the appropriate agency to address the issue.

Respectfully submitted

Honorable Donald Fetzer
Mayor, Borough of Sea Girt