

August 2024

Michael Regan, Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
Re: Atlantic Shores Offshore Wind Project 1, LLC, Atlantic Shores Project Public Comment

To Administrator Michael Regan,

On behalf of the constituents of the 10th Legislative District, I am urging the United States Environmental Protection Agency to reject the Clean Air Act, Outer Continental Shelf Permit to Construct and Operate for the Atlantic Shores Offshore Wind Project 1, LLC, Atlantic Shores Project 1 and Project 2 (referred to here collectively as the Atlantic Shores Project).

The Atlantic Shores Project has not included a reasonable accounting of the total lifetime emissions cost to our State. Where there is an attempted analysis, the ranges of potential outcomes are far too large to justify a project of this scale. The model's assumptions are not sound. This needs to be sent back to the drawing board before a permit can be granted.

In analyses measuring the net emissions caused under this project, there is lack of reasonable accounting for the increased distances and engine run time from commercial and recreational vessels that may operate in the area. These vessels may want to avoid several routes through these turbine areas due to the increased risk of accidents. According to the National Academies, "offshore wind farms can interfere with ship radar and navigation." Several of these area avoidances will therefore result in increased lifetime emissions.

Further, the permit application does not require the Atlantic Shores Project to utilize the most efficient marine vessels for the construction and maintenance of these projects. In the permit application, it specifically states that "the air emission estimates presented in this application are subject to change." By how much? No permit should be granted until they are required to operate the most efficient vessels available to reduce the air quality impact to our State.

Please heed the concerns of my constituents and reject this permit application. And to discuss this issue further, please reach out to me and my office.

Sincerely,

Assemblyman Paul M. Kanitra
10th Legislative District
852 Hwy 70 Brick, New Jersey
732-840-9028