



Save Long Beach Island, Inc.  
PO Box 2087  
Long Beach Township, NJ 08008  
[www.savelbi.org](http://www.savelbi.org)

August 27, 2024.

Dear Elected Representative, NJBPU President Guhl-Sadovy and BPU Commissioners,

The recent breakage of a single turbine blade from the Vineyard Wind 1 project off Nantucket, MA., which spewed small and large, and sharp and blunt pieces of debris many miles into the ocean and onto beaches, has highlighted the unanswered questions and lack of information regarding the Atlantic Shores Offshore Wind project here, proceeding rapidly toward construction. Such unanswered questions go far beyond ours, but extend to those from future generations to whom we appear to be leaving the burden of the response to.

The Atlantic Shores project itself is in many respects unique in its siting. It would be the most visible, shore intrusive modern wind project in the entire world. It has been placed within and adjacent to a historic migration corridor of the critically endangered North Atlantic right whale, and carries with it a host of other adverse impacts as listed below.

The unanswered questions of most concern include:

1. **Future Electric Cost**, the impact on the State's electric users and economy of the much higher electric rates to all State users expected just from this project, by our expert consultant's estimate 22, 27 and 32 percent for the residential, commercial, and industrial sectors respectively. The impact of such increases on those struggling to pay higher bills as it is, as well as on the competitiveness of our businesses needs to be highlighted and considered.
2. **Longevity**, based on current regulatory requirements which DO NOT require turbine removal at the end of their useful life, the lack of any company dedicated funding or commitment to do so, the sheer size and weight of these structures, and

the lack of any onshore industrial infrastructure, now or expected in the future, to dismember and process them onshore, it has become increasingly evident that the federal government will never order such removal, but rather leave the turbines in place or have them toppled in place. This would leave a visual blight and the loss of tens of thousands of acres of productive marine resource for generations to come, or alternatively place the burden of removal on future State generations. Is the state prepared to place this burden on them? This issue has been skirted in all the documentation to date and requires illumination.

3. **The Degradation of the Shore Experience**, the federal environmental impact statement and the Company's Construction and Operations Plan for the project acknowledge that the project will create; "highly visible, haphazard rows of spinning wind turbines will forever decimate the natural beauty of the horizon", "an increased sense of visual clutter and ultimately negatively impacting the quality of the view", and that "the disorienting effect of hundreds of rotating blades will compel people to look the other way". Please picture our future tourism advertisements showing beachgoers with their chairs facing away from the ocean.

But it doesn't stop there. Airborne noise from the thunderous impact of pile driving during construction as well as from the operation of the turbines will be audible at the shore, and is likely to be of a pulsating, and annoying character. In addition, there will be a significant reduction in the natural shore breeze and wave action because the field of turbines will extract a good part of the wind energy normally received at the shore, None of these effects have been presented analytically in the project's impact statement or construction plan, despite the fact that airborne noise assessments have been done for other projects that are farther from shore.

4. **Turbine Component Failures**, there has been no assessment presented of the likelihood, frequency and consequences of turbine component failures during operation such as the recent Nantucket blade breakage incident, nor discussion of who will bear the cost of cleanups which is likely to be considerable. Similar issues remain unaddressed for hurricane and extreme storm caused structural failures both during turbine operation and after the turbines are placed out of service but remain in place.

5. **Marine Mammal Deaths**, the agencies can continue to make unsupported statements of denial and no evidence from unnamed "experts" relating the noise from vessel surveys, pile driving of foundations. and from turbine operation to marine mammal fatalities. But substantial scientific evidence does exist that the

noise from these activities will cause ongoing whale and dolphin deaths for years and that turbine operational noise, which has been ignored by the agencies, has the potential to block the essential migration of the critically endangered North Atlantic right whale as it attempts to do so off our shore. Responsible decision-making demands a serious analysis of the operational noise problem.

6. **Increased Vessel Navigation Safety Risk**, East Coast commercial and military vessel traffic will now be channeled into a narrow 11-mile corridor in-between the Atlantic Shores project and other planned wind complexes off of New Jersey. At the same time, vessel marine radars are likely to be compromised by the wind turbines on either side of them. No cumulative project assessment of that risk has been conducted. And to compound the problem that same corridor has been used historically by the North Atlantic right whale to migrate.

7. **Fishing**, the loss of traditional fishing grounds and revenue, in particular, regarding the Surf Clam industry has not been addressed.

8. **Ancient, now Submerged Archaeological sites**, the Environmental Impact Statement acknowledges the presence of ancient now submerged, potentially very valuable archeological resources, dating back tens of thousands of years which could shed light on the identity of the first persons to come to North America. Yet no assessment has been provided as to how these resources will be protected against the destructive impact of foundation pile driving.

9. **Defense Capability**, the Atlantic Shores turbines will interfere with the operation of our military radars in Gibbsboro, New Jersey, which look out over the ocean for unwanted aircraft as part of our NORAD early warning defense system. A defense contractor employed by the company concluded that the Department of Defense “should be concerned” with this impact but there has been no further illumination of this issue.

10. **The Brigantine National Wilderness Area**, New Jersey fortunately still claims this unique area, which is protected by stringent air quality and other standards. The air pollutants emitted during pile driving construction are likely to exceed those standards, yet there has been little discussion and illumination of this problem.

11. **Climate Change Benefit**, it has been suggested by some that these risks and consequences must be borne in the name of addressing the climate change problem. We could not agree more that climate change should be addressed to the

extent feasible. But the federal impact statement itself says that this project and similar ones will have a “negligible” impact on that problem. A review of International Panel on Climate Change report data shows, given the warming direction that the world is heading now, that the only effect of U.S. greenhouse gas reductions on sea level rise now will be to delay whatever is already coming, not to stop it or reduce it. For this project, that delay would be on the order of a week. In terms of tons of greenhouse gases removed per dollar spent, offshore wind energy is the most expensive and least effective way to go about the problem. This side of the equation should also be explored with a look toward better alternatives.

As you can see from the enclosed letter, Save LBI invited Atlantic Shores project management to meet and explore these issues but we have received no response.

It would seem to be in everyone’s interest to address these substantial unknowns now before irrevocable decisions are made rather than later, because they will not go away, and will surely be coming in greater earnest when New Jerseyans see the turbines off shore and the increases in their electric bills.

Therefore we strongly urge the BPU to hold a series of public forums, and that the State Legislature and the U.S. Congress hold hearings before any decision is made to award new subsidy monies to the Atlantic Shores project.

Thank you very much for considering.

***Bob Stern***

Bob Stern, Ph.D., President,  
Save Long Beach Island, Inc.

Enclosure: letter to Joris Veldhoven:

August 1, 2024  
**Joris Veldhoven, CEO**  
**Atlantic Shores Offshore Wind (ASOW)**  
**One Dock 72 Way**  
**Brooklyn, NJ 11205**

**Re: Public Forum on Long Beach Island, NJ**

Dear Mr. Joris Veldhoven,

My name is Bob Stern. I am the president and a founder of Save Long Beach Island (Save LBI), the coalition of citizens dedicated to protecting our oceans and New Jersey Shore communities.

A few weeks ago we invited Atlantic Shores to participate in a panel discussion at the [LBI Foundation of the Arts & Sciences](#). We received no response, so **I am formally requesting your participation in such a forum to be held on LBI** at a mutually convenient time and place.

The recent catastrophic collapse of a wind-turbine blade during testing at the Vineyard Wind project off the coast of the Massachusetts islands Martha's Vineyard and Nantucket raises new questions and concerns over the short- and long-term viability of offshore wind-turbine projects and their impact on marine life and human life.

There has obviously been widely divergent information provided to the public about the costs and benefits of the Atlantic Shores project. But to our knowledge, neither Atlantic Shores nor any of the federal or state agencies involved has ever held a public hearing or other session on the Island. The purpose of the forum is to air those differences and provide the public with the full range of information it needs to reach sound conclusions. We envision a panel discussion run by a moderator asking questions of each panelist.

Topics to be covered at the forum might include, but will not be limited to:

- The risks of turbine component failure, the shore and ocean impacts from that, and the protocols for mitigating it
- The consequences of siting the hundreds of wind turbines planned for the Atlantic Shores South and North projects in the migration path of the critically endangered North Atlantic Right Whale and in the avian migratory path known as the Atlantic Flyway.
- The consequences of siting turbines directly in areas that are now used for commercial and recreational fishing.
- The 24/7 visual and aural impact of siting wind turbines only 8-9 miles from the pristine shores of LBI and beach communities to the south, closer than anywhere in the U.S. and perhaps the world.
- The impact of airborne and waterborne noise during construction and operation of the turbines.
- The impact on shore breeze, local air temperature, and wave height.
- The impact on our military air radar at Gibbsboro, airport radar, aircraft radar, and shipboard radar.
- ASOW's commitment for the full removal of all offshore facilities, and a discussion on the technical feasibility, history, and plans for removing the turbine blades, towers, foundations, and cable runs, including how/where they will be processed and disposed of.
- The impact on NJ ratepayers and on the NJ economy from the costs of these projects.

I would appreciate hearing back from you by **August 15, 2024** so we can plan accordingly. Thank you in advance for a willingness to seriously engage the real concerns of the impacted communities. That willingness to transparent engagement will demonstrate the type of corporate citizen ASOW wants to be.

Sincerely,

Bob Stern

Bob Stern, President  
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