



# Inside Energy

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Center for Energy & Environment

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**RE: Time to push back on offshore wind on the Delaware and Maryland coast**

**DATE : 10/24/2023**

**David T. Stevenson, Director**

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The federal government is closing in on approving the large US Wind offshore wind project just 10 miles off the Delaware and Maryland coast as early as the first quarter of 2024. They have released their Draft Environmental Impact Statement (DEIS) and are open to public comments through November 20. This will be the last opportunity for public comments to request changes, or denial of permits for the project, and to establish standing to potentially sue if the project is approved as is. In person comments can be made tonight at 5 pm at the Ocean City Elementary School at 12828 Center Dr., Ocean City, and Thursday night at 5 pm at the Indian River High School, 29772 Armory Rd., Dagsboro.

The DEIS is close to 1000 pages of highly technical information. Key points are summarized below. Anyone is welcome to use this information, or information on the 15 page Public Comments without attribution:

- The entire reason for the offshore wind project is to lower carbon dioxide emissions. The project may actually increase emissions. US Wind claims possible 6.3 million metric tons of emission savings by pretending all generation will replace high emitting coal. In reality any type of generation on the regional grid may be replaced including zero emission nuclear, hydro, onshore wind, and solar. The US Wind assumption overstates saving by fivefold. Also when the project was being approved by the Maryland Public Service Commission two different consultant's 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. Emission savings should be shown as zero.
- The federal law authorizing offshore wind limits the adverse impact on historic uses of the ocean. The DEIS actually concludes commercial fishing will abandon lease areas totaling an area on the east coast equal to twice the size of New Jersey. Vessel collisions will increase while Coast Guard Search & Rescue operations will be hampered possibly leading to human deaths. Our local and national treasure of pristine ocean views will be displaced by an unavoidable, dominant presence of developed industrial views of turbines from the coastline both day and night. Studies show tourism may be reduced by 24% or more resulting in billions in economic losses, and lower property values. These are clearly unreasonable impacts on historic uses of the ocean requiring permit denial, but federal agencies have already approved several such permits.
- Existing surveys on public reaction to turbines used to determine economic impacts were done using visualizations of 579' to 600' tall turbines. The current project may use turbines 938' to 1,050' tall. New studies are needed before approving any offshore wind project.
- Tall turbines to be used for this project have never been placed in the ocean globally so the impacts on the critically endangered North Atlantic right whale, the endangered Red Knott bird, the protected horseshoe crab and other animals are unknown. Operational noise, ocean stratification, and electromagnetic field effects are unknown. The twelve turbine South Fork project under construction should be thoroughly studied for animal impacts before any other projects are approved.



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- Federal agencies have approved Incidental Take during construction & operation on recent projects without establishing a maximum allowed monthly estimated density of critically endangered NARW in the month's construction is allowed. Allowed densities vary by a 28 fold difference, and there is no standard for the version of the source data used. Requirements for Incidental Take need to be standardized.
  - The presence of stationary structures will interfere with scientific surveys such as determining seafood take limits and no alternatives have been developed.
  - The Indian River Bay is classified as a Water of Exceptional Recreational Significance, and a Harvestable Shellfish Water. Transmission cables from the Block Island offshore wind project became exposed several years ago despite burial of 6' or more, and it took years to get the cables reburied. Placing four high voltage cables in the bay only 3' deep should be viewed as unacceptable instead of the first choice as listed in the DEIS.
  - Each offshore wind turbine and substation carries many gallons of lubricating oil and diesel oil. 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.
  - This project has been approved by Maryland, however there is no specification land filled material such as turbine blades will be placed in Maryland.
  - The presence of turbines seriously impacts civilian and military radar jeopardizing safety and national defense. Lease areas need to be moved 30 to 40 miles further out to sea.

Bottom line the DEIS is legally deficient, incomplete, and full of bad assumptions and needs to be redone. The federal government should not approve the project based on this document. For details and links to source documents please see the full Public Comment document at this link;

[https://www.caesarrodney.org/pdfs/Public Comments on US Wind DEIS.pdf](https://www.caesarrodney.org/pdfs/Public%20Comments%20on%20US%20Wind%20DEIS.pdf)