

FIRST: The Atlantic Shores Environmental Impact Statement deadline for comments falls in the middle of a holiday weekend and does not provide enough time for stakeholders to respond. The deadline for comments should be extended.

SECOND: Furthermore, in reading what little of the thousands of pages contained in the DEIS in the short amount of time that was afforded, I note that it echoes in many ways the key knowledge gaps contained in the March 2023 publication Fisheries and Offshore Wind Interactions: Synthesis of Science, published by NOAA.

In this document, numerous KEY KNOWLEDGE GAPS were identified as needing further research:

1. The spatial extent to which attraction to and foraging on wind turbines enhances fish production beyond local effects, and the degree of change in production
2. Clarification on the balance of attraction/production/ecological trap
3. Upscaling of locally observed effects to the regional scale (i.e., demersal fish stock size)
4. Impacts on spawning and nursery ground quality with regard to habitat change
5. Trophic, or feeding and nutrition interactions
6. Quality of epifaunal, or benthic organisms as food for fish and subsequent levels
7. Seasonal noise effects on fish at appropriate life history stages
8. Information on the ability of animals to evade noise
9. Consideration of noise attenuation and distance from source in assessments of effects
10. Effects of pile-driving noise and operational noise were identified as priority knowledge gaps although cumulative effects of other noise sources also require attention
11. Sensitivity ranges for species of interest with regard to OSW EMF intensities and types
12. Likely encounter rates for species of interest with EMFs from OSW cables, taking account of the most relevant life stages and their movement ecology; potential for cumulative effects
13. Knowledge of migratory delays resulting from EMF encounters and any ecological consequences in the context of species/life stage-specific migration
14. Knowledge of the ability of species to derive ecologically important cues in the presence of cable EMFs (and consideration of life stage)
15. Determination and quantification of distorted predator-prey interactions and consequences for energy acquisition (for predators) or survival (for prey)
16. Potential effects on sessile life stages (e.g., eggs which may be exposed to variable EMFs over longer periods)
17. Consideration of stratification and altered hydrodynamics on species at appropriate scales, such as the influence on connectivity, larval transport, and recruitment
18. Generational effect of energy emissions (noise and EMF)
19. Early life stage effects of energy emissions on later life stages
20. Consideration of multimodal stressors
21. Consideration of cumulative effects rather than individual pressures

22. Species-specific spillover rates

BOEM has stated in Appendix E of the DEIS for Atlantic Shores that it is not willing to invest the effort or money to properly investigate these issues as well as many more.

Also in Appendix E and throughout the DEIS BOEM has cited “studies” coming directly from Atlantic Shores, the corporation that intends to install wind turbines off our coastline.

Directly from BOEM’s website, “BOEM's mission is to regulate offshore renewable energy development activities in an environmentally responsible way.” However, this is not happening. Using information provided by the applicant as a valid “study” is by no means environmentally responsible, nor is refusing to invest the effort to perform the PROPER studies PRIOR to destruction of marine habitat.

This DEIS should be declared invalid and removed from the record altogether. No proper studies have occurred on the impact of offshore wind on the east coast feeding, breeding and migration waters.

BOEM needs to start over with this document and perform the proper studies.