

I have two comments:

- 1) The time period for commenting on this project is far too short. There are 4000 pages in the documents associated with this project and there is no way that the average citizen can read and digest, much less comment on the project within the short time frame allotted. The comment period should be extended.

- 2) In the 2021 notice of intent to prepare an Environmental Impact Statement for this project, as published by the Dept of the Interior, "Expected impacts include, but are not limited to, impacts on air quality, water quality, bats, benthic habitat, essential fish habitat, invertebrates, finfish, birds, marine mammals, terrestrial and coastal habitats and fauna, sea turtles, wetlands and other waters of the United States, commercial fisheries and for-hire recreational fishing, cultural resources, demographics, employment, economics, environmental justice, land use and coastal infrastructure, navigation and vessel traffic, other marine uses, recreation and tourism, and visual resources."

While this DEIS has detailed many of these impacts, it has also inferred that these impacts are minimal and the show must go on. These conclusions are at best highly irresponsible and at worst, highly illegal as they allow for the "Takes", over the scope of all the projects slated for the east coast, of over 2000 individuals of endangered species, protected by the Marine Mammal Protection Act. These authorized Takes include 130% of the North Atlantic Right Whale population, 146% of the coastal bottlenose dolphin, 88% of the east coast humpback whale population and over 50% of ALL seals on the east coast. The list goes on and on.

In March of 2023 NOAA published the technical memorandum entitled Fisheries and Offshore Wind Interactions: Synthesis of Science

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

- ☐ 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
 - Clarification on the balance of attraction/production/ecological trap
 - Upscaling of locally observed effects to the regional scale (i.e., demersal, or ground fish stock size)
 - Impacts on spawning and nursery ground quality with regard to habitat change
 - Trophic, or feeding and nutrition interactions
 - Quality of epifaunal, or benthic organisms as food for fish and subsequent levels
 - Seasonal noise effects on fish at appropriate life history stages
 - Information on the ability of animals to evade noise
 - Consideration of noise attenuation and distance from source in assessments of effects
 - Effects of pile-driving noise and operational noise were identified as priority knowledge gaps although cumulative effects of other noise sources also require attention
 - Sensitivity ranges for species of interest with regard to OSW EMF intensities and

types

- 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
- Knowledge of migratory delays resulting from EMF encounters and any ecological consequences in the context of species/life stage-specific migration
- Knowledge of the ability of species to derive ecologically important cues in the presence of cable EMFs (and consideration of life stage)
- Determination and quantification of distorted predator-prey interactions and consequences for energy acquisition (for predators) or survival (for prey)
- Potential effects on sessile life stages (e.g., eggs which may be exposed to variable EMFs over longer periods)
- Consideration of stratification and altered hydrodynamics on species at appropriate scales, such as the influence on connectivity, larval transport, and recruitment
- Generational effect of energy emissions (noise and EMF)
- Early life stage effects of energy emissions on later life stages
- Consideration of multimodal stressors
- Consideration of cumulative effects rather than individual pressures
- Species-specific spillover rates

So my second comment is actually more of a question: Since the publication of this NOAA memorandum in March of this year, in the past 3 months, what studies have occurred to close these knowledge gaps such that this Environmental Impact Statement actually contains meaningful scientific content?

It is clear that the intention is to move forward with construction despite the poor quality of this EIS which ignores the knowledge gaps and defines most known detrimental impacts as “minimal”. This is not only irresponsible, it breaks the law.