



October 15, 2024

The Jersey Shore Partnership (JSP)

**Docket # :** [QO23100719-](#)

**Case Caption :** IN THE MATTER OF THE OPENING OF A SOLICITATION FOR A TRANSMISSION INFRASTRUCTURE PROJECT TO SUPPORT NEW JERSEY'S OFFSHORE WIND PUBLIC POLICY

The Jersey Shore Partnership (**JSP**) welcomes the opportunity to comment **TRANSMISSION INFRASTRUCTURE PROJECT TO SUPPORT NEW JERSEY'S OFFSHORE WIND PUBLIC POLICY** *Docket Number* [QO23100719](#)

JSP is a New Jersey not-for-profit non-partisan organization that advocates for stable funding on the state and federal levels for coastal protection and beach replenishment, and on related issues and initiatives that are important to the State's Coastal communities, the tourism economy, and our quality of life. In 1992, JSP successfully advocated for the enactment of an annual \$15 million (now \$25 million) dedicated Shore Protection Fund, the first such legislation to be passed in the nation, to provide the local cost share for federal shore protection projects.

The Jersey Shore Partnership continues to raise awareness among state and federal officials and the public as to the need for safeguarding the shoreline through beach restoration and other shore protection methods, **including safeguarding the sand resources needed to continue to maintain the 127-mile-long New Jersey shoreline into the future.** With sea level rise and the threat of increasing extreme weather, it is likely that nourishment will be required more frequently and in greater volumes in the future. Access to sediment resources will only become more critical.

**Access to sand is a critical issue to the future of our Jersey Shore coastal beaches, the infrastructure they protect, and the economy they support.** The Jersey Shore Partnership's immediate concern is avoiding conflicting uses of sand resource areas for offshore export cable corridors (**OECCs**) designed to transmit power to the rapidly developing wind power industry along the New Jersey coast. They include proven, potential, and unverified sand resources.

The Jersey Shore Partnership respectfully requests prioritizing research on the impacts of Off Shore Wind (**OSW**) energy development *on the seafloor, in particular*, related to the impact of OSW development on proven, potential, and unverified sand resources for beach replenishment for current and future projects.

The North Atlantic Regional Assessment of the National Shoreline Management Study<sup>1</sup>, published by the Institute of Water Resources in March 2022, identified that, since the 1990s, the US Army Corps of Engineers (USACE) has invested heavily in beach nourishment for Coastal Storm Risk Management (CSRM). USACE has constructed over 250 miles of CSRM projects with beach nourishment components, primarily in the Mid-Atlantic region, reflective of the region's desire to provide storm protection by restoring natural coastal lands and habitat rather than using hard structures such as seawalls. Many projects rely on offshore sand from the continental shelf. Resource agencies and environmental interest groups have long raised concerns about the long-term sustainability of these efforts as these resources become scarcer in the future.

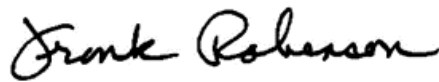
New Jersey is not immune from the potential lack of sand resources for future shore protection projects. New Jersey has already placed 208.5 million cubic yards of material along the state's shoreline between 1936 and 2020<sup>2</sup>. Sea level rise combined with a projected increasing frequency and intensity of coastal storms will further reduce our limited sand resources. **It is crucial that the Board of Public Utilities (BPU) prioritize the impact of offshore wind (OSW) energy projects on proven, potential, and unverified sand resources. This focus should aim to minimize conflicting uses and mitigate the rising costs of dredging, which are driven by the Offshore Export Cable Corridor (OECC) and the challenges of locating sand resources.**

Thank you for your consideration, and we welcome the opportunity for further discussion.

Sincerely,



John E. Gagliano  
Chairman



Frank Robinson  
President



Grace Hanlon  
Executive Director

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<sup>1</sup> [IWR Libraries \(iwrlibrary.us\)](http://iwrlibrary.us)

<sup>2</sup> <https://gim2.aptim.com/ASBPANationwideRenourishment/>