

BHTA Response to Taxpayer's Concern Related to Atlantic Shores Offshore Wind Project Flaws and Alternative

Thank you so much for engaging the Beach Haven Taxpayer's Association on this very complex matter. First, BHTA has never publicly supported the current location of COMMERCIAL LEASE OCS A0499 but in October 2021, we commented on the draft Environmental Impact Statement (EIS) for the review of a construction operation plan (COP) submitted by Atlantic Shores Offshore Wind LLC (Atlantic Shores). As such, our comments and support of the COP at that time focused on considerations surrounding visual and scenic impacts, tourism, and property resources since said issues most directly impact our membership. We, in fact, urged BOEM to lead with science and peer reviewed and nothing at all and to confirm or refute our findings. At the time we offered our comments, Hudson South was not an option by BOEM.

Regarding visibility, visibility calculated from Rutgers University Weather Research Forecasting model data indicate a visibility frequency of 1 out of 4 or 5 days (23%) for "very clear days" in the summer. "Very clear days" are defined by visibilities above 20 miles throughout the majority of the onshore and offshore environment in New Jersey. A majority of summer days have high inland visibility and lower visibility (2-12 miles) over the ocean. BHTA concluded that on the majority of summer days where visibility extends 2 to 12 miles over the ocean, the wind turbine area (located at 13.5 miles from Beach Haven) would be outside of view. The same conclusions were reached by Environmental Design and Research, a landscape architect and engineering firm. Please refer to <https://vimeo.com/577181478/a2a5e49788>.

Regarding cost, When BHTA questioned NJBPU on the average monthly residential cost increase of \$2.11, the response was this was a present value estimate once electricity is produced because of the Proposed Action.

BHTA was the first group to hold an independent balanced hearing on this subject. In March 2021, we moderated a panel discussion made up of representatives from academia, commercial and recreational fishing industries, a representative from ReClam the Bay and Atlantic Shores. To continue our balanced approach, we interviewed Ms. Karen Conover, who professionally has over 30 years of implementing offshore wind projects in Europe and the Americas. We recorded both sessions which you will find on our website. I would venture to add, our website is one of the most comprehensive websites on this topic.

The Final Environmental Impact Statement on lease A0499 will be issued later this year, and we will be commenting on all the issues you raised just like the public, at large. At the time we issued our comments on the draft EIS, Atlantic Shores was not awarded the bid for the Hudson South Lease Area. Now it has.

In fact, BHTA questioned BOEM about the process of moving the current lessee to Hudson South, BOEM has indicated on May 17th 2021 that “in order for a current lessee offshore New Jersey (OCS-A 0498 – Ocean Wind LLC) and (OCS-A 0499 – Atlantic Shores Offshore Wind, LLC), to move their proposed project to a potential lease area in the New York Bight (Hudson South), the lessee(s) would first need to win the rights to a lease area in the New York Bight auction”. Atlantic Shores has done just that. BOEM indicated that “even if the lessees were to win those rights at auction they would still retain their existing leases (OCS -A 0498 and OCS- A0499) **unless the Lessee chooses to relinquish the lease**. Those existing leases allow a lessee to submit a Construction and Operations Plan (COP) for a wind facility in the leases described geographic extent. For all proposed wind facilities, including those offshore in New Jersey and in the New York Bight, BOEM would conduct an environmental impact statement which will analyze the impact of the proposed project on environmental and socioeconomic resources. After completion of the environmental review BOEM would approve, disapprove or approve the COP with modifications”. To date, the due date of this COP for Atlantic Shores has yet to be established.

To the best of our knowledge, BOEM response was the first response anyone has received related to an alternative of a lease that would be further removed from the shoreline. This would refute a claim that BHTA never considered or supported an alternative.

Please note that by moving the turbines, a lessee still needs to comply with the lease areas that were up for sale and awarded to the bidders. You cannot simply stack leases or bunch leases together, and displace fishing grounds.

The other issues you raised related to the North Atlantic right whale's migration, humpback whales, and piper plover bird population will be addressed in the Final EIP. I direct you to the Joint Council Taxpayers Association Offshore Round-up #2 which appears on our website that points you to the direction of science. One conclusion, however, is that more reliance on fossil fuels harms the whale populations you cited. Our letter to BOEM in October 2021 was concerned about sea level rise, and climate change. Not only does climate change impact property values, but it also has a negative impact on our commercial and recreational fishing industries, and our ecological and environmental systems including marine life and birds. BHTA believes projects such as the proposed action are critical in combating climate change, but should be watched and studied carefully.

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