



Save Long Beach Island  
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[www.SaveLBI.org](http://www.SaveLBI.org)

**Providing for the Migration of the North Atlantic right whale**

through a Petition Filed by Save LBI, Inc. to Designate an East Coast Migration Corridor for it as Critical Habitat, Prohibit the Siting of Wind Complexes Within It, and Other Actions.

Dear Colleagues and Supporters,

The actions called for in the Save Long Beach Island (LBI) Inc. petition described below will prevent the obstruction of the essential migration of the critically endangered North Atlantic right whale by wind turbine presence in its path.

The North Atlantic right whale (NARW) is one of the largest and longest living animals on earth. It is now critically endangered and depends on an annual migration along the East Coast—from calving grounds in the South to feeding grounds in the North—for its survival. All efforts to date have not reversed its decline.

The NARW now faces a new, greater and ominous threat from the operating noise from numerous proposed offshore wind turbine complexes in its path, which will obstruct and potentially block that migration. Without a protected migration corridor and a prohibition on wind complexes in its path, the North Atlantic right whale will not survive. Projects like Atlantic Shores South and North off New Jersey are sited directly across the whale's migratory path, as are others along the Coast, and would seal its extinction unless we act.

Currently, two critical habitat areas exist for the NARW, one off New England (for feeding), and one off Georgia and South Carolina (for calving). But no habitat protections exist for the migration corridor between them—a vital "missing link" essential for the whale's survival.

On March 31, 2025, Save LBI filed a 234-page petition with the U.S. Departments of Commerce and Interior, which house the National Marine Fisheries Service (NMFS) and the Bureau of Ocean Energy Management (BOEM) respectively. It delineates the primary historic migration corridor of the whale in Enclosure 1 and presents noise calculations in the petition's Enclosure 2 showing that the operation of modern wind complexes within that corridor will obstruct and potentially block the whale's migration. To prevent that, the petition asks to designate that corridor as critical habitat and prohibit offshore wind development within it. Our data show that nearly 80 percent of NARW deaths between 2000–2020 occurred within this proposed corridor—despite vessel speed restriction zones in place since 2008.

For centuries, humans have failed the NARW—first through near-eradication from whaling, and more recently through misguided narratives downplaying the risk of offshore wind projects. NMFS and BOEM have approved wind projects based on flawed assumptions that significantly underestimate the noise impact to the whale. Major environmental organizations that would strongly protest similar actual impacts from oil and gas development remain silent or supportive, apparently mistakenly believing that offshore wind development offers discernible climate benefits. University researchers who once voiced concern now appear content to pursue their

grant-funded projects. As a result, the responsibility to act falls to us, and to other groups and persons who care.

This petition would establish a safe migration path for the whale and implement turbine restrictions that are crucial to preventing its extinction. It addresses requirements under the Endangered Species Act, the Marine Mammal Protection Act and the Outer Continental Shelf Lands Act implemented by the Commerce and Interior Departments. It therefore asks both Agencies **to do all the following**;

1. To pursue a joint formal rulemaking to:

- **Designate a Migratory Critical Habitat Corridor for the NARW from Maine to Georgia (see Petition Enclosure 1, Table 2, and below).**
- **Prohibit New Offshore Wind Projects within the Designated Corridor and a Buffer Zone of 7 miles outside it for the Noise from the Wind Complex to Drop Below the Whale's Disturbance Level.**
- **Establish a Dedicated fund to Offset Any Costs that May Occur Indirectly due to the Designation, and**
- **To Take Further Actions Consistent with a Critical Habitat Designation, Including Lease Cancellations as justified in Enclosure 3 and Reinitiating Endangered Species Act Section 7(a)(2) Consultations, where, based on rule criteria, the designated habitat "may be affected" by a project.**

2. Pending the rulemaking outcome, in order to Preserve the Proposed Migration Corridor for a Critical Habitat Designation and Protect the Whale, to;

- **Pause all Turbine Placement within the Proposed Corridor and the Buffer Zone, e.g., the Empire Wind 1 project,**
- **Suspend all High Resolution Geophysical Vessel Surveying in the Proposed Corridor During the NARW Migration Season, and**
- **Reinitiate Endangered Species Act Section 7(a) Consultations based on the rule criteria involving "new information revealing effects not previously considered". See Petition Enclosure 4 showing Major Systemic Underestimates in the NARW "Take Number" Estimates used to approve the Atlantic Shores South Project and other projects using the Same Calculation Methods.**

The petition provides a sensible approach to protecting the right whale from extinction, while restricting wind turbines from places where they obviously do not belong, and other benefits. Because the proposed migration corridor is relatively close to shore, the turbine prohibitions would also protect shore tourism industries, and avoid interference with our land-based air-defense radar systems.

Nevertheless this initiative is bold and may spark controversy.

Despite the protection afforded to a critically endangered whale, some mainstream environmental groups may not support the turbine siting restrictions.

This initiative would preserve millions of ocean acres for fishing and vessel navigation purposes that would become unavailable with wind turbine presence. Nevertheless, some fishing and shipping interests may be concerned that the designation would portend additional restrictions

and cost to them. The authority to impose those already exists, and each would still require independent justification. But to address those concerns, the petition includes a proposal to defray any such costs from a general taxpayer fund, and not be borne by specific industries, because the whale is a national treasure.

There will be interest in this, pro and con. **But if we as a society want to save this species from extinction, this designation is necessary.** Without a protected migration corridor the NARW will not survive. Fishing regulations and vessel speed limits have not been effective. We cannot allow this new and greater industrial threat to seal its fate.

We are urging the Departments of Interior and Commerce to take ownership of this effort, and look forward to a positive decision by them within the required 90 days to pursue the joint rulemaking.

Your feedback is welcome. To support this initiative, please contact the White House and the following officials, and ask other like-minded persons and organizations to do the same. Contact information is listed below.

The White House  
1600 Pennsylvania Ave NW  
Washington, DC 20500  
[whitehouse.gov/contact](http://whitehouse.gov/contact)

Douglas Burgum, Secretary  
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Howard Lutnick, Secretary  
U.S. Department of Commerce  
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Thank you.

Bob Stern, President  
Save LBI  
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**Proposed Migratory Critical Habitat Corridor**

<b>State</b>	<b>Proposed Migratory Critical Habitat-Primary Inner Historical Corridor(miles offshore)</b>
<b>Maine</b>	<b>14-34</b>
<b>New Hampshire</b>	<b>6-39</b>
<b>Massachusetts/from Cape Cod</b>	<b>6-31</b>
<b>Rhode Island</b>	<b>6-16</b>
<b>New York/from Long Island</b>	<b>6-47</b>
<b>New Jersey/from Barrier Islands</b>	<b>6-33</b>
<b>Delaware/Maryland</b>	<b>10-31</b>
<b>Virginia</b>	<b>6-34</b>
<b>North Carolina/Mainland</b>	<b>6-31</b>
<b>South Carolina</b>	<b>6-23</b>
<b>Georgia</b>	<b>6-27</b>