Save Long Beach Island, Inc.
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July 20,2026

Jason Roberts,
Duke University Marine Geospatial Ecology Laboratory
A328 Levine Research Center
Nicholas School of the Environment
Duke University
Durham, North Carolina 27708

Dear Mr. Roberts,

I am currently President of Save Long Beach Island, Incorporated, organization that has concerns with the Atlantic Shores South wind project proposed off the Island. I have background in applied mathematics and aeronautical engineering, and in a former life managed the environmental impact studies for the U.S. Department of Energy in Washington, D.C.

Accordingly, I believe I have sufficient technical knowledge and experience with environmental impact studies and have delved extensively into the noise exposure modeling reports that have been used to support project approval, in particular on the impact to the North Atlantic right whale (NARW) as it migrates off the southern New Jersey coast, where the project is located, approximately 9 to 20 miles out.

We believe that those impacts have been systematically underestimated through a variety of unsupported assumptions regarding noise source level, transmission loss factors and acceptable noise levels. So, we were naturally concerned when we saw the NARW densities being used for those analyses reduced abruptly by a factor of one-ninth in an Update Memorandum to NOAA from Jasco Applied Sciences of June 21, 2023 as shown by the first two rows in the enclosed table.

This reduction was attributed to revisions made between Version 11.1 and Version 12 of your density models. We do observe a dramatic change in the mapped densities for southern New Jersey during the principal migration period of January through April, with the predicted concentrations shifting farther offshore.

We understand that the Laboratory made adjustments to the density patterns, based on-as far as we can tell-increased observations of whale presence off Eastern Long Island and New England.

We are uncertain, however, how those observations (presumably reflecting a combination of migration and overwintering whales) justify a shift in the predicted migration corridor off southern New Jersey. Based on the detection data that we see, we can find no support for a major shift in the migration pattern of the whale off southern New Jersey and south to Virginia (see arrows on enclosed maps) from closer-in to farther out.

As shown in the enclosed slides, the Whale Map data from 2011 to 2020 provides limited detections of the NARW, but still more close-in than farther out.

More recent, robust and reliable detection data from the Whale Map from 2021 to 2026 shows a preponderance of whale presence from January through April still closer in, with some activity farther out.

An aerial survey conducted by the New Jersey Department of Environmental Protection (NJDEP) for the migration period of 2023/2024 shows the same pattern with most of the detections still being closer in.

Likewise, Slocum glider sweeps close-in and farther out performed by Woods Hole in the winter of 2021/2022 showed a limited number of detections closer-in, but not farther out. Subsequent surveys showed a limited number of detections but more balanced between closer in and farther out.

Additionally, regarding food source shifts as a reason for a farther out migration, we see evidence of cross-shelf export of plankton during specific oceanographic events, but can find no study demonstrating a statistically significant long-term offshore displacement of mesoplankton abundance farther off New Jersey.

Collectively therefore, the detection data does not support a dramatic shift in the migration of the NARW from closer-in to farther out.

We recognize that the Version 12 model is a predictive tool based on a variety of ocean and animal characteristics, and not strictly tethered to whale detection data. But it seems that when those predictions diverge significantly from the actual detection data, revisions to the model would be called for.

Therefore, we would appreciate any insight you could provide regarding the basis for the dramatic shift in the migration pattern off southern New Jersey (and further south to Virginia). Conversely, If you find that that density shift is not well-supported by actual detection data, we would ask you to consider an alteration of the density maps for those limited areas.

If a Zoom call would be a more efficient way to address these questions, we would be happy to accommodate your schedule.

If you or your staff want a briefing on the underestimates to NARW impact that we perceive from other factors, and why these density numbers are so important to an accurate prediction of harm, we would be glad to provide that as well.

Thank you for considering.

Sincerely,

Bob Stern

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Enclosures: Slides Regarding NARW Detections

Density: Right Whale Migration- from Atlantic Shores Incidental Take Application for Construction

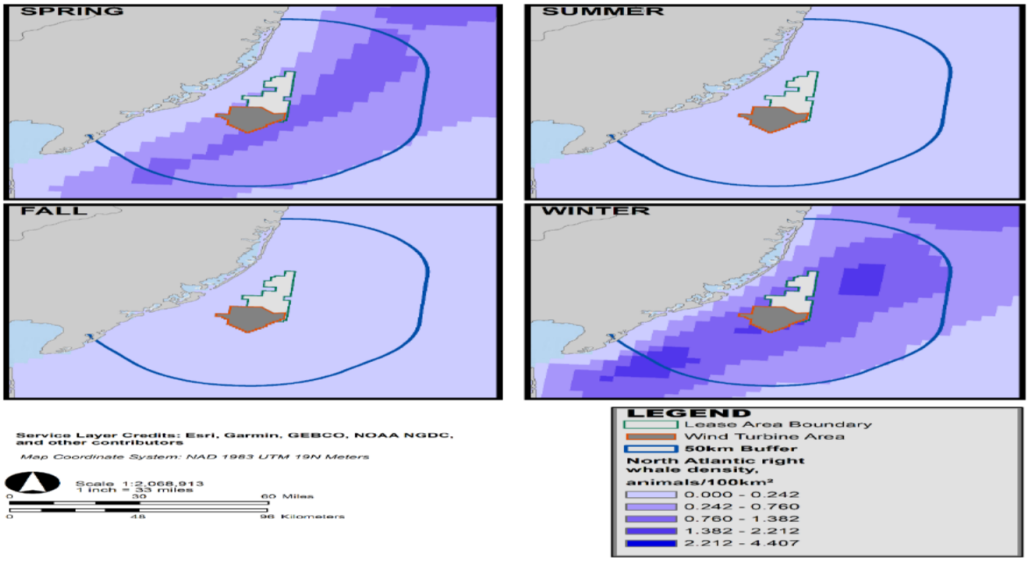
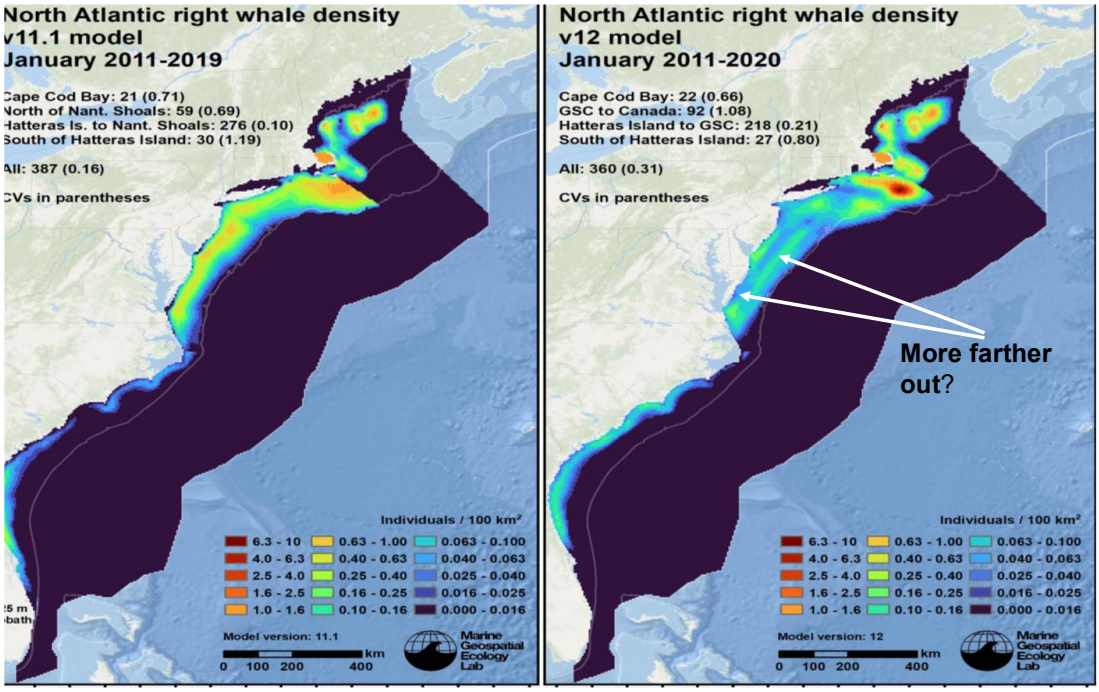


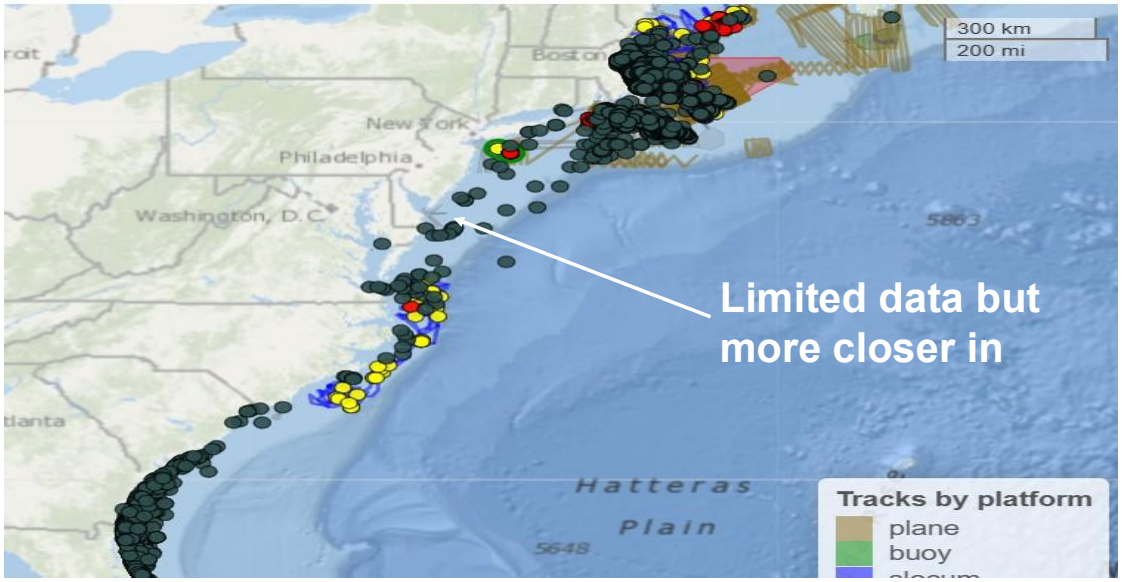
Figure 9. North Atlantic right whale maximum seasonal density from Roberts et al. (2016a, 2021a, 2021b).

NARW Densities in Lease Area (animals/100 km ^{2})

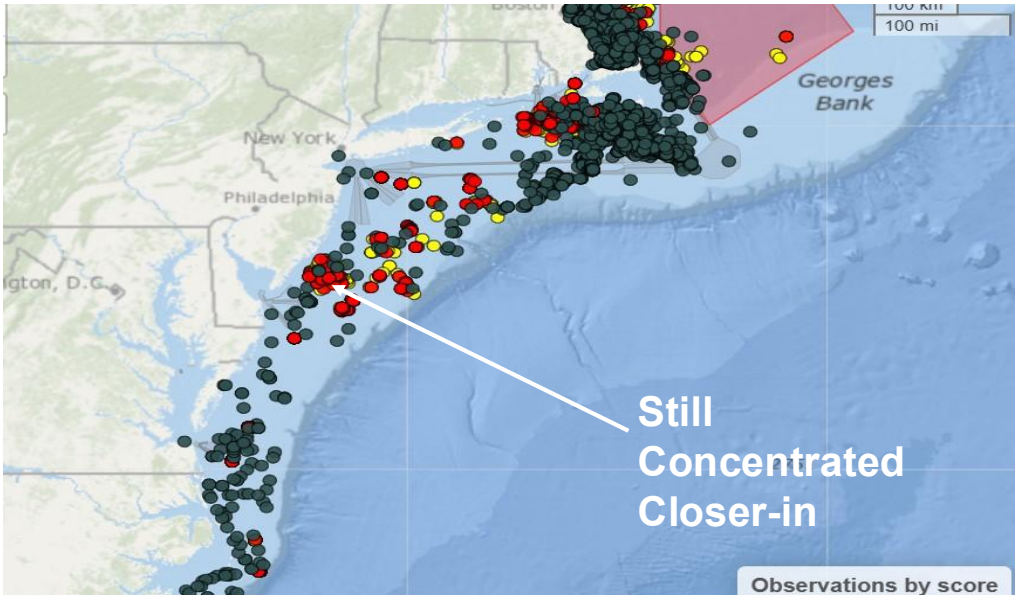
	Dec	Jan	Feb	Mar	Apr
Initial Densities, Duke Version 11.1	0.275	0.562	0.628	0.685	0.607
New Densities, Jasco, 6/2023, used for BiOP, based on Duke Version 12?	0.042	0.069	0.074	0.062	0.046
Duke Version 12 Density Maps	0.21	0.21	0.21	0.12	0.033



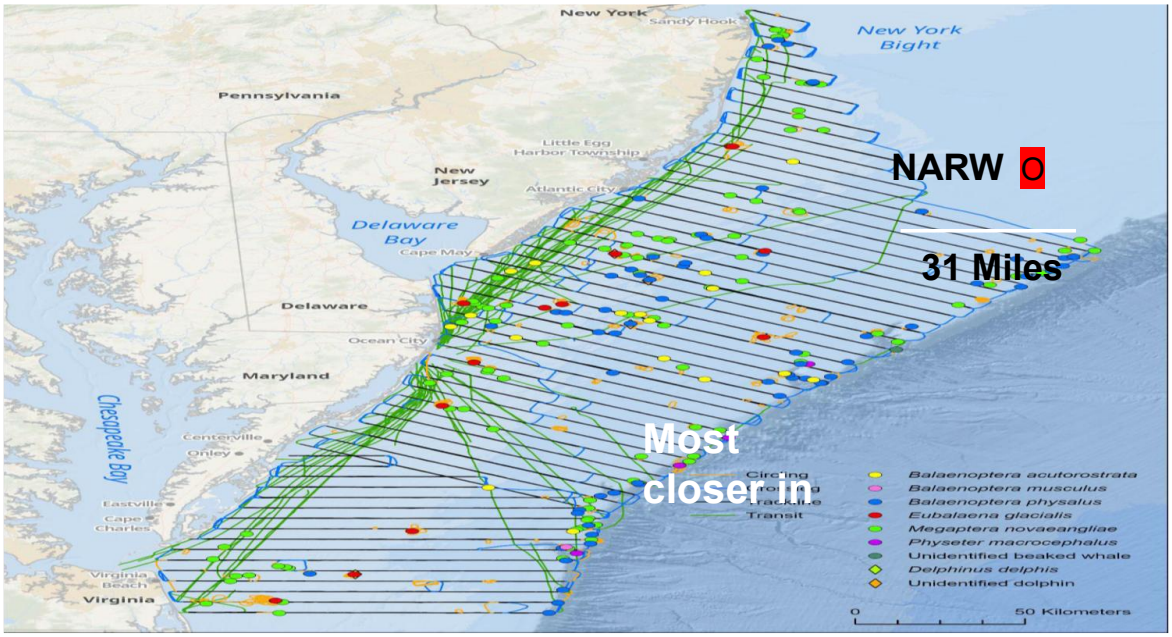
Whale Map, January through April, 2011 to 2020



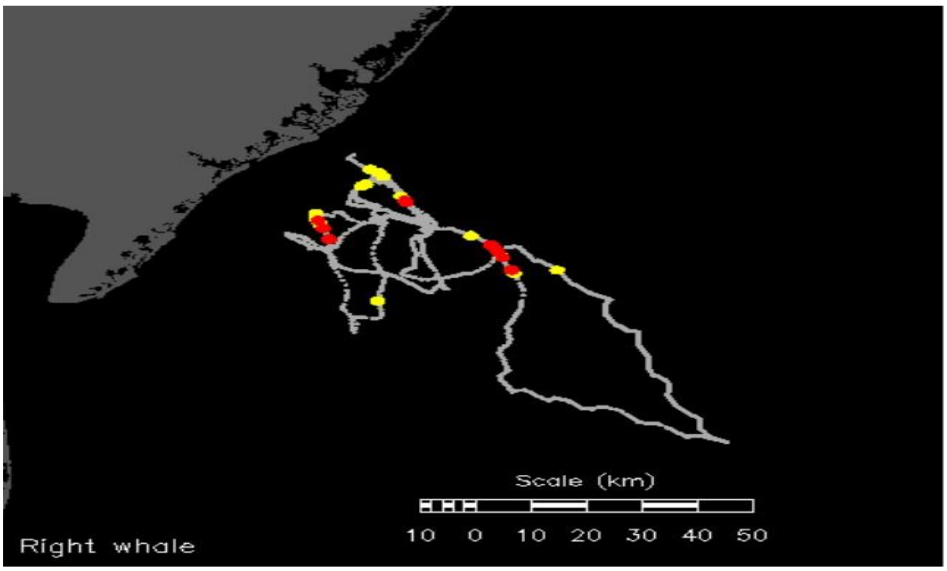
Whale Map, January through April, 2021 to 2026



New Jersey DEP Aerial Survey, 12/7/2024 -04/01/2025



Slocum Glider Detections, South Jersey, Winter, 2021/2022



Most close in, not farther out

Subsequent surveys mixed

NARW Densities Too Low

Version 12 migration shift from closer-in to farther out off South Jersey not supported by detections from 2010 to 2026.

BiOP densities closer-in are a fraction of the lower Version 12 densities; 1/5 in December, 1/3 in Jan & Feb.

Reduction of NARW density by 1/9 th closer-in off South Jersey not supported.