

BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

In re:)	
Atlantic Shores Offshore)	
Wind, LLC, for the)	
Atlantic Shores Project 1)	
And Project 2)	Appeal No. OCS 24-01
)	
EPA Permit No. OCS-EPA-R2 NJ 02)	
)	

UNOPPOSED MOTION TO SET SCHEDULE FOR CONSOLIDATED REPLY

Atlantic Shores Offshore Wind, LLC and Atlantic Shores Offshore Wind Project 1, LLC (“Atlantic Shores”) respectfully requests that the Environmental Appeals Board (“EAB”) set a schedule for Atlantic Shores to file a Consolidated Reply in Support of its Motion for Reconsideration in the above-captioned matter. *See* 40 C.F.R. § 124.19(f). Atlantic Shores proposes to file a Consolidated Reply on or before April 10, 2025. Atlantic Shores seeks this schedule to provide clarity regarding its filing of a Consolidated Reply, as described below.

Atlantic Shores filed a Motion for Reconsideration on March 24, 2025. Petitioner Save Long Beach Island, Inc. (“SLBI”) filed its Response to the Motion for Reconsideration on March 31, 2025. Currently, Atlantic Shores must file its Reply to Petitioner SLBI’s Response by April 10, 2025. *See* 40 C.F.R. § 124.19(f)(4) (providing 10 days to file reply brief in motions practice). Today, on April 3, 2025, the U.S. Environmental Protection Agency (“EPA”) Region 2 filed its Response to the Motion for Reconsideration. Atlantic Shores’ Reply to EPA Region 2’s Response is thus due 10 days from today. *See id.*

To avoid redundancy and inefficiency in filing separate replies at different times to Petitioner SLBI’s Response and to EPA Region 2’s Response, Atlantic Shores proposes to file a

Consolidated Reply to both Responses on or before April 10, 2025—which is the current deadline to respond to Petitioner SLBI’s Response and is five business days following EPA Region 2’s Response.

Consistent with the spirit of 40 C.F.R. § 124.19(f)(2), counsel for Atlantic Shores conferred with both counsel for Petitioner SLBI and counsel for EPA Region 2, and neither party objects to nor opposes this request.

For the reasons stated above, Atlantic Shores respectfully requests that the EAB set a schedule for Atlantic Shores to file a Consolidated Reply in Support of the Motion for Reconsideration on or before April 10, 2025.

Date: April 3, 2025

Respectfully submitted,

/s/ Hilary Tompkins

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STATEMENT OF COMPLIANCE WITH WORD COUNT

I hereby certify that Atlantic Shores Offshore Wind, LLC's Unopposed Motion to Set Schedule for Consolidated Reply contains 325 words, as calculated using Microsoft Word word-processing software.

/s/ Hayley Fink
Hayley Fink (D.C. Bar No. 1028709)

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Atlantic Shores Offshore Wind, LLC's Unopposed Motion to Set Schedule for Consolidated Reply was electronically filed with the Clerk of the Environmental Appeals Board using the EAB eFiling System, and was served via electronic mail on:

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