

Addendum

South Fork Wind

CRMC Staff Summary and Recommendations

Federal Consistency – CRMC File 2018-10-082

CRMC staff issued the Staff Summary and Recommendation on Friday, May 21, 2021 and it was posted to the CRMC website in advance of the Council meeting scheduled for Tuesday, May 25, 2021 in this matter. One of the primary goals of the Ocean SAMP is that proposed activities shall be designed to avoid impacts and, where unavoidable impacts may occur those impacts shall be minimized and mitigated. See 650-RICR-20-05-11.9.1(A). Given the minimum and maximum project design parameters as detailed within the South Fork Construction and Operation Plan (COP), CRMC staff concluded that the proposed project could be further minimized to avoid impact to the coastal resources, in particular glacial moraine, by use of the largest wind turbine option within the COP, which would reduce the overall number of turbine foundations necessary to meet the purpose and need of the South Fork project. The COP provides a range of design parameters with a minimum of 11 up to a maximum of 15 turbine foundations, and a minimum of 6 up to a maximum of 12 megawatt (MW) wind turbine generators.

CRMC staff based its project minimization alternative on use of the 12 MW wind turbine generator. However, CRMC staff just became aware that the SFW project developer had previously entered into a contract for delivery of 11 MW wind turbine generators. Consequently, 12 turbine foundations are necessary to meet the purpose and need of the proposed project to deliver 130 MW of renewable wind energy as contractually obligated by South Fork Wind, LLC to the Long Island Power Authority. Given this information, a project minimization alternative consisting of 11 MW wind turbine generators and no more than 12 turbine foundations would demonstrate that “all feasible efforts have been made to avoid damage” to the glacial moraine (Areas of Particular Concern) resources and values as required by the enforceable policy at 650-RICR-20-05-11.10.2(B).

Recommendation

1. CRMC staff recommend a “Conditional Concurrence” pursuant to the federal consistency regulations at 15 C.F.R. 930.4 that includes a mitigation package which consists of the revised proposed project minimization alternative with a maximum of twelve (12) turbine foundations using the 11 MW turbine generator and the \$12 million compensatory mitigation offered by the developer. In consideration of the revised project minimization alternative and compensatory mitigation combined with all other proposed mitigation elements CRMC staff conclude that the South Fork project meets the enforceable policies of the Ocean SAMP and the Rhode Island coastal program.