



*Rhode Island*  
**SALTWATER  
ANGLERS  
Association**



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October 17, 2022

Bureau of Ocean Energy Management  
(Sent via website: [regulations.gov](https://www.regulations.gov))

Re: Docket No. BOEM-2022-0045- Revolution Wind, LLC

The Rhode Island Saltwater Anglers Association (RISAA) represents over 7,500 recreational anglers and 28 affiliate clubs in Rhode Island, Connecticut and Massachusetts. We have been active participants in Ocean Planning activities from the start of the Ocean Special Area Management Plan (OSAMP) in 2008. RISAA is submitting this letter regarding the proposed project to express our interest and concern. Our enclosed comments are not complete due to the extensive nature of the materials already available such as the over 1600 pages of Draft Environmental Impact Statement with Appendices and the 151 page Fisheries Research and Monitoring Plan dated October 2021 and our limited ability to conduct a complete technical review. We ask that any comment period regarding this project remain open for an extended time (at least 6 months) to allow RISAA and other fisheries representatives to spend more time reviewing the extensive amount of technical materials.

We are very concerned with the speed that the Ocean that we use for fishing is being changed by activities related to the installation of wind turbines. Our members are reporting changes in the area surrounding the Block Island Wind Farm's 5 turbines and, in the areas, further to the south and east where geophysical surveys are being conducted prior to actual turbine construction.

The proposed Revolution Wind project location and the location of the export cable includes many areas where our members routinely fish for cod, summer flounder, striped bass, tuna, sharks and many other species critically important to the economy of Rhode Island recreational fishing. We are particularly concerned that, due to unreasonable political pressure, this project will be permitted to move forward without proper consideration of ecological and fisheries impacts especially in light of the recent history of uncontrolled permitting of the South Fork Wind project on Cox Ledge in areas specifically noted by the OSAMP as Areas of Particular Concern because they are glacial moraines.

We believe that the DEIS fails to identify the extent of recreational fishing, either in the form of "for-hire" or private boat fishing in the area of the turbines or along the cable route and therefore does not assess the potential impacts to recreational fishing. The Revolution Wind

DEIS also fails to address OSAMP Areas of Particular Concern including moraines and is also located closer to ports used by RI recreational fishers and includes major disturbance into Narragansett Bay because of the proposed placement of the Export Cable.

We believe that all disturbance inside of the COLREG line should be conducted during winter months to minimize impacts on the extensive use of this entire area by recreational fishing interests. Potential short & long term impacts due to resuspension of toxic materials and turbidity increase must be assessed in detail. In addition, a preliminary review of the Fisheries Research and Monitoring Plan dated October 2021 identifies no plan for sampling using techniques employed by recreational fishing. As RISAA has commented for many years, this Plan must be expanded to include fisheries sampling using rod and reel surveys before, during, and after construction both in the turbine area and in the area planned for the export cable. In addition, a significant effort must be made to determine the value of recreational fishing in both of these areas. This project must not be allowed to continue the fallacy established by South Fork Wind that just because there are not good data quantifying the value of recreational fishing in some areas, then recreational fishing does not exist and is worthless. The proponents of this project have a responsibility to quantify the importance and value of existing recreational fishing through observation, survey, interviews, data review and whatever other methods are available prior to drafting any Impact Study on this proposed project. It is not acceptable to just say that recreational fishing does not exist, because it does exist and it is important to the RI economy and the livelihood of thousands of Rhode Islanders and it will be impacted by the proposed project.

Sincerely,



Greg Vespe, Executive Director



Richard Hittinger, 1<sup>st</sup> Vice President

Cc (via email): RICRMC, Senator Whitehouse, Senator Reed, Representative Langevin, Representative Cicilline, NOAA, ROSA