



State of Rhode Island  
**Coastal Resources Management Council**  
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## MEMORANDUM

Date: November 1, 2022

To: Jeffrey Willis, CRMC Executive Director

From: Justin Wolf Skenyon, Principle Ocean Engineer

Subject: 2021-07-005 Revolution Wind / Staff Report (dated 10/18/2022)

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In response to continued communications with Ørsted personnel, CRMC Staff is suggested the following refinements and/or additional explanations regarding the staff recommended stipulations as contained in the staff report for the application 2021-07-005 Revolution Wind

1. Cable burial depth is defined in the staff report as a minimum depth range of four (4) to six (6) feet. As stated in the report, CRMC Staff advocates for an optimum cable burial depth of at least six (6), as impacts to coastal resources could be limited with deeper cable burial, and the need for secondary cable protection is minimized. While four (4) to six (6) feet is the minimum target, this measurement is not a limiting standard where additional depth is achievable.
2. In reference to page 17 of the staff report on **Cable Route Surveys**, staff advocates for the removal of the requirement for a survey after a 10-year storm event and add language to the stipulation **Cable Inspection Long-term Monitoring Plan** on page 18 to require that the plan include details for the export cable route surveying to occur following a severe weather event. This language change will simplify the process and increase staff's ability to oversee post-construction surveys.
3. Staff report stipulation **Historic and Archaeological Preservation Memorandum** (page 20) - staff advocates for the removal of the requirement that the final Memorandums of Agreement (MOA) as part of the federal Section 106 process be issued prior to assent. CRMC will defer to RIHPHC and the Tribes in their capacities as consulting parties in the federal Section 106 process. The applicant has already submitted an archeological survey to RIHPHC which has issued a letter of "no objection" to the CRMC issuing a permit. It is staff's opinion that such a signoff from HPHC meets the regulatory standard while still upholding the regulatory standard.
4. In the staff report stipulation **Cable Inspection Long-term Monitoring Plan** on page 18, staff advocates for the removal of the sub-bottom profiler (chirp) system with the possible use of a side scan sonar. Both systems would meet the same requirements for the plan and only one is needed.
5. Staff received public comments from the Rhode Island Saltwater Anglers Association and two letters from aquaculture leaseholders after the initial release of the staff report. RISAA outlines concerns about the impacts to the environment and has requested an extension of the comment period for an additional six months. The aquaculture leaseholders raised concerns about potential impacts to their sites due to sediment displacement Staff would like to clarify that the average sediment displacement from the cable-laying process is estimated to be a maximum of one-sixteenth (1/16) of an inch. Seabed preparation activities and excavation of the HDD exit puts are estimated to be a maximum of 3.1 inches. Unlike the cable-laying process, these activities will occur periodically and in single instances along the cable route.