

**Brittany Spurlock**

2021-06-029

**From:** David Ciochetto <dciochetto@crmc.ri.gov>  
**Sent:** Tuesday, May 9, 2023 9:14 AM  
**To:** Brittany Spurlock  
**Cc:** David Ciochetto; Lisa Turner; Laura Dwyer  
**Subject:** Fwd: comment  
**Attachments:** image001.jpg; Untitled attachment 00228.htm; image002.jpg; Untitled attachment 00231.htm; image003.jpg; Untitled attachment 00234.htm; image004.jpg; Untitled attachment 00237.htm; image005.jpg; Untitled attachment 00240.htm; The Town Dock-Revolution Wind-CRMC.pdf; Untitled attachment 00243.htm

Hi Brit,

I just wanted to make sure you also got these and they get up onto the councils packet.

Best Regards,

David Ciochetto

Principal Ocean Engineer

Offshore Wind Energy

State of Rhode Island (SoRI)

Coastal Resources Management Council (CRMC)

Oliver H .Stedman Government Center

4808 Tower Hill Road, Suite 116

Wakefield, RI 02879-1900

United States of America

<http://www.crmc.ri.gov/windenergy.html>

401.783.3370

[dciochetto@crmc.ri.gov](mailto:dciochetto@crmc.ri.gov)

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Begin forwarded message:

**From:** Katie Almeida <[kalmeida@towndock.com](mailto:kalmeida@towndock.com)>  
**Subject:** comment  
**Date:** 2023May 9, at 08:29:27 EDT  
**To:** David Ciochetto <[crmc.dciochetto@gmail.com](mailto:crmc.dciochetto@gmail.com)>

Hi David,

Attached is my comment that I send to CRMC.

Thanks,  
Katie

## **Katie Almeida**

**Senior Representative, Government Relations and Sustainability**

45 State Street | Narragansett, RI 02882 USA

O: 401-789-2200 x143 | C: 508-930-2633

[www.towndock.com](http://www.towndock.com)



45 STATE STREET | PO BOX 608  
NARRAGANSETT, RI 02882

May 8, 2023

Dear CRMC Board,

We are again facing approval of a wind farm that severely undervalues Rhode Island's fishing industry, as happened with Vineyard Wind and South Fork.

During last week's CRMC Board meeting, Orsted directly stated that they disagree with URI's economic assessment of our industry. CRMC repeatedly places more weight on the wind energy companies' assessment of the industry's value than it does the fishing industry's own assessment. This leaves the fishing industry vastly undervalued.

The fishing industry has asked wind companies to conduct research before, during, and after construction to study the effects of construction and operation on the ecosystem and fisheries. To date, adequate long-term baseline studies have not been conducted by any wind company.

Orsted has stated they only plan to monitor this area for 2 years, which is too short to understand long term impact, compromising data integrity. As I'll detail below, Orsted has stepped away from a research project and changed another project last minute, putting necessary data sets at risk. The lack of proper monitoring and research of these projects will leave us without the critical data necessary to measure the changes resulting from construction and operation. This is a risk to both the fishing industry and the ecosystem. Without this data there is no way to assess the impacts of wind projects versus other factors including climate change.

The lack of enforceable policies on research, mitigation, monitoring and working with the fishing industry enables competing interests to operate with minimal oversight, not always in good faith, and without full transparency. CRMC is not able to fix all these issues, but they can decide whether to approve consistency or not.

Regarding the CRMC document, the following statements are concerning:

*"Negative impacts are anticipated for Rhode Island-based commercial and recreational fishers from the development of the Project. Regarding the commercial and for-hire recreational fishing sectors, the RWF may cause major adverse incremental and overall cumulative impacts."*

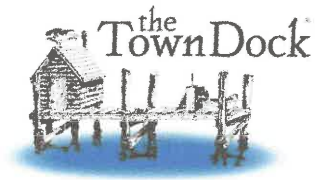
Yet, CRMC is slated to approve consistency.

*"The Revolution Wind DEIS states that the "presence of structures would result in a long-term moderate adverse effect on benthic habitat."*

RI OSAMP is supposed to protect our habitat and ecosystem. This is a direct violation of that management plan.



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*“The presence of structures will also alter navigational patterns in the long term. This displacement is anticipated to create user conflicts and force some fishers to find alternative fishing locations or exit the fishery permanently.”*

You can find many written comments from industry members explaining why fishing locations cannot simply be relocated, due to gear restrictions, gear conflicts, permit issues, etc.

According to the FAB memo: *“Despite Developers assertions, based on the developer’s latest project map there are at least 13 sites in which turbines are being placed in glacial moraines. Because of this, glacial moraines are being permanently impacted. Impacts to this APCs, like Glacial Moraine, requires more robust mitigation. Developer therefore shall relocate any boulders that need to be moved to areas that already contain High Boulder Density (greater than 200 boulders per 100m x 100m) and provide a “as-built” plan evidencing boulders moved and their new locations”*

This issue has not been worked out at the CRMC level and has still been left unresolved.

Credibility and confidence in Orsted were brought up as another a reason to reject consistency and send this package back for discussion and modification. I’d like to add a few reasons why Orsted lacks credibility and our confidence when it comes to trusting them to carry out what they say they will as it relates to financial mitigation, research needs and transparency.

1. Orsted cancelled a NOAA and fishing industry supported gillnet study because of the “optics” of using a gear that interacts with protect resources. Leaving us without a valuable data.
2. Orsted made the unilateral decision to drop a traditional pot survey for a ropeless survey. Ropeless technology is still in development and not an approved gear for the industry to use yet. The decision puts this survey and the much-needed data at risk.
3. During the South Fork financial compensation discussions, the public asked for an explanation from the URI economist on the two compensation packages. Orsted’s lawyer opposed a discussion that would have helped the public better understand the issue they were to be commenting on. This is an example of Orsted not supporting a transparent process. This exchange was recorded on video.
4. At last week’s CRMC meeting a concern was brought up during the South Fork wind process. Orsted’s lawyer spoke up against discussing the issue because it concerned South Fork and not Revolution Wind. However, this is an Orsted issue in general and should have been allowed to have been discussed. Once again thwarting transparency.
5. Lastly, Orsted and other wind companies often bring up the 1x1 turbine siting as an example of how they considered the fishing industry’s needs. During last week’s CRMC meeting they said they were the driver behind getting the other developers to support the 1x1. An important detail that was left out was that by agreeing to a 1x1 layout developers abandoned any further discussion of transit lanes. Orsted and the rest of the wind companies decided this alone, behind closed doors, without the fishing industry’s input.



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This was after a year of conferences and webinars with the fishing industry to come up with an agreement on transit lanes.

The examples above show a complete lack of transparency on Orsted's side. They also show a lack of willingness to truly work with the industry on mitigation and research.

The industry has been laying a record of how broken this the pathway to offshore wind construction is and how little our concerns have been considered.

With the Block Island Wind farm, Rhode Island was going to show how incremental steps towards offshore wind could work for the state and the environment. This is anything but incremental. It was not what was promised to us.

I do not support approval of consistency for this project. Orsted should be required to come up with a better compensation, mitigation, and research package and they need to work with the FAB to do so. Without a proper financial compensation/mitigation and research package offshore wind companies will not be held accountable for the damage and/or changes they cause to the environment and entire industry.

The industry is fighting to protect their jobs and the environment. Without a healthy and thriving ecosystem we don't have an industry and the fish, mammals and sea birds don't have a place to live, eat, and reproduce.

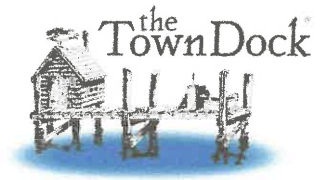
Thank you for taking the time to hear about my concerns.

Sincerely,

Katie Almeida  
Sr. Representative, Government Relations & Sustainability  
The Town Dock



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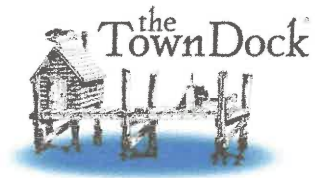
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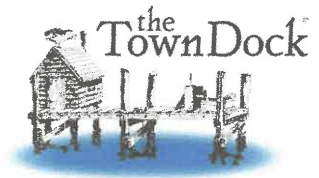
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