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Good afternoon,
Working with the FAB in the last several days, we propose the following terms for a mitigation agreement. There are several outstanding issues listed below the terms on payment and we are hopeful that we can continue to discuss ways to address them.

Commercial:
$34M - This includes using a mixture of the VMS and VTR data products to estimate landings- which are likely underestimated from VTR alone. I make many of the same assumptions from the WHOI report, except that there will be considerable effects of the WLA from operations (equal to 70% loss at 3% discount rate). I am assuming that the loss of area is driven by turbine footprints which extend laterally for many fisheries, movement of boulders, the increase in navigation costs and risks associated with operating in a WLA, and the effects of changes in trawling patterns and the 'gentlemens' agreement.

Recreation:
$1.58M - Using the data provided by WHOI I expect a $700k size of loss, mainly from construction and decommissioning. I have adjusted the estimate by a factor of 1.5 to due to the high interest of recreational fishers around Cox Ledge, and the fishing competitions which take place in the WLA. Effects of operations are estimated at $880k due to the impact on big game fishing in the WLA over operations.

Charter:
$1.5M - Using the survey data provided by WHOI I expect a $500k loss, mainly from construction and decommissioning. Effects of operations are estimated at $1M due to the impact on big game fishing in the WLA over operations.

For Charter and private recreation there are many glacial moraines in the area of the WLA which are important to the recreational fisheries and private charter businesses. Due to the location of WLA, if these fish(tuna, cod, shark, for example) move elsewhere there are not equivalent replacements for this habitat and fishing location for recreational fishers. So, secondary sites are much less valuable and we could observe significant exit from the recreational fishery. Sites further away are generally unattractive to most recreation fishing due to steam time. In essence, the site is uniquely valuable and poses a significant loss during times of construction-and if permanent damage then permanent damage to this industry.

Total: $37.08 Mil in 2022 dollars

In addition we request that any findings from the cable studies in the Bay be applied to the cable in federal waters.

Other issues:

1. Moving boulders- they should be moved to existing boulder fields. Large boulders, can cables go around them to maintain habitat?
2. Contingency for unforeseen effects on spawning and existence of critical species in WLA. Some effects of cod have been noted in the Block Island project and there is a concern that if particular species are removed from the area it would be devastating to multiple fisheries.
3. Follow up studies in the area of lobster and other key species in coordination with RI DEM. Identify the fishing monitoring plans for species pre and post construction-make sure important species have coverage.
4. Todd is surveying recreation anglers to increase the accuracy of the current estimates.
5. In addition, we request that any findings from the cable studies in the Bay be applied to the cable in federal waters.
6. Moraines, according to CRMC, can require more robust mitigation measures. If there is no further opportunity to move the project out of moraines, we should discuss further.
7. How are cumulative impacts of several wind farm projects valued? Especially when they are right next to each other on Cox Ledge? Cumulatively we are looking at the total loss of fishing on Cox Ledge during construction and decommissioning. Possibly during operations once all farms gain approvals and are constructed.
8. Construction schedule needed – with value placed on delays. Must avoid Atlantic Cod spawning between November and April at all costs – need to confirm this timing is correct for spawning.
9. Developer admits in Sunrise Wind materials that there will be impacts to Radar. How to mitigate effects on Radar?
10. Value on light pollution to night time fishing?
11. Issue of fishers being declined insurance coverage so that fishing in federal lease area is prohibited by risk. Can we include this occurrence as a damage upon denial of coverage every year and estimate damage as loss of revenue attributable to particular lease area?

Thanks,
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