

Cstaff1

2021-06-029

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**From:** Mike Jarbeau <mjarbeau@savebay.org>  
**Sent:** Monday, May 8, 2023 12:12 PM  
**To:** Jeff Willis  
**Cc:** council@crmc.ri.gov; cstaff1@crmc.ri.gov  
**Subject:** Save The Bay comment re: Revolution Wind Federal Consistency  
**Attachments:** STB Rev Wind CRMC Federal Consistency Comments.pdf

Jeff,

Please find attached Save The Bay's comments regarding the Revolution Wind Federal Consistency determination. We appreciate your willingness to accept this letter in lieu of comment tomorrow night, as I am not able to attend the continuation of the hearing.

We ask that this letter be provided to the Council for review, and read into the record.

**Mike Jarbeau**

*Narragansett Baykeeper, Save The Bay*

(401) 272-3540 ext. 116

[narrabaykeeper](#) | [@narrabaykeeper](#)



| [SAVEBAY.ORG](#)



THE BAY CENTER  
100 Save The Bay Drive  
Providence, RI 02905  
phone: 401-272-3540  
fax: 401-273-7153  
[savebay@savebay.org](mailto:savebay@savebay.org)  
[www.savebay.org](http://www.savebay.org)

EXPLORATION CENTER  
Easton's Beach  
P.O. Box 851  
Newport, RI 02840  
phone: 401-324-6020  
fax: 401-324-6022

SOUTH COAST  
CENTER  
Riverside Building  
8 Broad Street  
Westerly, RI 02891  
phone/fax: 401-315-2709

May 8, 2023

Jeffrey Willis, Executive Director  
Rhode Island Coastal Resources Management Council  
Stedman Government Center  
4808 Tower Hill Road  
Wakefield, RI 02879

**Re: RI CRMC Federal Consistency Review of the Revolution Wind Project, CRMC File No. 2021-06-029**

Dear Director Willis,

Save The Bay recognizes the urgent need for offshore wind development in order to adapt to climate change and meet state and regional renewable energy goals. As such, we support responsibly-developed offshore wind projects, properly sited to minimize the impact on the existing natural environment. Cox Ledge is not the right location for offshore wind infrastructure. The known and potential impacts from this project and cumulative impacts to Rhode Island's coastal resources, including unique, essential fish habitat, from project construction, installation, operation, and decommissioning, are irreversible. Save The Bay is concerned with the ongoing, cumulative impacts that this project will have on Cox Ledge.

Save The Bay testified before the Council in June 2021 to share the organization's concerns related to the impact that the South Fork Wind project (SFW) would have on the unique and valuable habitat on and around Cox Ledge. The subdivision of offshore lease OCS-A 0486, creating the current Revolution Wind and South Fork Wind lease areas, created conditions that forced Rhode Island's hand in voting for federal consistency despite the project's location on Cox Ledge, an Ocean SAMP-designated Area of Particular Concern based on the habitat value of its unique glacial moraine structure. Those same concerns apply to the Revolution Wind project.

When the applicant reconfigured the lease areas during SFW development, it limited alternative turbine locations that would not impact Cox Ledge. As stated in the SFW staff report, "Ørsted created their own hardship in this matter by segregating the 0517 lease area from the much larger 0486 lease during BOEM's ongoing DEIS development process, and thus eliminated the alternative to relocate turbine foundations to avoid damage to glacial moraine resources and values." The applicant should not continue to be rewarded for reconfiguring the lease area knowing that the Council wanted to avoid glacial moraine.

As stated in the SFW staff report, "the location of the SFW project on Cox Ledge... is in our view one of the worst possible locations within Rhode Island Sound." Revolution Wind proposes turbines and/or offshore substations on this same offshore feature. While we understand there are risks of habitat loss to meet wind energy goals, this project may disrupt some of the most valuable habitat in Rhode Island Sound. Cox Ledge is one of the few remaining places in Rhode Island Sound where Atlantic cod are found at all life stages. While all fish habitat is important, spawning and nursery areas are especially important in providing shelter for these

species during the most vulnerable stages of their life cycles. Despite proposed mitigation measures, this project adds to the cumulative negative impacts to Cox Ledge.

As you know, the federal consistency determination is being made without the benefit of a Final Environmental Impact Statement or final engineering and layout decisions. The Executive Director, along with other state leaders have advocated for changes to the federal regulatory scheme that would provide states with the necessary environmental information before the clock starts running on consistency determinations. In addition, lease areas should not be subdivided by BOEM without state and other federal agency input. When Save The Bay provided written comment to BOEM on the Revolution Wind Draft Environmental Impact Statement last Fall, we supported project alternatives that minimized infrastructure placement on Cox Ledge and glacial moraine.

We understand that federal regulations require a decision within six months unless an extension is agreed to by the applicant so this Council is forced to make this critical decision on limited information about impacts from this project and no assessment of cumulative impacts from this project and South Fork. We appreciate the extremely hard work done by CRMC staff to leverage State and Federal regulations in the interest of our offshore environment and work with the applicant to reduce the number of turbines and employ micrositing. Even with the staff's work to mitigate impacts, it remains unclear whether project benefits will outweigh damage to the offshore environment. Should the Council vote to certify federal consistency, Save The Bay urges the developer to continue to develop and invest in methods to minimize impacts to Cox Ledge in every way possible.

Thank you for considering our comments.

Sincerely,



Mike Jarbeau  
Narragansett Baykeeper