



# TKJEDELE LAW

June 13, 2018

**Electronically submitted via [cstaff1@crmc.ri.gov](mailto:cstaff1@crmc.ri.gov)**

Coastal Resources Management Council  
Stedman Government Center  
4808 Tower Hill Road, Suite 3  
Wakefield, R.I. 02879-1900  
ATTN: Grover J. Fugate, CRMC Executive Director

**Re: *East Farm Commercial Fisheries Center of RI Comments Regarding the Vineyard Wind LLC Federal Consistency Certification (CRMC File No. 2018-04-055).***

Dear Director Fugate,

Please accept these comments on behalf of the East Farm Commercial Fisheries Center of Rhode Island (“the Commercial Fisheries Center”). These comments are being made with respect to a federal consistency certification filed electronically by Vineyard Wind LLC (Vineyard Wind) on April 6, 2018, for the proposed construction of an approximately 800 megawatt (MW) wind energy project located within the Bureau of Ocean Energy Management Lease Area OCS-A-0501.

The Commercial Fisheries Center is a non-profit entity, incorporated as a 501(c)(6) in Rhode Island, and is being represented by the undersigned legal counsel in the review and permitting process for the Project Area. The Commercial Fisheries Center represents the Ocean State Fishermen’s Association, RI Commercial Fishermen’s Association, the Eastern New England Scallop Association, the RI Lobstermen’s Association, RI Shellfishermen’s Association, RI Monkfishermen’s Association, Point Judith Fishermen Memorial Foundation, Atlantic Offshore Lobstermen’s Association, Commercial Fisheries Research Foundation, RI Party & Charter Boat Association, and the Pt. Judith Scholarship Foundation. Importantly, the Commercial Fisheries Center represents the commercial interests of Rhode Island fishermen who rely on access to and protection of sustainable fisheries for their survival. For the purpose of filing these comments,

reference to the Commercial Fisheries Center, its positions, concerns, and recommendations is inclusive of all of the aforementioned associations and their respective members.

### Background

The Vineyard Wind project is subject to consistency review by the State of Rhode Island because, on April 6, 2018, Vineyard Wind, voluntarily provided a consistency certification to the State of Rhode Island within the 30-day notification period referenced in 15 CFR §930.54(a)(2). NOAA's CZMA regulations contain the requirements and procedures related to consistency review proceedings and state coastal management programs. 15 C.F.R. §930.54(f) states: "If an applicant, of its own accord or after negotiations with the State agency, provides a consistency certification and necessary data and information to the State agency, the review shall be deemed to have received the Director's approval, and all of the provisions of this subpart shall apply and the State agency need not request the Director's approval." (emphasis added).

By regulation, CRMC had a 30-day period from April 6, 2018, to notify Vineyard Wind that its certification was missing necessary data and information as described in 15 C.F.R. § 930.58(a), and to toll the six-month review period. CRMC did not notify Vineyard Wind that the consistency certification was missing necessary data and information within the 30-day time period prescribed by regulation. While the missing data and information must still be provided to CRMC, the fact that it has not yet been provided can no longer be used as a justification to toll the 6-month review period, which began on April 6, 2018, and ends on October 6, 2018.<sup>1</sup>

### Necessary Data And Information Must Be Provided To CRMC Before October 6, 2018

Vineyard Wind's consistency certification misrepresented the existence of necessary data and information that is essential to any objection, or conditional concurrence by the State with regard to the consistency of the Vineyard Wind project with the enforceable policies of the Rhode Island Ocean Special Area Management Plan (RI SAMP).<sup>2</sup>

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<sup>1</sup> The fact that the State agency did not inform the applicant that necessary data and information was missing within the 30-day period for doing so is not a statement regarding the adequacy of the information received. Moreover, a State agency's subsequent assertion that the submitted information is substantively deficient, or a request for clarification of the information provided, or information or data requested that is in addition to that required by § 930.58 shall not extend the date of commencement of State agency review unless the State and the applicant agree to toll the 6-month review period. See 15 C.F.R. §930.60(a)(3)(c).

<sup>2</sup> That CRMC did not request Vineyard Wind to provide necessary data and information within 30 days of April 6, 2018, to toll the six-month review period, is a constructive waiver pursuant to 15 C.F.R. §930.60(a)(2). Nonetheless, the requirements of 15 C.F.R. § 930.58(a) must be satisfied prior to the end of the six-month consistency review period or the CRMC may object to the consistency certification for insufficient information.

Section 1160.5 of the RI SAMP states that “for federal permit applicants, a meeting with the FAB (Fisherman’s Advisory Board) shall be necessary data and information required for federal consistency reviews...” The pre-application meeting with the FAB is necessary data and information because RI SAMP §1160.2, includes a prohibition on Large-scale offshore development located within areas of high fishing activity as identified during the pre-application process by the Fishermen’s Advisory Board.

Vineyard Wind acknowledged that its project was subject to the prohibition, contained in the RI SAMP, of large-scale offshore development located within Areas of Particular Concern (APCs), which include areas of high fishing activity as identified during the pre-application process by the Fishermen’s Advisory Board, but, then misrepresented the existence of this necessary data and information in its consistency certification. Specifically, Vineyard Wind wrote: “RI SAMP Section 1160.2 includes a prohibition on Large-scale, Small-scale, or other offshore development, or any portion of a proposed project within Areas of Potential Concern (APCs). Consistent with this provision, the Project is not located within any APC, including: Areas of high fishing activity *as identified during the pre-application process by the Fishermen’s Advisory Board.*” See Vineyard Wind April 6, 2018, Consistency Certification, Table 3-1, pp 25-26. (Emphasis added). Vineyard Wind never had a pre-application meeting with the FAB, and the FAB has yet to provide the CRMC with its assessment about whether, and to what extent, areas of high fishing activity within the Vineyard Wind area should be designated as APCs. The applicant has a responsibility to accurately represent whether all necessary data and information has been provided in its consistency certification. It is the position of the Commercial Fisheries Center that the CRMC can and should object to Vineyard Wind’s consistency certification on this basis alone.

In the alternative, and at the very least, in order for the CRMC to make a determination with respect to Vineyard Wind’s consistency certification, a meeting between the applicant and the FAB must take place prior to the CRMC vote on September 25 , 2018.<sup>3</sup> Areas of high fishing activity within the Vineyard Wind project area may be identified during the pre-application process by the Fisherman’s Advisory Board, as defined in RI SAMP §1160.1.6, for designation by the Council as APCs. See RI SAMP §§1160.1.6 and 1160.2(3)(v). The identification of an APC through this process could prove to be significant, since all Large-scale offshore development, or any portion of a proposed project, “shall be presumptively excluded,” from APCs. See RI SAMP §1160.2.1-3.

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<sup>3</sup> The enforceable policies of the RI SAMP also require a pre-application meeting with the Habitat Advisory Board (HAB) as necessary data and information. Vineyard Wind has not made any representation about whether a pre-application meeting with HAB has taken place. See RI SAMP §1160.1.11.

The Commercial Fisheries Center furthermore requests that the applicant be informed that a “pre-application” meeting with the FAB is necessary supplemental information that must be provided for purposes of the CRMC’s consistency review. The CRMC should issue a public notice for a “pre-application” meeting between the CRMC staff, the applicant and the FAB to take place no later than August 4, 2018, to discuss potential fishery-related impacts, such as, but not limited to, project location, construction schedules, alternative locations, project minimization and identification of high fishing activity or habitat edges within the proposed project location. The CRMC should provide a stenographer for the “pre-application” meeting so that the minutes from the meeting can be made part of the public record with respect to the applicant’s consistency determination. The FAB should provide the CRMC with an advisory opinion prior to the September 25, 2018 CRMC hearing, identifying any areas of high fishing activity within the project area, discussing the significance of impacts to areas of high fishing activity associated with the proposed project, and addressing whether any modifications to the project design or turbine layout could mitigate impacts to satisfy consistency.

Vineyard Wind should be advised that its project may be presumptively prohibited by the enforceable policies of the RI SAMP. If the project is determined to be presumptively prohibited in certain areas within the project envelope because the FAB has identified high fishing activity within these areas<sup>4</sup>, the Vineyard Wind project must meet a different standard of proof in order for its project to be deemed consistent with the enforceable policies of the RI SAMP.<sup>5</sup> As such, Vineyard Wind should submit supplemental information in support of its consistency certification that demonstrates by clear and convincing evidence that there are no practicable alternatives to its project size and turbine placement that are less damaging in areas of high fishing activity, and that the proposed project will not result in a significant alteration to the values and resources of any area of high fishing activity within the envelope area for the proposed project. Additionally, Vineyard Wind should be asked to provide a mitigation plan that protects the areas of high fishing activity within the project area. Mitigation measures may include, but are not limited to, compensation, effort reduction, habitat preservation, restoration and construction, marketing, and infrastructure improvements. Where there are potential impacts associated with proposed projects, the need for mitigation shall be presumed. See RI SAMP §1160.1.8

#### The Vineyard Wind Project Will Have Reasonably Foreseeable Effects On Rhode Island’s Commercial Fishing

Section 307 of the Coastal Zone Management Act of 1972 (CZMA), also known as the “federal consistency” provision, requires that federal actions, which include federal permits, within and outside the coastal zone, which have reasonably foreseeable effects on any coastal use (land or

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<sup>4</sup> Long-term impacts to high fishing activity areas are defined as those that affect more than one or two seasons. RI SAMP §1160.1.6.

<sup>5</sup> RI SAMP §1160.2.2

water) or natural resource of the coastal zone be consistent with the enforceable policies of a state's federally approved coastal management program. 16 U.S.C §1456(a)(1)(A). There can be no doubt that the Vineyard Wind project will have reasonably foreseeable effects on areas of high fishing activity and use by Rhode Island commercial fishermen and that those effects are likely to have long-term and significant consequences.

In the first phase of the Vineyard Wind project alone, according to the Construction and Operation Plan (COP) submitted to the Bureau of Ocean Energy Management, Vineyard Wind plans to install between 88 and 106 wind turbine generators, up to 4 electrical service platforms, 156.4 nautical miles (nm) of cable, and up to 3 offshore export cables that are each 122.5 nm long. This is just the first phase of the first project planned for the waters off the Massachusetts and Rhode Island coasts.

Deepwater Wind's Revolution Wind could be built off the Massachusetts/Rhode Island coast at various sizes up to 400 MW in its first phase. Bay State Wind is a proposed offshore wind project located 25 miles off the Massachusetts' coast, and 15 miles off the coast of Martha's Vineyard with the potential to build up to 2000 MW of wind power in the area. Combined and fully developed, these projects could install nearly 300 turbines in the waters off Massachusetts and Rhode Island.

With projects of these sizes planned in contiguous areas and that involve significant portions of high value fishing grounds for Rhode Island commercial fishermen, the direct effects are clear and the cumulative and other indirect effects are reasonably foreseeable.

We know that Nantucket Sound and in particular the Southern New England Bight provide important feedings and spawning habitat for many commercial important fish species, including blue fish, striped bass, scup, and longfin squid. The Massachusetts Division of Marine Fisheries Department described the reasonably foreseeable effects possible from developing the Vineyard Wind project, to the extent proposed, in the Southern New England Bight, writing that "the success of spawning and juvenile development activities of some of these species in the Sound may impact abundance levels as far down the eastern seaboard as the Mid-Atlantic states due to historic migratory patterns." See Commonwealth Division of Marine Fisheries April 30, 2018, Comments on BOEM's NOI to Prepare An EIS for the Vineyard Wind Energy Project, p.1.

The Commercial Fisheries Center is concerned about access to important and valuable fishing grounds during construction. For example, the VMS data relied on by the Northeast Regional Ocean Council ("NROC"), and included in the COP, qualitatively characterizes the commercial fishing density for longfin squid in the Project Area between 2015 and 2016 as high to very high in the exact location where the wind turbines are proposed to be constructed. COP, Vol. III, Figure 7.6-10. The highest valued and primary species harvested by the Point Judith Trawler

fleet out of Rhode Island is longfin squid (*Loligo*). In the spring and summer (May – September) there is a major effort in the shoal water south of Martha’s Vineyard and southwest of Nantucket by 30 – 50 vessels / day trawling for squid. As the season progresses the squid migrate into the southwest, directly into the Project Area. The proposed design layout and spacing for a maximum of 106 WTGs in the northern end of the Project Area would make trawling for squid impossible. And, though Vineyard Wind has stated that there will be no limitations or restrictions on fishing activity in the area during construction, this statement cannot be verified independently because the detailed construction schedule is redacted from the COP. In order to fully assess coastal effects, CRMC and the FAB must have access to the detailed construction schedule. Understanding timing associated with cable installations and pile driving will be necessary to determine whether there will be time of year restrictions for commercial fishing, and to fully develop mitigation measures to reduce or compensate for impacts to fisheries resources, and commercial fishing activities.

The grid style layout of the wind turbines is as impactful to accessibility as the proposed placement of the maximum number of WTGs (up to 106) in the Project Area. In order to tow their gear effectively, trawlers need East to West lanes of 1 nautical mile or greater, without interference from randomly spaced turbines, in order to avoid losing or damaging their nets. The placement of 106 wind turbines with their spacing at less than 1 nautical mile in some cases, would force a trawler to zigzag through the area without being able to locate or avoid fixed gear, and, quite possibly, without being able to avoid the scour protection around the base of each turbine. In other words, without this modification to the design layout, trawlers would risk destroying and damaging their own nets, along with the fixed gear, and neither the lobster fishery nor the squid fishery would have very much success. The mere likelihood of entanglement or collision is enough to force squid fishermen to abandon the area. This loss of safe access to a prime fishing ground would result in displacement, forcing vessels to make a living in alternative fishing grounds where there is traditional existing effort from the trawling fleet harvesting other species such as; (whiting, hake, scup, summer flounder, monkfish, etc.). This type of displacement could cause an economic decline approaching 25% for the squid fishery. Not only could the project result in the displacement of fishermen, noise associated with pile driving massive monopiles into the seabed and electromagnetic fields and other low frequency noises could drive longfin squid from the traditional summer grounds (Martha’s Vineyard to Nantucket / SW). This could result in a potential loss of up to 20% - 25% of the longfin squid quota between May and August.

When assessing the reasonably foreseeable effects associated with the turbine layout for the Vineyard Wind project, it is essential to consider the economic hardship that will result from the Vineyard Wind project as currently designed. In particular, the failure to include a 2 mile-wide, North to South transit lane within the turbine layout will greatly impact RI fishermen’s ability to augment their squid fishing trips with whiting. The longfin squid fishery is a daytime fishery

south of Martha's Vineyard and Nantucket. Historically, trawlers steam to the west and south to the deeper (28-30F depth) to harvest whiting during the night to augment their trip. Without a North to South transit lane, the trawlers would have to choose to steam around the turbines or weave through the maze of turbines - a perilous navigational situation as the turbines are currently laid out. Choosing to go around has its costs, especially in the summer time. Steaming around the turbines will lengthen the steaming time, thereby decreasing the time that the net is fishing on the bottom, and ultimately leading to fewer whiting harvested. The intent is to make two 2.5 - 3.0 hour tows and be back on the squid grounds by 5 - 5:30 AM. If this is not possible, and the only other alternative is to attempt to navigate the maze of turbines at night, many fishermen will be forced to avoid fishing for whiting all together, causing further economic hardship.

CRMC must also look ahead to anticipated design layouts for projects to come. CRMC should determine, with input from the FAB, what the best configuration for this project is given what we know about the projects to come.

The impacts of electromagnetic fields (EMF) are poorly studied. The impact of EMF on longfin inshore squid, scup, butterfish, monkfish, tuna, cod, Jonah crab, lobster, little skate, winter skate and dogfish, not to mention marine mammals, should be addressed by Vineyard Wind. It is especially critical to be able to defend a burial depth of 2 m as protective of species of concern.

The reasonably foreseeable effects from the Vineyard Wind project, alone, include, as discussed above: Strained or significantly reduced access to important fishing grounds for mobile and fixed gear fishermen; increased navigational hazards that will result in reduced access and displacement of fishermen; increased fishing pressure on other species and on other locations within Rhode Island's coastal zone resulting from displacement; destruction of or serious injury to spawning and feeding grounds, resulting from sustained pile driving, which will impact abundance and have long-term impacts for RI commercial fisheries; impacts to EMF sensitive species that will cause species displacement and long-term impacts to especially long fin squid, Jonah crab, and lobster fisheries; direct mortality to fish, as a result of sustained pile driving and dredging, especially to stationary species and larvae that will impact the abundance and future stock assessments, and; direct impacts to marine mammals in the area that frequently follow squid for feed, particularly during construction and the percussive impacts of pile driving. With respect to the direct mortality concern specifically, construction of nearly 106 wind turbines and dredging for the transmission cable pathway has the potential to permanently alter important lobster and Jonah crab habitat, and could potentially cause direct mortality to American lobsters and crab contained within that habitat. In order to demonstrate consistency, Vineyard Wind should sufficiently characterize the American lobster and Jonah crab habitat and potential impacts to that habitat. As previously stated in the Commercial Fisheries Center's comments on the Vineyard Wind COP, the applicant has not appropriately characterized the fishery resources in the project area. In addition to failing to appropriately account for the high intensity and high

value long fin squid fishery, the consistency certification and COP as presented do not sufficiently characterize the lobster and crab resources and essential lobster and crab habitat contained within the construction footprint of the Vineyard Wind project or its associated transmission cable pathway.

In addition to examining all of these reasonably foreseeable direct effects from this one project, CRMC must add to its assessment of effects, what we know are similar and likely future project impacts that will soon be proposed in contiguous lease block areas.

#### Vineyard Wind's Certification Letter Fails To Demonstrate Consistency

NOAA's consistency regulations require that: "Applicants shall demonstrate that the activity will be consistent with the enforceable policies of the management program. Applicants shall demonstrate adequate consideration of policies which are in the nature of recommendations." 15 C.F.R. §930.58(a)(3). The burden is on Vineyard Wind to demonstrate that its project is fully consistent with the enforceable policies of the State<sup>6</sup>, and, thus far, Vineyard Wind's demonstration is not adequate.

Instead of making a demonstration of consistency, the consistency certification makes general assumptions without providing any supporting data about the the sensitivity of impacted resources and the persistence of effects on fisheries from construction and operation. For example, the consistency certification, Table 3-1, p.28-30, makes the following unsupported statements:

"*overall*, impacts to fisheries resources during construction are *anticipated* to be short-term and localized;"

"Pelagic species will be able to avoid construction areas and *are not expected to be substantially impacted* by construction and installation;"

"Impacts to mobile pelagic fish and invertebrate species include *localized and short-term avoidance* behavior;"

"Although eggs and larvae may be entrained and will not survive, loss of many adult fish and population level impacts *are not expected* as most of these species produce millions of eggs each year and already have low adult survival rates;"

"Burrowing mollusks in the area, such as quahogs, will likely be able to avoid construction and burial and are only *expected to be slightly impacted* and exhibit *short-term avoidance* of the area;"

"Impacts to finfish and invertebrate species are *expected to be short-term and localized* during the construction and installation of the Project;"

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<sup>6</sup> "Applicants shall demonstrate that the activity will be consistent with the enforceable policies of the management program. Applicants shall demonstrate adequate consideration of policies which are in the nature of recommendations." 15 C.F.R. §930.58(a)(3).

“During operations and maintenance, noise generated from the operation of wind farms is *anticipated to be minimal and only localized avoidance behaviors are expected;*”

“The addition of EMF from submarine cables *will likely not have an impact* on elasmobranchs or other electro-sensitive fish species, as cables will be buried in the substrate or covered with rock or concrete mattresses.”

These statements are not a “demonstration” that the project is consistent with the enforceable policies of the RI SAMP. They are assumptions not supported by data. The applicant shoulders the burden of demonstrating consistency and Vineyard Wind has not met its burden here. CRMC should request that the applicant supplement its consistency certification with the data and sources that support the assumptions made about minimal, short-term, or localized impacts to fishery resources in the project area.

#### The Vineyard Wind Project Is Not Consistent With The Enforceable Policies of the RI SAMP

The “Regulatory Standards” relating to application; design, fabrication and installation; pre-construction; construction and decommissioning and; monitoring in RI SAMP §1160 are enforceable policies for purposes of the Federal CZMA Federal Consistency provision (16 U.S.C. § 1456 and 15 C.F.R. part 930).

Specifically, the Vineyard Wind project is not consistent with regard to the following sections: the following sections of the RI SAMP: §§1160.1.3; 1160.1.5-11; 1160.2.3(v).

#### The Vineyard Wind Project Is Inconsistent with RI SAMP §1160.1(3)

The Vineyard Wind project will cause significant adverse impacts requiring modification of the project or denial. See RI SAMP §1160.1(3). Significant long-term negative impacts to Rhode Island’s commercial or recreational fisheries are defined as those that affect more than one or two seasons. See RI SAMP §1160.1.6 RI SAMP §1160.1.6

All of the reasonably foreseeable effects from the Vineyard Wind project constructions and design layout as currently proposed and which have been discussed above are likely to affect multiple seasons of high valued and primary fishing with the Vineyard Wind project area. When assessing significant adverse impact, CRMC should consider also the importance of the area to RI commercial fishing interests (an assessment that should consider the advisory opinion from the FAB that will result from a pre-application meeting with the applicant); the size of the area impacted by the project; the sensitivity of the impacted resources (especially with regard to spawning and habitat disturbance); the persistence of the effect of this project (the first phase of this project will be constructed over a period of three to five years); cumulative effects (*e.g.*, loss of multiple important sites to fixed gear fishermen).

### Importance of the Area

Seemingly, in an effort to diminish the importance of the project area to the fishing industry, Vineyard Wind's consistency certification describes the commercial fishing and for-hire recreational fishing activities, as "variable." The RI SAMP recognizes that "commercial and recreational fisheries activities are dynamic, taking place at different places at different times of the year due to seasonal species migrations and other factors." RI SAMP §1150.4.4. The variability of commercial fishing activity is used by the CRMC as a basis to "review any uses or activities that could disrupt commercial or recreational fisheries activities," not as a means of trivializing the significance of a particular area to the fishing industry. See RI SAMP §1150.4.4(ii).

The consistency certification suggests that the project area also is relatively unimportant to the commercial fishing industry by referencing data showing that a low economic value is derived from the project area. See Consistency Certification, Table 3-1, p.27.

The Commercial Fisheries Center submitted substantial comments, dated April 30, 2018, that addressed the flaws in the economic valuation presented in the Vineyard Wind Construction and Operation Plan (COP). The same faulty and inconsistent assertions about economic value derived from the project area that were asserted by Vineyard Wind in the COP are simply restated in the consistency certification provided to CRMC. Specifically, the certification letter states that based on the analysis by Kirkpatrick et al. (2017) of commercial fishing activity within the MA WEA, commercial fishing revenue generated from within the MA WEA constitutes small percentages of each fishery's total revenue. See Table 3-1, p. 28. Unsubstantiated and careless statements such as this one can hardly amount to a "demonstration" that the project is consistent with the enforceable policies designed to prevent significant adverse impacts to the RI commercial fishing industry.

RI commercial fishing interests in the project area are robust and of high value. RI trawlers and fixed gear fishermen rely on the project area for important species like longfin squid, lobster and Jonah crab. With respect to the significance of the area to RI Commercial fishing interests, the Commercial Fisheries Center incorporates by reference its public comments on the COP and asks the CRMC to review the comments when considering the importance of the project area to RI Commercial fishing interests. Moreover, members of the FAB, who are also members of the Commercial Fisheries Center will present additional data and information that show the importance of this area and the high intensity fishing use and value in the project area for discussion and consideration during the pre-application meeting with the applicant.

### Size of the Area

The size of the lease area is less important in this case than the size of the proposed project relative to the high intensity fishing activity that takes place within that area. The size of the area is important when evaluating the cumulative impacts to fixed gear fisheries, like the lobster fishery. If all of the offshore wind projects currently in the federal permitting pipeline are built to their maximum build out designs, the remaining available areas for fixed gear fisheries will be significantly reduced. When the areas available to fixed gear fisheries are reduced in size the consequence is displacement. The associated effects of displacement are increased fishing pressure exerted by fixed gear fishermen moving to other areas already being fished and significant gear conflicts caused by fixed gear fishermen attempting to fish outside of the wind turbine areas. The risk caused by irresponsibly siting these turbines is that traditional longstanding "bottom" sharing agreements between mobile and fixed gear fishermen will be strained or even voided. See attached *Lobster Management and Wind Energy Areas*.

### Persistence of Effect

When it comes to the persistence of the effects on the fisheries and the industry, the Commercial Fisheries Center is especially concerned that the first phase of this project alone will be constructed over a period of three to five years. Not only could construction activities over this period of time result in the destruction of larvae and stationary species over a sustained period of time and during critical spawning periods, but it could also result in the the displacement of fishermen from valuable fishing grounds. Moreover, noise associated with pile driving massive monopiles into the seabed for an extended period of time could drive longfin squid from the traditional summer grounds (Martha's Vineyard to Nantucket / SW) possibly affecting the RI longfin squid fishery permanently.

We do not have enough information from either the COP or the consistency certification to assess whether the project is fully consistent with the construction, deconstruction and monitoring standards of the RI SAMP. Specifically, the construction schedule should be provided and a monitoring plan that corresponds with RI SAMP § 1160.9.3(i-ii).

### Cumulative Effects

It is not enough for CRMC to look only to the reasonably foreseeable effects from the Vineyard Wind project on RI commercial fisheries, it must also consider all of those reasonably foreseeable effects that will result from multiple contiguous wind projects sited in a relatively small geographic space of high value to RI commercial fishing interests. For example, the effect of pile driving on fish mortality, access to high value fishing areas, and displacement will be multiplied if pile driving activities are taking place in separate lease areas by different project owners at the same time. Cumulative impact concerns include changes to the spatial distribution of species, including, but not limited to, scallops, surf clams, black sea bass, and flatfish and

to changes in fixed and mobile gear fisheries and commercial and recreational fisheries should be fully assessed.

Conclusion

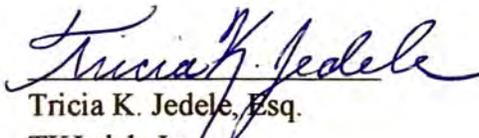
Not only are the direct, cumulative, and secondary effects associated with the Vineyard Wind project reasonably foreseeable, but they are very likely to be long-term and significant. This is especially true given the likely federal permitting of multiple large-scale offshore wind projects in relatively contiguous high value fishing grounds.

As stated above, whether the Vineyard Wind project is presumptively prohibited because it has been proposed in an area of high fishing activity; whether the project will have significant long-term impacts to RI commercial fisheries, and; whether there are modifications and mitigation that can be considered to offset the long-term impacts are questions that should be brought before the FAB in a pre-application meeting. Absent an advisory opinion from the FAB with respect to these questions, a CRMC concurrence with the consistency certification is impossible.

The Commercial Fisheries Center appreciates this opportunity to submit comments on Vineyard Wind's consistency certification and looks forward to continued participation in the consistency review process.

Respectfully submitted,

On Behalf of East Farm Commercial Fisheries Center of RI



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06.20.2018

Capt. David Blaney MMS  
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Grover Fugate  
Executive Director  
Rhode Island CRMC

Dear Sir,

The purpose of this letter is to lodge a formal objection to Permit No. 2018 – 04 – 055, Vineyard Wind LLC. I believe the permit application is **NOT** consistent with The Rhode Island CRMC enforceable policy and Standards of The Management Program for the following reasons.

The area in mention in Vineyard Wind's application is in an area historically important to the Rhode Island Commercial Fishing industry. This area is known locally to fishermen as The Star and Muskeget Channel. Vessels from Point Judith RI, have traditionally harvested finfish and shellfish from these waters, using both mobile and fixed gear for over 100 years. Point Judith RI is recognized as the nations leading port in squid (Loligo) landings. A large percentage of the squid catch being harvested in the area described in Vineyard Wind's application.

The area is also economically important to the static gear industry in that a large percentage of Small Skate is harvested in this area that is essential for the lobster bait industry. It should be noted that Point Judith is also New England's largest producer of lobster bait. I believe the Socio-Economic impact of this project to be vastly understated.

The site construction details of removal of "Sand Waves" and "Anti-Scouring" measures is a major alteration of essential habitat. These formations are well recognized by fishermen and scientists as fish attracting bottom structure.

I also am convinced that the bottom preparation activity as described in the permit is unacceptable.

Capt. David Blaney MMS

06.20.2018

*CAPT. D. R. Blaney MMS*





Town of Bristol, Rhode Island

***Harbor Commission***

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June 21, 2018

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ATTN: Grover J. Fugate, CRMC Executive Director

Subject: Vineyard Wind LLC Proposed Project

Dear Mr. Fugate,

The Bristol Harbor Commission has reviewed the federal consistency certification filed electronically by Vineyard Wind LLC on April 6, 2018 which you forwarded to us for review. We do not find anything to object to at the present time. However, we understand that there is an alternative power cable route that would go up the Sakonnet River and under the Mount Hope Bridge on route to the final destination on shore. If that alternative route were selected by Vineyard Wind we would ask that an impact study be conducted to determine the feasibility and workability of this longer and less direct route. We would sincerely like to hear of any possible consideration to this alternative route and would possibly want to comment accordingly.

Domenic Franco

Chairman, Harbor Commission

cc: Gregg Marsili – Harbormaster  
Steven Contente – Town Administrator  
Diane Williamson – Director - Community Development  
Lou Cirillo, Town Clerk  
Jim Dollins, Vice Chairman

*Submitted electronically to: cstaff1@crmc.ri.gov*

June 25, 2018

Grover J. Fugate  
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**Re: Vineyard Wind Coastal Management Act, Consistency Certification (CRMC file number 2018-04-055)**

Dear Mr. Fugate:

On behalf of Conservation Law Foundation, Natural Resources Defense Council, National Wildlife Federation, Save the Bay, and our thousands of members across New England, we submit the following comments on the Vineyard Wind Coastal Zone Management Act Consistency Certification (“Certification”)<sup>1</sup> submitted by Vineyard Wind, LLC that purports to be consistent with the enforceable policies of the State of Rhode Island’s federally approved coastal program and in particular, the Coastal Resources Management Council’s Ocean Special Area Management Plan.<sup>2</sup> Our organizations applaud the State of Rhode Island’s leadership to advance offshore wind power, which we believe can bring significant environmental and economic benefits to the region when developed responsibly and with careful attention to avoid, reduce and mitigate impacts to coastal and marine wildlife. Our primary concern in reviewing this project proposal is the health and status of North Atlantic right whales -- specifically the potential adverse impacts of increased underwater noise and vessel traffic on whales in this area.

Our organizations are deeply committed to the development of clean, renewable wind energy as expeditiously as possible and in an environmentally responsible manner. We support the development of offshore wind for its environmental and economic benefits, including access to a secure and sustainable energy source and mitigating the effects of climate change. The availability of offshore wind energy will facilitate our country’s move away from outdated fossil fuels that have caused devastating and ongoing damage to the environment and to public health.

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<sup>1</sup> The Vineyard Wind Coastal Zone Management Act, Consistency Certification (4903/WW CC), prepared pursuant to 15 C.F.R. 930.57, states that Massachusetts and Rhode Island share common coastal management issues and have similar enforceable policies and thus it has prepared a single certification for the Project for both states.

<sup>2</sup> [http://www.crmc.ri.gov/samp\\_ocean.html](http://www.crmc.ri.gov/samp_ocean.html). For the enforceable policies of the RI Ocean Special Area Management Plan see Chapter 11, Section 1160.

The deployment of offshore wind at scale off the coast of New England presents enormous opportunities for the New England states in pursuit of decarbonizing the electric generation sector. The State of Rhode Island has been a leader in this effort, with the nation's first offshore wind project in operation, the recent contract for 400 MW of the Revolution Wind project, and the potential to contract for an additional 400 MW of offshore wind in the next year. Our comments seek to ensure that Rhode Island retains its leadership role in the development of offshore wind resources while also leading in protection for vulnerable species in the marine ecosystem.

With these comments we seek to ensure that the state of Rhode Island does everything in its power during its federal consistency review to ensure that potential adverse effects of offshore wind on critically endangered North Atlantic right whales are mitigated to the fullest extent practicable.

## **I. Status of North Atlantic Right Whales**

As the State of Rhode Island is aware, the conservation status of the North Atlantic right whale is dire. Recent scientific analysis, considered the best available science by NOAA Fisheries,<sup>3</sup> confirms that the species has been declining since 2010 and only approximately 450 individuals were estimated to remain at the end of 2016. At least another 18 individuals have died since that time, leading NMFS to declare an Unusual Mortality Event (“UME”) in June 2017.<sup>4</sup> Moreover, females are more negatively impacted than males, now surviving to only 30-40 years of age with an extended inter-calf interval of approximately ten years.<sup>5</sup> To our knowledge, no calves have been born during the 2017 – 2018 season. If these trends continue, scientists predict the North Atlantic right whale may be functionally extinct in 20 years or less.<sup>6</sup> Given its critically endangered status, even minimal additional impacts have the potential to result in population-level impacts; therefore, it is imperative that all potential stressors acting on this species be minimized and mitigated to the full extent practicable.

In addition to the North Atlantic right whale, UMEs have also been declared for the Atlantic population of humpback whales in April 2017 and minke whales in January 2018.<sup>7</sup>

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<sup>3</sup> NOAA-NMFS, “North Atlantic right whale (*Eubalaena glacialis*): Western Atlantic stock,” February 2017. Available at: [https://www.nefsc.noaa.gov/publications/tm/tm241/8\\_F2016\\_rightwhale.pdf](https://www.nefsc.noaa.gov/publications/tm/tm241/8_F2016_rightwhale.pdf).

<sup>4</sup> NOAA-NMFS, “2017-2018 North Atlantic right whale Unusual Mortality Event.” Available at: <https://www.fisheries.noaa.gov/national/marine-life-distress/2017-2018-north-atlantic-right-whale-unusual-mortality-event>.

<sup>5</sup> Pace III, R.M, Corkeron, P.J., and Kraus, S.D., “State-space mark-recapture estimates reveal a recent decline in abundance of North Atlantic right whales,” *Ecology and Evolution*, vol. 7, no. 21, pp. 8730-8741 (2017); Kraus SD, “*Marine mammals in the Anthropocene: Keeping endangered from becoming extinct*,” Plenary speech, Society of Marine Mammalogy Biennial, Halifax, Canada (23 Oct 2017).

<sup>6</sup> Pace III, R.M, *et al.*, “State-space mark-recapture estimates reveal a recent decline in abundance of North Atlantic right whales,” *supra note 10*; *see also*, <https://www.theguardian.com/environment/2017/dec/10/north-atlantic-right-whales-extinct>.

<sup>7</sup> NOAA-NMFS, “2016-2018 Humpback whale Unusual Mortality Event along the Atlantic Coast.” Available at: <https://www.fisheries.noaa.gov/national/marine-life-distress/2016-2018-humpback-whale-unusual-mortality-event-along-atlantic-coast>; NOAA-NMFS, “2017-2018 Minke whale Unusual Mortality Event along the Atlantic Coast.” Available at:

Elevated numbers of humpback whales have been found stranded along the Atlantic Coast since January 2016, and in a little over two years, 63 humpback whale mortalities have been recorded (data through May 29, 2018), with strandings occurring in every state along the East Coast.<sup>8</sup> Twenty-nine minke whales have stranded between Maine and South Carolina from January 2017 to January 2018; at least 28 of those strandings resulted in mortality.<sup>9</sup> The declaration of three UMEs by the agency in the past year signals a large-scale shift of large whale habitat in the Atlantic, possibly resulting from prey species distributional shifts in response to climate change,<sup>10</sup> and/ or an increase in the abundance of certain prey species as a result of fisheries management,<sup>11</sup> and/ or other unknown factors. These shifts appear to direct whales further north and, in some cases, closer to shore, leading to elevated conflicts with human activities in those areas. The two primary causes of the strandings for all three species appear to be entanglement in fishing gear and vessel collisions.<sup>12</sup>

Considering the elevated level of threat to federally protected large whale species and populations in the Atlantic, including waters of Rhode Island, and emerging evidence of dynamic shifts in the distribution of large whale habitat, any stressors posed by the proposed Project, in state and federal waters, must be mitigated to the fullest extent practicable.

## II. Coastal Zone Management Act and Federal Consistency Review

The Coastal Zone Management Act of 1972 was enacted to encourage coastal states to be proactive in managing their natural resources for their benefit and the benefit of the Nation, recognizing a national interest in coastal resources. 16 U.S.C. § 1451. It is a voluntary program and if a state elects to participate it must develop and implement a coastal management program pursuant to federal requirements. *Id.* at 1455(d). Under the Act, federal actions, and the activities of non-federal applicants for federal authorizations and funding, within or outside the coastal zone that have reasonably foreseeable effects on any land or water use or natural resource of the coastal zone (also referred to as coastal uses or resources, or coastal effects) must be consistent to the maximum extent practicable with the enforceable policies of a coastal states federally approved Coastal Management Plan. *Id.* at 1456; 15 C.F.R. 930.11(g).

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<https://www.fisheries.noaa.gov/national/marine-life-distress/2017-2018-minke-whale-unusual-mortality-event-along-atlantic-coast>.

<sup>8</sup> *Id.*; see also, <https://www.newsday.com/long-island/suffolk/whale-washed-ashore-fire-island-1.18812449>.

<sup>9</sup> *Id.*

<sup>10</sup> Kessler, R., “A North Atlantic Mystery: Case of the Missing Whales,” *YaleEnvironment360* (November 26, 2013) (and citations therein). Available at: [https://e360.yale.edu/features/a\\_north\\_atlantic\\_mystery\\_case\\_of\\_the\\_missing\\_whales](https://e360.yale.edu/features/a_north_atlantic_mystery_case_of_the_missing_whales).

<sup>11</sup> Atlantic States Marine Fisheries Commission, “SEDAR 40 Stock Assessment Report: Atlantic Menhaden,” SEDAR, North Charleston, SC. 643 pp (2015); Buchheister, A., Miller, T. J., Houde, E.D., Secor, D.H., and Latour, R.J., “Spatial and temporal dynamics of Atlantic menhaden (*Brevoortia tyrannus*) recruitment in the Northwest Atlantic Ocean,” *ICES Journal of Marine Science*, vol. 73, no. 4, pp. 1147-1159 (2016).

<sup>12</sup> NOAA-NMFS, “North Atlantic right whale Unusual Mortality Event”; NOAA-NMFS, “2016-2018 Humpback whale Unusual Mortality Event along the Atlantic Coast”; NOAA-NMFS, “2017-2018 Minke whale Unusual Mortality Event along the Atlantic Coast.”

This federal consistency review gives states the authority to manage their resources in coordination with federal agencies by developing their own plans to manage coastal resources and then reviewing federal projects as well as projects receiving federal licenses and permits, to ensure they meet state standards. The Vineyard Wind Construction and Operations Plan contemplates activity in both state and federal waters and, among other requirements, is subject to the Rhode Island Office of Coastal Zone Management (CZM) Federal Consistency Review and Certification.

### **III. The Rhode Island Ocean Special Area Management Plan**

The federally approved Rhode Island Ocean Special Area Management Plan (“Ocean SAMP”) was adopted in 2010 and encompasses nearly 1500 square miles of ocean waters. It is administered by the R.I. Coastal Resources Management Council (CRMC), the state's coastal management agency. As discussed above, state CZMA federal consistency decisions must be based on the reasonably foreseeable coastal effects of the proposed activity and the states enforceable policies as approved by NOAA as part of the state’s federal approved CZMA program. To fulfill its mandate related to federal consistency review, the Ocean SAMP provides its enforceable policies in “Section 1600. Regulatory Standards.”

The third Overall Regulatory Standard states:

Offshore Developments *shall not have a significant adverse impact on the natural resources* or existing human uses of the Rhode Island coastal zone, as described in the Ocean SAMP. Where the Council determines that impacts on the natural resources or human uses of the Rhode Island coastal zone through the pre-construction, construction, operation, or decommissioning phases of a project constitute significant adverse effects not previously evaluated, the Council shall, through its permitting and enforcement authorities in state waters and through any subsequent CAMA federal consistency review, require that the applicant modify the proposal to avoid and/or mitigate the impacts or the Council shall deny the proposal.<sup>13</sup>

North Atlantic right whales are a natural resource that have been observed in and outside of the Ocean SAMP boundary area and must be adequately protected throughout their range both in Rhode Island state waters and in adjacent federal waters. For example, the Ocean SAMP notes their seasonal abundance (historically more likely in the spring and fall) and describes an event in April 2010 when nearly 100 North Atlantic right whales were spotted feeding in Rhode Island Sound.<sup>14</sup> In the absence of appropriate mitigation, the Vineyard Wind Project could have a significant adverse impact on North Atlantic right whales.

### **IV. Vineyard Wind’s Consistency Certification is Inadequate**

The Consistency Certification is inadequate because it fails to address the potential adverse impacts of this Project on North Atlantic right whales or any other marine mammal. A

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<sup>13</sup> Ocean SAMP Chapter 11 (Revision Adopted January 10, 2012), Section 1160.1 at p. 28 (bold and italics added).

<sup>14</sup> Chapter 2 (5-4-2011 Approved Ocean SAMP), at 88-90.

robust analysis of this issue is required because offshore wind developments may affect whales in the Project area, as well as in adjacent waters, in a number of ways including potential injury and harassment from noise during site assessment construction and operation, alterations of or interruptions to migration and feeding patterns, and vessel strikes.

Vessel collisions remain one of the leading causes of large whale injury and mortality. The Construction Operation Plan for the project states that the average number of vessels on sight during construction is expected to be approximately 23, with a maximum of up to 50 vessels, however, the full details appear to be redacted.<sup>15</sup> Similarly, the Draft Environmental Impact Report prepared for the Commonwealth of Massachusetts states that up to 45 vessels may be used for related activities, and an “average of 21 construction and installation vessels will operate during a typical work day.” Some of these vessels will work within the lease area and others will make daily round trip transits to/from the Project’s port facilities.<sup>16</sup> However, there are no details on the size of these vessels, the frequency and time of year of their trips, or the speed restrictions they will follow – all of which is needed to evaluate any potential impacts to North Atlantic right whales from increased risk of ship strikes. Moreover, even data available on incidence of vessel collision underestimates the actual number of animals struck, as animals struck but not recovered, or not thoroughly examined, cannot be accounted for.<sup>17</sup> North Atlantic right whales are particularly prone to ship-strikes given their slow speeds, their occupation of waters near shipping lanes, and the extended time they spend at or near the water’s surface.<sup>18</sup> Some types of anthropogenic noise have been shown to induce sub-surface positioning in North Atlantic right whales, displacing them into shipping lanes and increasing the risk of ship-strike at relatively moderate levels of exposure.<sup>19</sup> It is possible that offshore wind development activities could produce the same effects, and should therefore be treated conservatively.

Because it is reasonably foreseeable that the impacts of the Vineyard Wind Project in federal waters could have a significant adverse effects on North Atlantic right whales in Rhode Island’s coastal zone, and the Rhode Island whale watching and other ecotourism businesses that depend upon whales that occur in the Ocean SAMP boundary area, the federal consistency review must focus on these activities and provide mitigation to the fullest extent practicable, especially given the status of North Atlantic right whales. We note that Commonwealth of Massachusetts recently rejected the analysis in the Draft Environmental Impact Review and required Vineyard Wind to produce a supplemental filing to provide, among other things,

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<sup>15</sup> Vineyard Wind Construction and Operations Plan, Volume I, pp. 4-27, available at:

<https://www.boem.gov/webteam/Vineyard%20Wind/Vineyard-Wind-COP-Vol-I-Project-Info.pdf>.

<sup>16</sup> Vineyard Wind Connector Draft Environmental Impact Report EEA # 15787 (April 30, 2018), pp. 9-27, available at <https://offshoremwllc.app.box.com/s/pgsnwvte9llzu2akz9sp9ohz1i7awoze>.

<sup>17</sup> Reeves, R.R., Read, A.J., Lowry, L., Katona, S.K., and Boness, D.J., “Report of the North Atlantic Right Whale Program Review,” 13–17 March 2006, Woods Hole, Massachusetts (2007) (prepared for the Marine Mammal Commission); Parks, S.E., Warren, J.D., Stamieszkin, K., Mayo, C.A. and Wiley, D., “Dangerous dining: surface foraging of North Atlantic right whales increases risk of vessel collisions.” *Biology letters*, vol. 8, no. 1, pp. 57-60 (2011).

<sup>18</sup> NOAA-NMFS, Recovery plan for the North Atlantic right whale (August 2004).

<sup>19</sup> Nowacek, D.P., M.P. Johnson, P.J. Tyack, “North Atlantic right whales (*Eubalaena glacialis*) ignore ships but respond to alerting stimuli,” *Proceedings of the Royal Society B: Biological Sciences*, 271 (1536). pp. 227-23 (2004).

additional detail on mitigation measures for North Atlantic right whales based on comments filed by our organizations and others.<sup>20</sup>

## **V. Specific Recommendations on Effective Mitigation of Potential Impacts to North Atlantic Right Whales**

Any responsible approach to offshore wind development must take strong, precautionary action to safeguard North Atlantic right whales as they are frequently sighted and acoustically detected in the Massachusetts Wind Energy Area and surrounding waters. To be consistent with all applicable laws, best management practices (“BMPs”) must be in place to demonstrate that sufficient actions will be taken to protect this critically endangered species. Our organizations endorse the measures outlined below as BMPs for the protection of the North Atlantic right whale during wind energy development off the U.S. East Coast. The BMPs are designed to: (i) reduce co-occurrence of development activities with this sensitive species; (ii) minimize and mitigate any impacts that do occur to the maximum extent practicable; (iii) reduce risk of vessel collisions throughout the life of the Project; and (iv) ensure effective long-term monitoring of the health of marine life present at the new offshore wind site to help guide the development of the American offshore industry.

### (1) Site selection

Offshore wind projects should not be sited in, at minimum, North Atlantic right whale foraging or calving critical habitat, as defined under the Endangered Species Act, until peer-reviewed scientific research determines that offshore wind activities will not adversely impact North Atlantic right whales or modify their behavior or habitat.

### (2) Temporal restrictions on geophysical surveys and construction

Construction activities and geophysical surveys with noise levels that could cause injury or harassment in marine mammals must not occur during periods of highest risk to North Atlantic right whales, defined as times of highest relative density of animals during their migration, and times when mother-calf pairs, pregnant females, surface active groups (indicative of breeding or social behavior), or aggregations of three or more whales (indicative of feeding or social behavior), are expected to be present, as supported by best available science.

Geophysical survey and pile driving activities should commence, with ramp-up, during daylight hours only to maximize the probability that North Atlantic right whales are detected and confirmed clear of the exclusion zone (see, also, (3), below). The activity can then continue into nighttime hours. If a right whale is detected in the exclusion zone during nighttime hours and the activity is shut down, developers must wait until daylight hours for ramp-up to commence.

### (3) Exclusion zones and exclusion zone monitoring during geophysical surveys and construction

For the North Atlantic right whale, a minimum exclusion zone of 1,000 meters should be established around all vessels conducting activities with noise levels that could result in injury or harassment to these species (e.g., geophysical surveys and pile driving).

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<sup>20</sup> See June 15, 2018 Certificate of the Secretary of Energy and Environmental Affairs on the Draft Environmental Impact Report for the Vineyard Wind Connector, p. 27.

To maximize the probability of detection of North Atlantic right whales, comprehensive exclusion zone monitoring is essential. At minimum, a combination of certified Protected Species Observers (“PSOs”) and passive acoustic monitoring should be required at all times. Staffing and shift-schedules should allow for each PSO to monitor a maximum of 180° during daylight hours. Aerial surveys would also provide a useful supplement to increase detection probability. At night, a combination of night-vision, thermal imaging technology, and passive acoustic monitoring should be used.

(4) Vessel speed restriction for the lifetime of the Project

Ship strikes are one of the leading causes of mortality for large whales, including the North Atlantic right whale. Probability of serious injury or mortality significantly increases when vessels of any length are traveling at speeds greater than 10 knots. Therefore, all vessels operating within or transiting to/from lease areas should observe a speed restriction of 10 knots during times when mother-calf pairs, pregnant females, surface active groups, or aggregations of three or more whales, are expected to be present based on best available science.

(5) Reduction of underwater noise during construction

During construction, developers should commit to minimizing impacts of underwater noise on the North Atlantic right whale to the full extent practicable through: (i) the consideration and use of foundation types and installation methods that eliminate or reduce noise; and (ii) the use of technically and commercially feasible and effective noise attenuation measures, including the use of the lowest practicable source level.

(6) Commitment to scientific research and long-term monitoring

Developers should commit to carry out scientific research and long-term monitoring in lease areas to advance understanding of the effects of offshore wind development on marine and coastal resources, and the effectiveness of mitigation technologies (e.g., noise attenuation, thermal detection). Science should be conducted in a collaborative and transparent manner, utilizing recognized marine experts, engaging relevant stakeholders, and making results publicly available. Developers should coordinate with state and regional scientific efforts to ensure results from individual lease areas can be interpreted within a regional context and contribute to the generation of regional-scale data, which is required to address questions related to population-level change and cumulative impacts across the geographic range of the North Atlantic right whale.

(7) Contribution to species conservation efforts

As a broad commitment to species conservation efforts, offshore wind developers should support mitigation approaches and strategies to reduce other stressors facing potentially affected species such as the critically endangered North Atlantic right whale.

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In conclusion, we reiterate our support for responsibly developed offshore wind power and applaud the actions to date to advance this important climate and clean energy solution. We look forward to working together to ensure that all projects built meet the federal consistency requirements of the CZMA through compliance with Rhode Island’s Ocean SAMP and are

developed responsibly with strong protections in place for our most vulnerable coastal and marine wildlife.

Sincerely,

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