



State of Rhode Island  
**Coastal Resources Management Council**  
Oliver H. Stedman Government Center  
4808 Tower Hill Road, Suite 3  
Wakefield, RI 02879-1900

(401) 783-3370  
Fax (401) 783-2069

July 9, 2020

Program Manager  
Office of Renewable Energy Resources  
Bureau of Ocean Energy Management  
45600 Woodland Road  
Sterling, Virginia 20166

Subject: Vineyard Wind COP Supplement to the Draft EIS; BOEM-2020-0005

To whom it may concern,

The Rhode Island Coastal Resources Management Council (RICRMC) is providing these comments as a cooperating agency in the preparation of the above referenced EIS for the Vineyard Wind offshore wind project located within BOEM Lease Area OCS-A 0501. The RICRMC strongly encourages BOEM to adopt Alternative D2 in the EIS as the preferred alternative for the Vineyard Wind project and require the developer to construct the wind farm in a uniform grid pattern with 1 x 1 nautical mile spacing between all turbine foundations (including the OSS platforms) in an East-West, North-South orientation as recommended by the U.S Coast Guard in their June 14, 2020 final Massachusetts Rhode Island Port Access Route Study (MARIPARS). We request BOEM to require the USCG MARIPARS recommended wind farm configuration as a condition of COP approval not only for the Vineyard Wind project, but for all southern New England offshore wind projects.

The Alternative D2 configuration in a uniform grid of 1 x 1 nautical mile spacing between all turbine foundations (including the OSS platforms) in an East-West, North-South orientation is entirely consistent with the MARIPARS recommendation and the offshore wind industry's November 1, 2019 collaborative proposal for wind farm layout in the southern New England offshore renewable energy lease areas. The RICRMC believes it is imperative that BOEM condition all COP approvals accordingly so that there is regulatory certainty for the offshore wind industry and stakeholders with assurance that there will be a predictable and uniform wind farm pattern that accommodates and facilitates safe navigation, commercial and recreational fishing activities, and USCG search and rescue operations. In addition, we are mindful of federal law that governs development activities on the outer continental shelf (OCS) that requires "the right to navigation and fishing therein shall not be affected." See 43 U.S. Code § 1332. We expect BOEM to conduct its NEPA review of the Vineyard Wind project, and all other southern New England wind farm projects on the OCS, in accordance with this federal law.

Lastly, although not a consideration within the Vineyard Wind EIS, the RICRMC strongly recommends that BOEM require as a condition of COP approval the installation of automatic identification system (AIS) transmitters on all turbine and electric service substation foundations for each and every wind farm project within the southern New England lease areas to increase navigational safety, especially under less than ideal navigation conditions. Stakeholders have expressed concern that under some circumstances there is the potential for vessel radar interference resulting from wind turbine generator (WTG) foundations. The USCG addressed this issue in the recent MARIPARS report and concluded that “the USCG is not aware of an authoritative scientific study that confirms or refutes the concern that WTGs will degrade marine radar.” See MARIPARS report (June 14, 2020) at 25. Despite the uncertainty of vessel radar degradation within a wind farm, AIS transmitters on WTG foundations would provide safety equipment redundancy and allow a vessel operator to “see” foundation locations on a vessel chart plotter without the aid of radar. Thus, if radar degradation becomes an issue or radar malfunction occurs, the AIS on WTG foundations would provide additional navigation safety. Accordingly, BOEM should condition all wind farm COP approvals with a requirement for the installation of AIS transmitters on all offshore wind farm structures.

#### Specific comments on the SEIS document

#### **ES4. Alternatives; page ES-2**

The last sentence in Footnote 3 should be modified to reference the applicable BOEM regulations and to indicate that BOEM will condition that any movement in turbine foundations will not result in diagonal lanes less than 0.6 NM as follows: "BOEM will require as a condition of COP approval that any movements in turbine location, as may be permissible pursuant to 30 CFR 585.634, should not shrink the diagonal lanes to less than 0.6 nautical mile."

The BOEM regulations permit micro-siting of turbine foundations within 500 feet of the COP designated location. However, if two opposing turbine foundations located along a diagonal lane were moved towards one another in the direction of the center line of the diagonal lane the maximum allowed distance of 500 feet, then the diagonal lane between them would result in a distance of less than 0.6 NM ( $0.7 \text{ NM} = 4254 \text{ feet} - (500 + 500) = 3254 \text{ feet.}$ , which is less than 0.6 NM (3646 feet)). Thus, in such a circumstance the 3254 foot (0.54 NM) distance would not meet the USCG recommended minimum diagonal lane width of 0.6 NM for the northwest to southeast direction.

#### **ES4.2 Comparison of Impacts by Action Alternative; page ES-3**

This section should highlight within the text on page ES-3 that Alternative D2 is the only project alternative that BOEM indicates within Table ES-2 that would have moderate cumulative impacts only on navigation and vessel traffic as compared to all other alternatives, which may have major cumulative impacts.

### **2.1; Table 2.1-1; page 2-1**

The Alternative D-2 description should include language that clearly indicates that this particular alternative is the only alternative being considered by BOEM that is consistent with the USCG recommendations for a uniform wind farm layout as specified in Section VI on page 38 of the USCG MARIPARS Final Report (May 14, 2020) and as is described in the SEIS in § 2.2.2, p. 2-5. In addition, Footnote 1 should be modified as recommended above in ES-2.

### **2.2.2; page 2-5**

Now that the USCG has issued its MARIPARS Final Report on May 14, 2020 the last paragraph on page 2-5 (and ending on page 2-6) should be modified to reflect the USCG recommendation on vessel transit lanes.

### **3.11.1.1; page 3-97**

There are references to the USCG MARIPARS as a "Draft" report within this section on page 3-97. Now that the USCG report is final as of May 14, 2020 this section and similar text in other sections throughout the SEIS, including the appendices, should be revised to reflect the final USCG MARIPARS report status along with its recommendations. There are 26 occurrences within the SEIS referencing the MARIPARS report as "Draft."

### **3.11.2.4; page 3-102**

The discussion within the fourth paragraph on this page should indicate that Alternative D2 is entirely consistent with the final USCG MARIPARS report recommendation for wind farm layout and orientation.

### **3.13.2.3; page 3-115**

Now that the USCG MARIPARS report is final, this section should include added text that indicates that Alternative D2 is consistent with the USCG MARIPARS recommendations for a uniform 1x1 NM grid oriented with East-West rows and North-South columns as described within § 3.13.2.4 on page 3-116.

### **3.13.2.4; page 3-116**

Similar text describing Alternative D2 as consistent with the MARIPARS recommendations as found in §§ 3.13.2.4 (page 3-116), 3.13.2.5 (page 3-117) and 3.14.2.3 (page 3-129) should be added to any discussion of Alternative D2 throughout the SEIS.

### **3.14.2.4; page 3-131**

The text of the last paragraph in this section should reflect the USCG final MARIPARS report status and recommendation regarding transit corridors.

**A.4; page A-9**

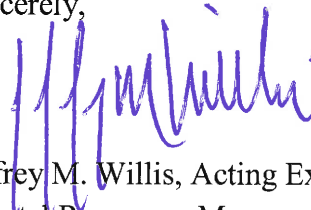
The discussion on this page should reference the final USCG MARIPARS report and its recommendations concerning additional transit corridors.

**C.1.17; page C-5**

The second paragraph should be modified to reflect the final MARIPARS report status and recommendations for a uniform 1x1 NM grid oriented East-West and North-South in the southern New England WEA. In addition, since this section indicates that there is sufficient information for BOEM to make a reasoned choice among the alternatives, it would reason that this section should also indicate that Alternative D2 is consistent with the MARIPARS recommendation as well as the collaborative proposal put forth by the five southern New England offshore wind leaseholders on November 1, 2019 for a uniform 1x1 NM wind farm layout for the entire southern New England WEA.

The RICRMC appreciates the opportunity to provide comments on the Vineyard Wind EIS and the work that BOEM has completed to date on this project to include the collaborative input from the cooperating agencies. The RICRMC stands ready to assist BOEM further as necessary. Please contact me [jwillis@crmc.ri.gov](mailto:jwillis@crmc.ri.gov) or James Boyd [jboyd@crmc.ri.gov](mailto:jboyd@crmc.ri.gov) of my staff should you have any questions concerning these comments.

Sincerely,



Jeffrey M. Willis, Acting Executive Director  
Coastal Resources Management Council

/lat

cc Council members  
Anthony DeSisto, CRMC Legal Counsel