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CRMC File No. 2023-02-090
SouthCoast Wind Energy, LLC
CRMC Staff Report
June 9, 2026

Introduction:

SouthCoast Wind Energy LLC (formerly known as Mayflower Wind Energy LLC) has applied to the Rhode Island Coastal Resources Management Council (CRMC) for the proposed construction, operation and maintenance of two submarine power export cables associated with SCW's offshore renewable wind energy project in federal waters. The offshore power export cables will travel from federal waters through the Sakonnet River, make landfall in the Town of Portsmouth crossing Aquidneck Island, and re-enter the water in Mount Hope Bay before continuing to Brayton Point in Somerset, Massachusetts.

For the purposes of this staff report, the location and burial of the export cable bundle and the cable's intermediate landings on Aquidneck Island in the Town of Portsmouth, Rhode Island will be referred to collectively as "the Project" except where the components are identified for individual discussion and evaluation. The applicant is referred to as "SouthCoast Wind," "SCW," or "the applicant." For additional information regarding portions of the Project occurring within federal waters, refer to the Bureau of Ocean Energy Management's (BOEM) SouthCoast Wind project page: https://www.boem.gov/renewable-energy/state-activities/southcoast-wind-formerly-mayflower-wind

CRMC staff and the SouthCoast Wind Project Team have met extensively since 2023 to discuss matters associated with the potential effects of the proposed Project to Rhode Island's coastal uses and resources. In addition, SouthCoast Wind supported CRMC's decision in early 2025 to solicit a new Fishermen's Advisory Board (FAB), and SouthCoast Wind participated in several FAB meetings between May and December 2025. The following staff analysis details the issues, discussions, and any resolutions or outstanding matters associated with the Project.

1. Project Description:

1.1 Cable Route:

The Project proposes to install two high voltage direct current (HVDC) submarine power cable bundles and associated communications cabling within an export cable corridor (ECC) in Rhode Island state waters and via an overland route in the Town of Portsmouth. The HVDC

cable bundles would be composed of two, ±320 kilovolt (kV) single-core armored submarine cables and may include a fiberoptic cable embedded within the cable's armor layer.[1] The cable bundles would be approximately 20.3 miles in length within Rhode Island state waters including Rhode Island Sound (5.3 miles), the Sakonnet River (11 miles), and Mount Hope Bay (4 miles).[2] Additionally, the ECC route would utilize an approximately two-mile long overland route across Aquidneck Island through the Town of Portsmouth.[3] One landfall construction area is located on the northeast side of Portsmouth. A second landfall construction area is located on the northwest side of Portsmouth. The proposed ECC would be installed in CRMC Type 2 low intensity use waters and Type 4 multipurpose waters.[4]

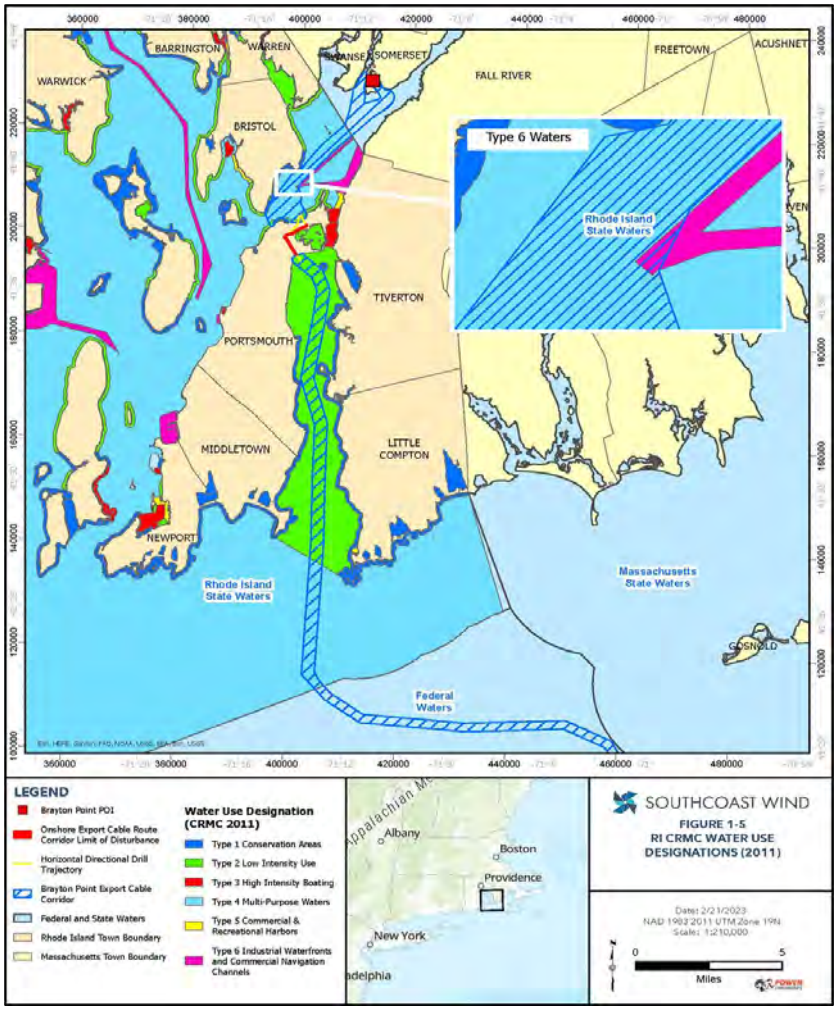

Figure 1: SCW ECC route in Rhode Island state waters.

[1] *See* SouthCoast Wind CRMC Category B Assent Application as updated September 30, 2024, §§ 2 at 2-1; Table 2-3 at 2-4 [hereinafter SCW Assent Application].
[2] *See* SCW Assent Application §§ 2 at 2-1; Table 2-3 at 2-4.
[3] *Id*. at 2-13.
[4] *See* 650-RICR-20-00-1.2.1(A), (C), (E) defining CRMC Water Types; *see also* CRMC Water Type Classification Maps https://www.crmc.ri.gov/maps/maps_wateruse.html.

1.2 Seabed Preparation:

Prior to cable installation, the seabed along the length of the ECC will be prepared for cable burial. Pre-installation surveys will be conducted to check for debris and obstructions along the cable corridor and inform cable micro-routing/siting. Seabed preparations will include the following steps: 1) boulder removal to remove boulders that cannot be avoided by micro-routing, 2) a pre-lay grapnel run (PLGR) along the centerline of the cable route to clear seabed debris, and 3)pre-lay surveys using either vessel-mounted or remote operated vehicle (ROV)-mounted cameras.[5] Boulder clearance will be done via a boulder grab or a boulder plow. A boulder grab will locally remove and re-locate individual boulders, and a boulder plow may be used where there are denser boulder fields. The PLGR is expected to take less than one week of in-water work time.[6] Debris and obstacles removed via the PLGR such as abandoned mooring lines, wires, or derelict fishing gear (i.e., ghost gear), will be brought aboard the vessel and disposed of responsibly.

Throughout the seabed preparation and cable installation process, SCW will communicate directly with the fishing industry, representatives, and state management agencies to provide locations of relocated boulders and to avoid potential gear hangs. SCW's Fisheries Manager will also "provide maps and precise coordinates of relocated boulders through Local Notices to Mariners and shared with the RI [Dept. of Marine Fisheries]."[7]

1.3 Cable Installation Process:

Cable installation would follow a construction sequence that will include pre-lay and post-lay cable surveys and route engineering, seabed preparation, pipeline crossing preparation, cable installation and burial, offshore joint construction, and secondary cable protection.[8] SCW intends to utilize a simultaneous cable lay and burial method using a jet-plow or jet-sled type burial tool, though multiple tools will be available to achieve suitable cable burial depth.[9] Cables would be buried to a target depth range of 3.2 to 13.1 feet below the seabed, with a target burial depth of approximately 6 feet.[10] Cable burial will occur within a cable corridor that is between 1,640 feet to 2,300 feet wide.[11] The expected width of seabed disturbance from installation within the corridor will be approximately 20 feet.[12]

1.4 Cable Protection/Crossings & Seabed Disturbance:

SCW conservatively estimates that 15% of the ECC will require secondary cable protection.[13] Areas that require secondary cable protection include up to three cable/pipeline

[5] *See* SCW Assent Application § 2.3.4 at 2-7.
[6] *See* SCW Assent Application Table 2-2 at 2-3.
[7] *See* SCW Assent Application § 2.3.4 at 2-7.
[8] *Id*. at 2-5
[9] *See* SCW Assent Application Table 2-6 at 2-8
[10] *See* SCW Assent Application § 3.2.1.3 at 3-21.
[11] *Id*. at 3-17.
[12] *Id*. at 3-21.
[13] *Id*. at 2-10.

crossings in the Sakonnet River, areas where cable burial depth cannot be achieved such as areas of harder seabed in Rhode Island Sound, and one or more offshore cable joints. Types of secondary cable protection that may be used include the creation of a rock berm, concrete mattress placement, rock placement, fronded mattresses, and half shells for cable ends at pull-in areas.[14] Offshore cable joints will be in an "in-line" or "omega" configuration, post-buried, and may require secondary cable protection.[15]Any cable protection necessary to protect segments of the export cable or existing utilities is considered placement of fill in state waters and must be installed in accordance with the Project's Water Quality Certification/Dredge Permit and the CRMC Assent Stipulations unless otherwise stated.[16]

Seabed disturbance is expected to be largely temporary and permanent only in areas where secondary cable protection is required. SCW estimates approximately 137 acres of total temporary disturbance in Rhode Island waters. This estimate includes seabed preparation (25.3 acres), cable installation (94.9 acres), and cable protection (15.2 acres).[17] The total area of disturbance conservatively assumes that cables will be unbundled, meaning estimates are based on two separately installed cables. However, where practicable, SCW will install the offshore export cables in a bundled configuration which would reduce the estimated seabed disturbance areas by approximately half.[18]

1.5 Rhode Island DEM Water Quality Certificate & Marine Dredge Permit:

In addition to a CRMC Assent, the activities associated with the installation of the export cables within state waters also require a State of Rhode Island Dredge Permit in accordance with the Marine Infrastructure Maintenance Act of 1996 and the Marine Waterways and Boating Facilities Act of 2001, (RIGL Chapter 46-6.1), and a State of Rhode Island Water Quality Certification (in accordance with RIGL Chapter 42-35 pursuant to Chapters 46-12 and 42-17.1). The Rhode Island Department of Environmental Management (RIDEM) is responsible for issuing the Water Quality Certification and Marine Dredge Permit. The RIDEM issued both the Water Quality Certification (WQC File Number 23-044) and Marine Dredge Permit (Application Number DP-23-198) for the SCW project on March 14, 2024.

1.6 Export Cable Sea-to-Shore Landing & Shore-to-Sea Transition:

Offshore export cables will connect to the regional transmission system at Brayton Point in Somerset, Massachusetts and will travel overland at Portsmouth, Rhode Island. The sea-to-shore and shore-to-sea transition will occur via horizontal directional drilling (HDD) and will result in the construction of a total of eight HDD offshore pits (i.e., four HDD conduits).[19] Four

[14] *Id.*
[15] *Id.* at 2-9.
[16] *See* infra Section 1.5; *see also* RIDEM Water Quality Certification File Number 23-044/Dredge Permit Application Number DP-23-198 at 1-2.
[17] *See* SCW Assent Application Table 3-6 at 3-22.
[18] *Id.* at note d.
[19] Eight HDD offshore pits is equivalent to four HDD conduits.

HDD offshore pits will be in the Sakonnet River and four will be in Mount Hope Bay.[20] HDD conduits will travel sea-to-shore, and vice versa, below the coastal features, coastal beaches and intertidal zones on the Sakonnet River and Mount Hope Bay sides of Portsmouth. Use of HDD at landings avoids disturbance of nearshore finfish, nearshore productive shellfish beds, invertebrates, Essential Fish Habitat (EFH), and sensitive habitats (e.g., submerged aquatic vegetation/SAV beds) to the extent practicable and minimizes spatial and temporal effects to benthic organisms.

Two landfall construction areas will be utilized in support of HDD construction. One landfall site will be on the northeast side of Portsmouth and will occupy the corner of Boyds Lane and Park Avenue. The other construction area will be on the northwest (Mount Hope Bay side) of Portsmouth within either the Montaup Country Club parking lot or within land owned by Roger Williams University on the northern side of Anthony Road (RWU North parcel alternate). Two underground onshore HVDC export cables and communications cabling will be co-located in a single underground duct bank and manhole system through the proposed onshore cable route.

Figure 2: Onshore Construction Corridor

[20] *See* SCW Assent Application § 2.4 at 2-11. Two conduits will accommodate two power cables/communications cables for delivery of approximately 1,200 MW of offshore renewable wind energy. The remaining two conduits would be installed to accommodate potential future installation of an additional 1,200 MW.

1.7 Electromagnetic Fields (EMFs):

No regulatory thresholds or guidelines for allowable EMF levels in marine environments have been established for either HVDC or HVAC transmission. There is a growing body of evidence suggesting that EMFs from HVDC cables may be perceptible to some electromagnetic (EM)-sensitive marine species, but there remains a lack of evidence indicating potential harmful impacts at the population- or community level for the various types of marine species which may experience exposure to DC EMFs from submarine export cables.[21] This conclusion regarding a lack of evidence of population-level harms to marine species from HVDC-related EMFs is supported by findings from recent governmental reports and expert state of the science reviews.

A BOEM sponsored study in 2019 concluded, based on its review of the state of the knowledge regarding potential EMF-related impacts on marine life, "The operation of offshore wind energy projects is not expected to negatively affect commercial and recreational fishes within the southern New England area. Negligible effects, if any, on bottom-dwelling species are anticipated. No negative effects on pelagic [i.e., in upper layers of the open sea] species are expected due to their distance from the power cables buried in the seafloor."[22]

In 2024, BOEM updated its review of expert state of the science literature and concluded that "exposure to EMF emissions from offshore wind farms could elicit a response from electro- and magneto-sensitive species. However, any effects are anticipated to be species-specific, limited to individuals in the immediate vicinity, and biologically non-significant."[23]

CRMC has heard from many stakeholders about concerns regarding EMF impacts on the local environment. SouthCoast Wind estimates a change to ambient EMF to be peaking at 123 mG for a typical installation of buried at the targeted depth. This is a significant reduction when compared to improper burial which is estimated to peak at 3,785 mG. Staff, in consultation with subject matter experts determined that based on available science, potential impacts can be mitigated by the developer achieving CRMC recommended cable burial depth.[24] According to BOEM's review of expert state of the science literature, most export cables are buried to a target depth of between 3 and 6 feet and increasing the burial depth from 3 feet to 6 feet reduces the magnetic field at the seafloor approximately four-fold.[25]

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[21] *See* Assent Application at 3-53 & 3-54.

[22] CSA Ocean Sciences Inc.; Exponent. 2019. "Evaluation of Potential EMF Effects on Fish Species of Commercial or Recreational Fishing Importance in Southern New England." Report to US Department of the Interior, Bureau of Ocean Energy Management (BOEM). OCS Study BOEM 2019-049, 62p.

[23] BOEM White Paper 2024-055, *Electromagnetic Fields: Background and Potential Impacts of Offshore Wind Farms on Marine Organisms* (August 2024), pg. 68. Link: https://www.boem.gov/sites/default/files/documents/environment/environmental-assessment/BOEM_2024-055_WP.pdf

[24] *See* John W. King, *Review of Benthic Geologic Habitat Mapping and EMF Considerations: for the Proposed South Coast Wind Energy Cable Corridor*, 4 (2023).

[25] BOEM, *Environmental studies: Electromagnetic fields (EMF) from offshore wind facilities* (December 2023); Link: https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/BOEM-Electromagnetic-Fields-Offshore-Wind-Facilities_1.pdf

Staff determined the need to achieve a target cable burial design depth of 4 to 6 feet along the entire cable route. Recommended stipulation 8 has been added to this report to address this need.

1.8 Procedural History:

SouthCoast Wind submitted their Category B Assent and Freshwater Wetlands permit application to CRMC on February 24, 2023. Upon review, staff provided several comments and questions in the form of Requests for Information (RFIs) and noted that the application was considered incomplete due to lack of proof of ownership over several areas along the land route. In response, SouthCoast Wind provided responses to all CRMC RFIs and submitted more information regarding site control along the onshore export cable route. SouthCoast Wind submitted an updated application with additional information to address CRMC RFIs on March 6, 2023. At the request of CRMC, SouthCoast Wind submitted updated application appendices on July 2, 2024, and another updated application on September 30, 2024. CRMC deemed the September 2024 application complete on October 29, 2024. CRMC then issued a public notice on November 13, 2024, and held a 68-day public comment period on the application which concluded on January 20, 2025. During this multi-year review, SouthCoast Wind held regular bi-weekly meetings with both CRMC and RIDEM staff. This is in addition to any as needed meetings that were requested.

Starting in May 2022, SouthCoast Wind has engaged with the Fishermen's Advisory Board (FAB) and the Habitat Advisory Board (HAB) about the Project.[26] This engagement includes meetings with the former FAB, that resigned in August 2023, and the newly formed FAB that was ratified by the Council on April 8, 2025.

On January 28, 2025, over a year and seven months after the former FAB resigned, the CRMC put out a notice[27] seeking volunteers willing to serve on the FAB. After a several months-long search, CRMC appointed new members to its FAB who were approved by the Council on April 8, 2025. On April 17, 2025, CRMC staff held a meeting with the FAB to introduce the SouthCoast Wind Project. On May 5, 2025, the FAB, HAB, CRMC staff, RI DEM DMF staff, SouthCoast Wind, and resource economist experts from the Woods Hole Oceanographic Institution (WHOI) met on the University of Rhode Island Narragansett Bay campus. During this in-person meeting, SouthCoast Wind provided an overview of the Project and WHOI presented the report titled, "*Project's Baseline Value of Commercial Fisheries Landings from the SouthCoast Wind Export Cable Corridor in Rhode Island State Waters*", referred to as the "Fisheries Economic Baseline Assessment" for the FAB and HAB's

[26] Initial meetings in 2022 pertained to the federal consistency review of the SouthCoast Wind export cable corridor in federal waters. While the offshore cable corridor was the focus of these early meetings, the project as a whole was generally discussed including the cable corridor in state waters.
[27] https://www.crmc.ri.gov/news/2025_0128_fab.html

consideration and feedback. The Fisheries Economic Baseline Assessment had previously been distributed to the FAB and HAB by CRMC on April 11, 2025. The FAB, HAB, SouthCoast Wind, CRMC staff, RI DEM DMF staff, and WHOI met virtually on May 22, 2025 to review and discuss updates made to the Fisheries Economic Baseline Assessment based on feedback received from the FAB and HAB at the previous May 5, 2025 meeting. On June 20, 2025, SouthCoast Wind provided the FAB and HAB, via CRMC staff, the report titled, "*Commercial Fisheries Landings and For-Hire Charter Fishing Revenue Exposure to the SouthCoast Wind Export Cable Corridor in Rhode Island State Waters*", referred to as the "Fisheries Exposure and Impact Report" from WHOI for the FAB and HAB's review. The FAB, HAB, SouthCoast Wind, CRMC staff, RI DEM DMF staff, and WHOI met virtually on July 16, 2025 to discuss the results of the Project's Fisheries Exposure and Impact Report that were presented by WHOI for the FAB and HAB's consideration and feedback.

Alongside these initial meetings, SouthCoast Wind responded in writing to the FAB, HAB, and CRMC staff on a series of questions raised during engagements. Responses to questions and comments were formally shared on June 6, 2025, and on July 22, 2025. The Project's Fisheries Exposure and Impact Report also described updates that were made to the analysis as a direct result of feedback from the FAB and HAB.

On July 25, 2025, SouthCoast Wind provided a draft Fisheries Compensatory Mitigation Memorandum of Understanding (MOU) to CRMC staff for sharing with the FAB and HAB, which was based on the Fisheries Exposure and Impact Report conducted by WHOI and amended to account for feedback received. On September 24, 2025, a repeat of WHOI's July 16, 2025 Fisheries Exposure and Impact presentation was made to reorient the FAB, including a new member who joined the FAB after the initial SouthCoast Wind meetings were conducted (the new member was ratified by the Council on July 22, 2025). During this time, CRMC staff met with FAB members regularly to discuss FAB structure, the Project, and potential legal representation. CRMC coordinated all meetings with the FAB and HAB and provided proper notice and opportunities via schedule polling options in attempts to accommodate as many members as possible.

In response to the FAB expressing interest in the option for legal representation, SouthCoast Wind provided CRMC staff with a list of attorneys with fisheries backgrounds on August 14, 2025 to assist in the search process. From August 2025 through January 2026, the CRMC considered other attorneys in addition to those provided by SouthCoast Wind. CRMC and the FAB were unable to reach mutual agreement on the selection of legal representation despite numerous attempts and candidates reviewed. As 650-RICR-20-5-11.10.1(G) establishes mitigation as a negotiation among CRMC staff, the FAB, and the project developer with final approval by the Council, the FAB holds no unilateral authority to select legal representation for that negotiation, and any such selection requires the mutual agreement of the FAB and CRMC staff. Having been unable to reach that agreement, CRMC staff communicated to the FAB in January 2026 that it would proceed without legal representation, while noting that a mediator

and/or an independent resource economist may be engaged to support the compensatory mitigation discussion.

In January 2026, FAB members communicated to the CRMC their capacity as an advisory body an interest in engaging Dr. Todd Guilfoos, a resource economist at the University of Rhode Island, as a CRMC subject matter expert to support the mitigation negotiation process. CRMC staff and the FAB mutually agreed that a resources economist would meaningfully assist in mitigation negotiations. In response, SouthCoast Wind worked with CRMC's external legal counsel on a consultant agreement to engage Dr. Guilfoos, which enabled SouthCoast Wind to pay his reasonable consulting fees directly pursuant to 650-RICR-20-05-11.9.8(F). On February 18, 2026, a fully executed Consultant Agreement with Dr. Guilfoos was sent by CRMC's counsel to SouthCoast Wind. After execution of the Consultant Agreement, SouthCoast Wind met with Dr. Guilfoos multiple times to orient him to the Project and previous engagements with the FAB and HAB, and discuss how feedback has been addressed to date.

2. CRMC staff conclusion and recommendations

SouthCoast Wind has endeavored to minimize the impacts of the project through construction methods, design, and location of the activities. SouthCoast has worked with both federal and state regulatory authorities, including but not limited to Bureau of Ocean Energy Management (BOEM), CRMC and RIDEM, as well as other interested parties. Despite the effort to minimize impacts, in some cases impacts are unavoidable. These include permanent alteration to the benthic habitat from a soft bottom to hard bottom from secondary cable protection, along with impacts to fishing communities. SouthCoast has offered mitigation compensation to address these impacts on the fishing communities.

In this application, SouthCoast has outlined a set of performance standards and process steps that address the regulatory review by CRMC staff. Staff defer to the Council for consideration of the staff report and the substantive testimony expected during the public hearing process. It is also in the opinion of staff that the material submitted for this application is sufficient to move into final design.

3. Project Need

At an Open Meeting on November 4, 2025 (Docket No. SB-2022-02), the Rhode Island Energy Facility Siting Board (EFSB or Board) found that, based on the evidence presented by SouthCoast Wind at the EFSB hearings, transmission facilities are needed to meet the needs of the state and/or region for energy of the type to be transmitted by the proposed facilities and that the SCW transmission project is cost justified and will transmit energy at the lowest reasonable cost to Rhode Island ratepayers.

On January 22, 2026, the Board issued a Final Decision and Order granting a license for SouthCoast Wind to construct, operate and maintain the Project, subject to certain conditions.[28]

Key findings of Rhode Island's 2025 Climate Action Strategy (RICAS), approved by the Rhode Island Executive Climate Change Coordinating Council (EC4) in December 2025, specify that achieving the Action on Climate's 2030 GHG reduction target will depend heavily on continued compliance with the Rhode Island RES and the ongoing decarbonization of the ISO-NE grid. The RICAS concluded that uncertainties due to federal policy changes in 2025 reinforce the need for continued action and innovative thinking.[29]

4. Potential Environmental Impacts:

The following is a staff evaluation and analysis of potential environmental impacts associated with the SouthCoast Wind project. The evaluation includes potential impacts during construction and operation. Of particular interest are the impacts on certain species of marine fish, marine mammals, marine reptiles, Submerged Aquatic Vegetation, amphibians, bats, and marine and terrestrial birds.

4.1. Submerged aquatic vegetation (SAV):

CRMC has particular interest in the protection of eelgrass (Zostera marina) and widgeon grass (Ruppia maritima) as both have high habitat value. These species are found closest to the shore in shallow water.

The SouthCoast Wind project does not pose a significant threat to SAV. The export cable and its associated area of disturbance and possible sediments deposition will not be close enough to shore to affect any known or surveyed locations of SAV. The nearest locations are near the mouth of the Sakonnet River near shore with the closest site located over 0.62 miles (1 km) away from the edge of the export cable corridor. This distance combined with the moving nature of the work and the limited amount of sediment deposition will not cause significant accumulation. The area will be re-surveyed for SAV prior to construction to guide HDD placement to avoid impacts to SAV as outlined in mutually agreed upon conditions in the Project's 401 Water Quality Certificate and Marine Dredging Permit issued by RIDEM.

4.2. Benthic Species:

Impacts to Benthic Species that live in or on the ocean bottom sediment including but not limited to blue mussels, sessile gastropods, mollusks, conch, ocean quahogs, mantis shrimp and

[28] RI EFSB Final Decision and Order 173 issued on January 22, 2026; https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2026-01/Final%20Order173.%20SouthCoast%20Wind%20SB-2022-02%201-22-26%20w-seal.pdf

[29] Rhode Island 2025 Climate Action Strategy (approved Dec. 18, 2025) at 32-33; Link: https://climatechange.ri.gov/media/2221/download?language=en

worms will be unavoidable but minimized to the greatest extent possible with recovery expected in a reasonable time frame.

The SouthCoast Wind project will temporarily impact these species during the installation of the submarine cable and excavation of the offshore HDD construction area. These construction-related disturbances to the seafloor will be along the cable corridor around the cable centerline by the burial methods used. The cable burial methods proposed by SouthCoast Wind are in line with industry's best practices and do not have alternatives with lesser impacts. It is expected that the disturbed sediments will become suspended in the water column before being redeposited on the seabed. The sediment deposition footprint resulting from the cable installation activities occurred relatively locally along the majority of the ECC route where the mass settles out quickly. The highest deposition thicknesses were contained primarily within a 20 m (65 ft) corridor around the ECC centerline. Deposition thicknesses of 1 mm (0.04 in) are generally limited to a corridor with a maximum width of 100-115 feet around the cable centerline.[30]

It is projected that the benthic communities will recolonize the area of post construction. Recolonization is expected to happen quickly from undisturbed neighboring areas along areas along the cable route. Species such are worms that are less impacted by seabed disturbance are expected to return within weeks to months. Other species are expected to return in another year depending on a variety of factors. It is expected that the whole[31]recover to preimpact levels in 1 to 3 years.[32]

Concerns during the public comment period were raised about the potential impacts of the heat generated by the cables on the benthic habitat. Inefficiencies inherent to energy transmission are expected to generate an inconsequential amount of heat to the benthic habitat. Measures such as burial depth help reduce the effects of cable heat from submarine cables. A BOEM 2024 review of expert state of the science literature concerning the potential impacts of offshore wind farms on marine organisms concluded that the "temperature increase is generally considered to be almost negligible in view of typical seasonal temperature variations. Therefore, similar to EMF exposure, it is not anticipated that enough individuals would be affected to result

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[30] *See* Hydrodynamic and Sediment Transport Modeling for the Brayton Point Export Cable Burial Assessment May 2024 Rev.B): pg. iv, Sections 4.7.1 (Mount Hope Bay and Sakonnet River Sediment Deposition) and 5 (Discussion and Conclusions), pp. 4-22 & 5-1.

[31] AKRF, Inc., AECOM, and A. Popper. 2012. Essential Fish Habitat Assessment for the Tappan Zee Hudson River Crossing Project.
Germano, J., J. Parker, and J. Charles. 1994. Monitoring cruise at the Massachusetts Bay Disposal Site, August 1990. DAMOS Contribution No. 92. U.S. Army Corps of Engineers, New England Division. Waltham, Massachusetts.
Hirsch, N.D., L.H. DiSalvo, and R. Peddicord. 1978. Effects of dredging and disposal on aquatic organisms. Technical Report DS-78-5. U.S. Army Engineer Waterways Experiment Station. Vicksburg, MS. NTIS No. AD A058 989.
Kenny, A.J. and H.L. Rees. 1994. The effects of marine gravel extraction on the macrobenthos: Early postdredging recolonization. Marine Pollution Bulletin 28: 442–447.

[32] *See* SCW Assent Application at 3-35 & 3-36.

in population level effects."[33] Within a few feet of the cable the temperature is expected to rise a degree Fahrenheit before dispersing into the water column.

4.3. Winter Flounder:

Winter flounder (*Pseudopleuronectes americanus*) lay their eggs over sandy bottoms and algal mats in shallow nearshore habitats during the winter and spring. These eggs are vulnerable to burial by displaced sediment. With the cable being buried in the center of the channel, most of the suspended sediment dropping out of the water column quickly and the consistent changing of the construction location, impacts to the eggs are minimal. Winter flounder are also expected to avoid the area during construction due to the noise generated. They are expected to return shortly after the construction has finished. The CRMC does not anticipate impacts to the winter flounder population from the project based on the anticipated construction schedule.

4.4. Crabs:

See EMF Section

4.5. Lobsters:

See EMF Section

4.6. Winter Skate:

Winter Skate (*Leucoraja ocellata)* lay their eggs year-round. Skate feed on a diverse range of organisms such as crustaceans, mollusks, worms, squid, and fish. Sediment disturbances created by the SouthCoast Wind project could impact the skate's ability to hunt. However, given the entirety of the Winter Skate habitat with similar access to resources and egg laying area, CRMC does not anticipate there to be an impact on the population.

4.7. Marine mammals (Whales, porpoises, seals, and sea turtles):

Within state waters are home to several species of marine mammals, the most common being seals (Harbor Seals). Sighting of whales (Humpback whale, North Atlantic right whale), porpoises (Harbor porpoise), sea turtles (Leatherbeck and Loggerhead) and dolphin (Common bottlenose dolphin) do occur within Rhode Island waters but are uncommon or rare.

The majority of the project's disturbance will be occurring within the Sakonnet River, Mount Hope Bay, and near shore at the cable landing location. These disturbances will include seafloor disturbances which could affect the benthic habitat and reduce the prey species for these marine mammals.

These impacts are expected to be temporary and localized to the area of the cable corridor. It is believed that these species and their prey will try to avoid the area during

[33] BOEM White Paper 2024-055, *Electromagnetic Fields: Background and Potential Impacts of Offshore Wind Farms on Marine Organisms* (August 2024), pg. 68. Link: https://www.boem.gov/sites/default/files/documents/environment/environmental-assessment/BOEM_2024-055_WP.pdf

construction but will return once construction has finished. Effects on diet and habitat preferences will be mitigated during construction by the relatively small percentage of habitat affected and the availability of similar habitat in the surrounding area.

The chance of vessel strike, and entanglement will be mitigated by environmental monitoring, reporting, and vessel strike avoidance measures required during in-water activities as outlined in SouthCoast Wind's COP Appendix O Marine Mammal and Sea Turtle Monitoring and Mitigation Plan. Given these strike avoidance measures and the low probability of marine mammal occurrence (with the possible exception of seals) in the Sakonnet River and Mount Hope Bay, risk of potential vessel strikes is low in Rhode Island waters.[34]

4.8. Birds (coastal, migratory, and marine bird species):

Roseate Tern (*dougallii dougallii)*

SouthCoast reached out to U.S. Fish and Wildlife Service, Information for Planning and Consultation (IPaC) and received on March 30th, 2022, a list of threatened, endangered, proposed and candidate species as well as any designated critical habitats. The IPaC-generated list indicated that the federally endangered Roseate Tern (*Sterna dougallii dougallii*) has the potential to occur within the project area. The IPaC list also indicated that "No critical habitat has been designated for this species" within the scope of the project area.[35]

The Roseate Tern is currently believed to have no nesting pairs in Rhode Island with the last pair recorded in 1984. Their nesting grounds are along sandy shore and barrier islands, and this is a similar area to the landing sites. However, because of the limited scope and duration of activity and very low expected presence, Staff believed this project will have minimum potential impacts.

In general, sediment and onshore habitat disturbances from construction and decommissioning have the potential to impact benthic and shellfish species, which are food sources for bird species. Impacts on diet and habitat preferences will be minimal and temporary, due to the availability of similar habitats nearby. The onshore Project activities are not likely to affect the Roseate Tern due to the minimal anticipated shoreline disturbance from the HDD installation of the export cable landfall.

4.9. Bats (Northen Long-eared Bat):

SouthCoast reached out to U.S. Fish and Wildlife Service, Information for Planning and Consultation (IPaC) and received on March 30th, 2022, a list of threatened, endangered, proposed and candidate species as well as any designated critical habitats. On the list was the Northern Long-eared Bat (*Myotis septentrionalis*) identified as a threatened species. The IPaC list also indicated "No critical habitat has been designated for this species" within the scope of the project area.

[34] S*ee* Assent Application at 3-59 & 3-60.
[35] *See* Assent Application at 3-82.

SouthCoast contacted RI DEM for information in 2022 on Northen Long-eared Bat. The information received indicated that no maternity roosts or hibernaculum are known within the project area. SouthCoast completed a Bat Risk Assessment in 2022 which anticipated "only low or very low effects to bats." All potential impacts within the State of Rhode Island are minimized given that the bats' known habitat is located primarily in trees and the onshore cable will be installed underground primarily within roadways. Staff is in agreement with this conclusion.

4.10. Insects (Monarch Butterfly):

SouthCoast reached out to U.S. Fish and Wildlife Service, Information for Planning and Consultation (IPaC) and received on March 30th, 2022, a list of threatened, endangered, proposed and candidate species as well as any designated critical habitats. On the list was the Monarch Butterfly (*Danaus plexippus)* identified as a candidate species. IPaC also indicated "No critical habitat has been designated for this species" within the scope of the project area.

Monarch Butterfly is a migrating species that is expected in Rhode Island between late summer and early fall which is outside the estimated timeline of this project. Staff believe this project will have a minimum potential impact.

5. Mitigation

Per 650-RICR-20-05-11.10.1(F), "The Council shall require that the potential adverse impacts of offshore developments and other uses on commercial or recreational fisheries be evaluated, considered and mitigated." Furthermore, "mitigation is defined as a process to make whole those fisheries user groups, including related shore-side seafood processing facilities, that are adversely affected by offshore development proposals or projects." As required by the Ocean SAMP § 11.10.1(G), negotiations between CRMC staff, the FAB, and SouthCoast Wind took place over the course of several months and resulted in the documented titled "SouthCoast Wind Fisheries Mitigation Proposal for the Category B Assent" located in Appendix B.

As such, should the Council approve the good faith negotiated fisheries compensatory mitigation proposal, the final executed agreement will be "included in the CRMC's Assent for the project."[36]

6. Staff Recommended Stipulations:

1. **Cable Burial Work Plan:** The applicant shall submit a Cable Burial Work Plan for review and approval by the CRMC Council at least 90 days prior to the start of construction. The Work Plan shall include all elements of the trenching and dredging work in areas within CRMC's regulatory authority. The work plan shall outline where

[36] *See* 650-RICR020-05-11.10.1(G).

and when each of the burial methods listed in Stipulation 3 will be utilized, and include weather and equipment contingency plans, a detailed list of all equipment and vessels to be utilized, and a detailed anchoring and spud plan. The Work Plan shall describe cable joint post burial methods, and those methods shall be restricted to those described below.

2. **Construction Schedule and Time of Year Restrictions:** At the request of the RIDEM, the Cable Burial Work Plan shall require a more detailed construction schedule via-a-vis fishery time-of-year restrictions. In the event that the project construction schedule changes, the applicant will be required to provide both CRMC and RIDEM with an updated schedule, for approval, prior to any changes being made. Construction sequence plans must be updated and provided to CRMC and RIDEM ninety (90) days prior to construction commencing.

3. **Dredge window**: The dredging activities described in the permit application propose the following cable installation methods: jetting sled/plow, jetting ROV, pre-cut plow, mechanical plow, mechanical cutting ROV system, or vertical injector. Use of these technologies may occur in state waters between October 15 and January 31. The applicant must adhere to all other restrictions and conditions in the Project's Section 401 Water Quality Certificate and Marine Dredge Permit issued by RIDEM ("401 WQC and Dredge Permit"). In the event dredging activities described in the permit application will exceed the above-mentioned time-of-year restriction, the applicant must receive written approval from CRMC and RIDEM staff prior to continuing such activities.

4. **Dredge Vessels:** All vessels that contain dredged material working in state waters are required to always have a Dredging Quality Management Program (DQM) on board and be operational.

5. **Dredge Pits for Horizontal Directional Drill (HDD)**: All material used during construction must be removed when completed. This includes but is not limited to rock bags or steel casing pipe. This excludes materials that are integral to the cable design, including the HDPE conduit that allows for cable pulling through the HDD and future cable maintenance or replacement. The applicant will be required to monitor and report to CRMC during construction the process of collecting drilling fluids. This process shall be approved by the Certified Verification Agent and included in the final CVA report

6. **Cable Burial Plan:** Prior to the submittal of the Cable Burial Work Plan, the cable installation contractor shall complete and provide to the CRMC and RIDEM the "Cable Burial Plan." This study shall include a detailed assessment of the anticipated sediment

conditions, unforeseen conditions, and the proposed cable installation method(s). This study shall be included and incorporated into the Cable Burial Work Plan.

7. **Construction Vessel Monitoring:** The applicant shall provide weekly construction schedule and work plan updates via SouthCoast Wind's Mariner Updates. Mariner Updates shall be sent weekly via email notification to subscribers of an established email notification list and will be posted simultaneously on SouthCoast Wind's "Mariner Updates" website. Mariner Updates will include anticipated locations of construction vessels, work areas, and the equipment they will be operating in Rhode Island State waters. The Mariner Updates shall advise mariners of work in a detailed 7-day outlook. If there is a significant change to the construction schedule and/or work plan after the 7-day outlook has been made, the applicant shall issue an update via the USCG Broadcast Notice to Mariners (BNM) and SouthCoast Wind's Mariner Updates email list serve and webpage. This information will allow mariners adequate notice to remove any fishing gear that may be in the work area.

   The applicant shall also notify the USCG of cable-laying activity for publication in its weekly First District Local Notice to Mariners. All construction vessels shall have an Automatic Information System operational during all construction activities in state waters. SouthCoast Wind shall advise mariners of cable laying operations through twice-daily SECURITE VHF radio notifications and will also provide mariners on the water with construction vessel locations and work plan deviations in real time and maintain a listening watch on VHF 16/13. If there is a deviation from the posted Mariner Updates that will materially affect marine users, SouthCoast Wind will post a special Mariner Update and add an additional radio broadcast over VHF.

8. **Cable Burial Depth**: The project shall be required to reach a minimum cable burial depth of four (4) feet, with a target depth of four (4) to six (6) feet, or deeper along the entire length of the export cable in state waters. Burial depth shall be determined from the top of the cable below existing seabed. In cases where the minimum burial depth cannot be achieved due to cable and pipeline crossings, machine failures, or unforeseen adverse bottom conditions, SouthCoast Wind will be required to attain minimum burial depth where SouthCoast Wind confirms depth can be achieved through reburial using the one or more of the burial methods listed in Stipulation 3. Where SouthCoast Wind confirms one or more of the burial methods listed in Stipulation 3 will not achieve minimum burial depth, SouthCoast Wind will confirm the acceptable burial depth from the cable burial risk assessment approach (which assesses seabed conditions, seabed mobility, and the risk of interaction with external hazards such as commercial fishing gear and vessel anchors engineered zonally along the route). In cases where one or more of the burial methods listed in Stipulation 3 is unsuccessful in achieving burial depth or in the cases of

cable or pipeline crossings, secondary cable protection shall be used to minimize risk to the maximum extent practicable to the cables and risk to other water users, including hazards such as commercial fishing gear and vessel anchors.

9. **Secondary Cable Protection:** SouthCoast Wind shall limit secondary cable protection to the extent shown in their ratified plans, such as to areas where the cable presents a risk to marine users and/or the cable, at crossings with other submerged cables or utilities, or other areas in which cable burial is not possible (e.g., cable joints). Where possible any necessary secondary cable protection shall be constructed of biologically-friendly materials (i.e. that allow epifaunal colonization) that mimic as closely as possible the existing surrounding habitat and be trawlable.

10. **Cable Burial Tools:** The applicant is required to use the best tool from their list of available tools (as described in the application and supplemental information provided) to achieve a minimum cable burial depth of four (4) feet, with a target depth of four (4) to six (6) feet, or deeper, in accordance with the Cable Burial Work Plan. SouthCoast Wind expects to use jet assisted mechanical plow as the principle proposed method of burial on all segments of the export cable route in Rhode Island state waters. SouthCoast Wind shall simultaneously lay and bury cables in state waters unless ground conditions are inappropriate or technically unfeasible.

11. **Cable Burial during Construction**: SouthCoast Wind shall mitigate against the risk of not achieving target burial depth by using one or more of the following options, depending on tool choice:
    a. using the geometry of the plow relative to the seabed and where necessary adjusting the tool settings;
    b. tuning the plow jetting system to the soil types encountered along the route as necessary;
    c. remotely adjusting the depth of burial on the plow during operations as necessary;
    d. monitoring and managing tow forces, share depth and plow speeds in the event hard clays are encountered;
    e. performing continuous, real time trenching performance validation to ensure the tool is operating as per the contractor specification, ensuring the tooling performs optimally for the given burial requirements and the as-encountered ground conditions; and
    f. performing continuous, real time burial performance validation, understanding cable burial versus the given burial requirements and the as-encountered ground conditions.

12. **Boulder Relocation:** The applicant shall supply a boulder relocation plan that ensures sensitive benthic habitats are preserved to the extent possible and that when moved, boulders do not negatively impact essential fish habitat (EFH), where technically feasible. Boulders shall be relocated to areas with similar bottom types within the fifty (50) meter surveyed corridor, where technically practicable, and shall not be placed in areas with submerged aquatic vegetation (SAV), on mussel beds, or on complex hard bottom habitats. The boulder relocation plan must be approved by RIDEM prior to implementation. If RIDEM does not provide comments on the plan within 60 days of its submittal, then SouthCoast Wind may presume concurrence with the plan.

    Monitoring via video or still image is required (e.g., drop camera) of selected areas (i.e., sampling stations) along the export cable corridor where boulder movement is conducted. Boulder relocation and seabed disturbance monitoring will align with the methodology and sampling frequency described in the SouthCoast Wind Fisheries and Benthic Monitoring Plan.

    Sampling stations in Rhode Island State waters will be determined post construction and will align with the requirements of the 401 WQC and Dredge Permit issued by RIDEM. Targeted areas and sampling locations within these areas of interest will be identified in the boulder relocation plan and approved by RIDEM prior to implementation.

    Within thirty (30) days of completion of boulder relocation, the Applicant shall notify NOAA's Office of Coast Survey and the CRMC and RIDEM of all locations of relocated boulders.

13. **Environmental Compliance Monitor:** The applicant shall designate a third-party Environmental Compliance Monitor (ECM) for this project whose responsibilities shall include monitoring environmental compliance during all construction activities associated with the SouthCoast Wind Export Cable construction. Prior to the start of construction, the Applicant shall provide CRMC the name, phone number, email, and qualifications of the ECM assigned to the project.

14. **Cable Route Surveys:** Within ninety (90) days of completing the installation of the SouthCoast Wind Export Cable in state waters, the applicant shall submit a post-construction survey of the actual cable location and the proposed cable easement with State Plane Coordinate System and Lat/Long coordinates for the cable angle points, easement corners/angle points of all secondary cable protection (concrete mattress, rock berm, rock bags, fronded mattresses, etc.), and an ArcGIS shapefile of the installed cables to the CRMC and RIDEM. The lists of coordinates and the shapefile overlaid on a NOAA nautical chart shall also be made available to the CRMC and RIDEM, as well as the fishing industry no later than thirty (30) days after installation. All information shall

be provided promptly to NOAA's Office of Coast Survey. In the event the post-construction survey as described in this section exceeds the above-mentioned time frames, the applicant must apply for a variance subject to written approval from CRMC and RIDEM staff.

The entire cable route within state waters shall be surveyed using high-resolution geophysical (HRG) methods such as multi-beam bathymetry coincident with the submerged cable installation and placement of any secondary cable protection if necessary. The entire cable route within state waters will again be surveyed one (1) year later and then every three (3) years thereafter. The results of the six-month as-built, within one (1) year following the initial post-installation inspection, and every three (3) years thereafter cable surveys shall be provided to the CRMC review within ninety (90) days of survey completion and shall include any remedial actions taken or scheduled to occur.

The need for further surveys in the lifecycle of the project will be determined jointly by CRMC and SouthCoast Wind and planned based on the findings in the initial surveys listed above.

A survey will be required after any major storm event (as defined within the BSEE-approved post-storm monitoring plan). This survey shall be provided to the CRMC within ninety (90) days of survey completion and include any remedial actions taken or scheduled to occur.

If CRMC determines that the condition of the cable or conditions along the cable corridor warrant adjusting the frequency of inspections (e.g., due to changes in cable burial or seabed conditions that may impact cable stability or other users of the seabed), then CRMC may require SouthCoast Wind to submit a revised inspection schedule for review and concurrence.

In the event that cable monitoring shows an installed cable has been exposed, the cable presents a risk to other marine users, and/or is at risk of being damaged, the applicant shall immediately submit a corrective action plan to CRMC. Approval by CRMC shall be required before implementing any corrective action.

15. **Cable Inspection Program**: Bureau of Ocean Energy Management (BOEM) requires that a Certified Verification Agent (CVA) be involved at all stages of project development and construction. CRMC shall require that a CVA be involved during construction for cable burial and secondary cable protection. The CVA shall provide regular reports to CRMC and RIDEM during all phases of construction.

    The CVA shall provide a report to the CRMC within ninety (90) days of completion.

16. **Cable Inspection Long-term Monitoring Plan**: Within six months of project completion, the applicant shall submit a long-term monitoring and operations and maintenance plan for the transmission cables for CRMC review and approval by the Council. This plan shall include a post-construction inspection using a multibeam survey to ensure cable burial depth was achieved and to verify reconstitution of the trench.

17. **Exposed Cable:** In the event that cable inspection and/or monitoring shows an installed cable has become exposed, the cable presents a risk to other marine users, and/or is at risk of being damaged, the applicant or successive permit holder shall promptly submit a corrective action report and receive approval from the CRMC before implementing corrective measures in compliance with the CRMC permit and any order of the Council.

18. **Submerged Cable Fisheries Monitoring Plan:** The application for the submerged cable shall include the approved fisheries monitoring plan for state waters. The Fisheries Monitoring Plan was developed in consultation with RIDEM Division of Marine Fisheries for the appropriate inclusion of species, gear methods, and sampling protocols.

    SouthCoast Wind shall implement the fisheries monitoring plan to obtain the specified fisheries monitoring data for a minimum of two (2) years prior to cable installation, during construction in state waters, and for three (3) years following commencement of cable activation and operation.

    A monitoring plan to assess secondary cable protection habitat shall be provided to CRMC and RIDEM within sixty (60) days of completion of cable protection installation operations. This plan shall include visual monitoring (video or photography) and a means of recording observations of any coverage of invasive species. The schedule of monitoring habitats along the cable route please shall conform to the timeline for monitoring boulder movement operations. The monitoring plan and subsequent reports shall be provided to RIDEM, CRMC, and other resource agencies for review and comment.

19. **Fisheries Representative:** A third-party fisheries representative shall be funded by the assent holder and shall be reviewed and ratified by the Council before beginning construction. The fisheries representative shall be employed for the duration of construction of the offshore activities.

20. **Certified Verification Agent Installation Report:** A Certified Verification Agent (CVA) shall be involved during background measurements and annual monitoring. The CVA shall provide regular reports to CRMC during construction.

The CVA shall provide a post-installation report following project completion verifying that the submerged cable and landfall installations were completed in accordance with the CRMC ratified plans and specifications and any remedial actions pursuant to the CVA cable inspection program as may be required.

21. **Electromagnetic Fields Study Plan:** The applicant must adhere to Condition 24 in the project's 401 WQC and Dredge Permit issued by RIDEM, for assessing electromagnetic field levels (EMF) and burial depth along the cable routes to address the potential effects of EMF on the composition, life cycle functions, uses, process and activities of fish and wildlife. The RIDEM-required Cable Route Inspection and Post-Construction Monitoring Plan shall include a post-construction inspection to verify cable burial depth, trench reconstitution, and measure and assess EMF field levels along the cable route in state waters.

22. **EMF Monitoring**: Pursuant to Condition 24 in the project's 401 WQC and Dredge Permit issued by RIDEM, within ninety (90) days of the post-construction assessment (even if required by another agency), the results of the EMF survey will be provided to RIDEM and CRMC in a public report. If it is determined by RIDEM that there is an adverse impact to the composition, life cycle functions, uses, process and activities of fish and wildlife, the applicant's EMF expert shall submit a recommendation to address such impact to RIDEM for review, comment, and approval based on the best available science. All approved recommendations shall be implemented within a reasonable time period.

23. **Historic and Archaeological Preservation Memorandum:** A final Memorandum~~s~~ of Agreement (MOA) as part of the Section 106 of the National Historic Preservation Act (NHPA) was executed on December 18, 2024 by SouthCoast Wind and the RI Historical Preservation and Heritage Commission (RIHPHC), among other Section 106 Consulting Parties, to address/mitigate impacts on Historic properties and Archaeological Resources. CRMC defers to RIHPHC and the Tribes in their capacities as Consulting Parties under the Section 106 process. SouthCoast Wind will be bound by the terms of the MOA entered into as part of the Section 106 of the NHPA process, and as such, CRMC regulatory authority over paleolandscapes will be satisfied by that MOA under the Section 106 process.

24. **Landfall Cable Burial Depth:** For Horizontal Directional Drilling from offshore, the project shall be required to reach a minimum cable burial depth of 9 feet between mean high water and mean low water. A post-installation elevation survey shall be submitted to the CRMC to confirm this requirement has been followed. This survey shall be submitted within ninety (90) days of the completed installation at the landfall location.

25. **Cable Installation in the vicinity of Freshwater Wetlands:** Onshore cable installation in the vicinity of freshwater Wetlands is hereby allowed within the route defined in the application, provided the following conditions are met:
    a. Existing culverts and the flow of water under bridges in roads or highways are not blocked or disrupted by going under or attaching to such structure;
    b. The project does not cause any diversion of ground or surface water to or from any wetlands;
    c. The preconstruction contours are restored immediately upon installation;
    d. All disturbed areas are revegetated after restoring contours;
    e. The project design incorporates best management practices for dewatering from excavated areas; and
    f. All stormwater basins disturbed along the route will be restored to full function; Furthermore, as a condition of this permit there shall be no direct discharges of dewatering fluids to wetlands, catch basins, or stormwater conveyance systems that discharge to wetlands without proper treatment that effectively removes sediments and other visible contaminants.

26. **Prerequisite State and Federal Agency Approval Requirements:** The Bureau of Ocean Energy Management (BOEM) issued the Record of Decision (ROD) for the Project on December 20, 2024, and approved the Project's Construction and Operations Plan (COP) on January 17, 2025. Accordingly, SouthCoast Wind may engage in construction of any of the following on the condition that the Project has all other applicable permits, approvals and consultations for such work: the onshore transmission cable; and the onshore and offshore horizontal directional drilling at and by the landfall at Town of Portsmouth, Rhode Island. In the event that the Project does not receive a non-objection from BOEM of the relevant Final Design Report and Fabrication and Installation Report, the Project shall remove all relevant facilities constructed and restore the area to reasonably the same condition as it was prior to construction at the Projects' sole expense. After SouthCoast Wind has obtained all other applicable permits for the project, copies of these approvals shall be submitted to CRMC for File #2023-02-090.

27. **Research:** Following notice, the project's supporting structures in Rhode Island jurisdiction, including export cables shall be available for research projects ratified by the Executive Director that do not affect operation, maintenance, emergency access or warranties. Such availability shall be subject to participants agreeing to execute a release waiving all liability associated with such access and to any requirements of OSHA, ISPS, or other governmental agencies with jurisdiction and the project owner's site, insurance and HSE procedures and requirements and restrictions in place to protect persons and property.

28. **Submerged Lands Lease:** The Council shall require SouthCoast Wind, in accordance with Rhode Island General Law § 46-23-1(f)(2), to obtain a submerged lands lease authorization and requisite annual submerged lands lease fee by the direct enactment of the RI General Assembly prior to the start of any construction within state waters.

29. **Permit Expiration**: This permit shall expire thirty-five (35) years from the date of issuance. Any extension of this permit will require approval by CRMC.

30. **Decommissioning:** SouthCoast Wind's ROD and approved COP cover decommissioning activities of Project components in both federal and state waters. SouthCoast Wind will abide by the BOEM Lease stipulations and ROD and COP requirements for decommissioning. SouthCoast Wind will submit a Decommissioning Application to the Bureau of Safety and Environmental Enforcement (BSEE) and BOEM for review and approval as applicable before the end of the proposed Project's life. At that time, SouthCoast Wind will also submit to CRMC the portion of this Decommissioning Application pertaining to Rhode Island jurisdictional areas for review.

7. Submerged Lands Lease Recommendations

SouthCoast Wind Energy LLC has requested a Submerged Lands License for Renewable Energy Development that is larger than 25 acres in support of the Project's offshore power cables bundle. Requests for a submerged lands lease (SLL) 25 acres or larger "requires direct enactment of the general assembly by legislative action."[37] The SCW offshore power cables are not transatlantic cables as defined by the CRMC Management Procedures at 650-RICR-10-00-1.4.14[38] because the cables would extend from the project's lease area approximately 51 nautical miles southeast of the Rhode Island coast into Rhode Island state waters. The requested SLL area comprises two separate portions of Rhode Island's submerged lands. Portion one travels from the mean high-water (MHW) mark at Portsmouth, Rhode Island seaward in the Sakonnet River to the limit of the Rhode Island territorial waters; portion two travels from the MHW mark on the Mount Hope Bay side of Portsmouth to the R.I./Mass. state boundary in the Bay. The total length of the offshore export cable corridor is approximately 20.4 miles (32.8 km), will be a maximum of 2,300 feet (700 m) wide, and will result in a total lease area of 4,135 acres in Rhode Island state waters. The requested SLL would be sufficient for cable bundles associated with SCW Project 1 and Project 2. Project cables, when not bundled, will run parallel with a targeted

[37] *See* R.I. Gen. Laws § 46-23-1(f)(2).
[38] *See* 650-RICR-10-00-1.4.14(B)(4) defining a "transatlantic cable [as] one that spans or cross the Atlantic Ocean from Rhode Island to another country other than Canada or Mexico…"; *See also* R.I. Gen. Laws § 46-23-1(f)(2) specifically delegating authority to the CRMC to "develop, coordinate, and adopt a system for the leasing of submerged and filled lands…" and explicitly setting a maximum fee for transatlantic cables making landfall in Rhode Island.

spacing of 164 feet between cables. Consistent with Revolution Wind's SLL request, SouthCoast Wind has requested the entire corridor area as a requirement to support necessary operations and maintenance activities associated with the export cables.

The SLL request would entail granting SCW the rights to the installation, construction, reconstruction, repair, replacement, maintenance, operation, uses, inspection, patrol, decommissioning and removal of the export cables in accordance with relevant CRMC regulations. SCW will be limited only to those activities related to the export cable and may only conduct those activities in accordance with the assent, subject to stipulations and the relevant CRMC regulations. The lease will prevent additional submerged cables or burials of a similar nature from being within the lease zone unless otherwise approved of by legislative action.

Under Rhode Island General Laws § 46-23-1(f)(2) "The legislature hereby declares that, in light of the unique size, scope, and overall potential impact upon the environment of large-scale filling projects involving twenty-five (25) acres or more, any lease of tidal lands, or any license to use those lands, is subject to approval, disapproval, or conditional approval by the direct enactment of the general assembly by legislative action."

CRMC staff have determined that the SouthCoast Wind project meets the criteria established by R.I. Gen. Laws § 46-23-1(f)(2). As such, the sole authority to issue a SLL for the Project rests with the Legislature. Staff shall work for the general assembly in an advisory capacity and make recommendations on the request for a SLL. The required SLL will not prohibit the council from issuing a decision. A stipulation for requiring a SLL has been added to the report to address this issue.

8. Applicability of CRMC Regulations:

8.1. Coastal Resources Management Council Program, Red Book § 650-RICR-20-00-01:

8.1.1. General Applicability

In the case of this project, the RI Coastal Resources Management Program (RICRMP) applies to all project activities located beyond the jurisdictional boundaries of the Ocean Special Area Management Plan (OSAMP). This includes activities located on land, on coastal features, and in tidal waters out to the three-nautical mile state boundary. These include but are not limited to the landfall work areas, the two landing sites, and the two submarine export cables.

Pursuant to RICRMC § 1.1.4 (Alterations and Activities that Require an Assent from the Coastal Resources Management Program), all portions of the Project, including activities inland of the nominal 200 foot jurisdictional area, are subject to be included in within CRMC's coastal jurisdiction when "…any alteration or activity, any portion of which extends onto the most inland shoreline feature or its two hundred (200) foot contiguous area…" Furthermore, the Ocean Special Area Management Plan requires that, "All construction activities shall comply with the polices and standards outlined in the Rhode Island Coastal Resources Management

Program (a.k.a., the "Red Book") as well as the regulations of other relevant state and federal agencies."

8.1.2. Requested Variances: No variances are requested for the Project.

8.1.3. Special Exceptions: No special exceptions are requested for the Project.

9. Rules and Regulations Governing the Protection and Management of Freshwater Wetlands in the Vicinity of the Coast § 650-RICR-20-00-2:

9.1. Water Quality Regulatory Standards:

Freshwater Wetlands Regulation Citation	Regulation Standard	CRMC Response
9.7.2(A) The following review criteria will be used by the CRMC to determine the impacts of all projects and activities, either individually or cumulatively, upon the functions or values of freshwater wetlands, buffers, floodplains, areas subject to flooding and areas subject to storm flowage. All such projects and activities shall be subject to all of the review criteria contained within this Part and must incorporate those best management practices, best available technologies, and any maintenance or inspection schedules necessary to comply with the applicable criteria.		
9.7.2(A)(3)	No project or activity shall result in any random, unnecessary or undesirable alteration of a freshwater wetland, buffer, floodplain, area subject to flooding or area subject to storm flowage.	This project is determined to have a necessary purpose and need.
9.7.2(B) Before issuing a permit, the CRMC must determine that a proposed project or alteration will not result in:		
9.7.2(B)(1)	Significant reduction in the overall wildlife production or diversity of a freshwater wetland or buffer;	All impacts on the freshwater wetland are expected to be both temporary and in the direct area of the onshore construction activities. Overall, this project will not have significant impacts on wildlife production or diversity.
9.7.2(B)(2)	Significant reduction in the ability of a freshwater wetland or buffer to satisfy the needs of a particular wildlife species;	Most construction activities will be within existing developed transportation corridors. All parts of the route are expected to return to a habitable state within a short time frame after the project is complete.
9.7.2(B)(3)	Significant displacement or extirpation of any wildlife species from a freshwater	There will be displacement or/and extirpation of the local wildlife in the immediate vicinity of the onshore

	wetland or surrounding areas due to the alteration of the freshwater wetland or buffer;	construction efforts. These impacts are expected to be temporary. Therefore, staff believe that this project will not have significant impacts on wildlife production or diversity.
9.7.2(B)(4)	Any reduction in the ability of the freshwater wetland or buffer to ensure the long-term viability of any rare animal or rare plant species;	Staff do not believe there will be any reduction of the long-term viability of any rare animal or rare plant species as none were identified in the project area.
9.7.2(B)(5)	Any degradation in the natural characteristic(s) of any rare freshwater wetland type;	The onshore construction activities are not located in or should encroach upon any rare freshwater wetlands. This project has also implemented soil erosion and sediment control measures that will help protect the freshwater wetlands.
9.7.2(B)(6)	Significant reduction in the suitability of any freshwater wetland or buffer for use by any resident, migratory, seasonal, transient, facultative, or obligate wildlife species, in either the short or long-term as a travel corridor; feeding site; resting site; nesting site; escape cover; seasonal breeding or spawning area;	Any impacts are expected to be temporary and localized to the area directly impacted by construction, with full recovery expected. These short-term impacts are not expected to have any significant reduction due to the availability of similar habitats nearby.
9.7.2(B)(7)	Any more than a minimal intrusion of, or increase in, less valuable, invasive or exotic plant or animal species in a freshwater wetland or buffer;	SouthCoast will undertake efforts to identify non-native, invasive plants species along the project route and implement proper soil handling and stockpiling to avoid cross-contamination of soil materials that may contain these non-native plants. This includes inspecting and thoroughly cleaning vehicles, equipment, and construction mats to remove excess soil.
9.7.2(B)(8)	Significant reduction in the wildlife habitat functions and values of any freshwater wetland or buffer which could disrupt the management program for any game or non-game wildlife species carried out	There will be displacement or/and extirpation of the local wildlife in the immediate vicinity of the onshore construction efforts. These impacts are expected to be temporary. Therefore, staff believe that this project will not significantly disrupt the management program for any game or non-game wildlife species carried

	by State or Federal fish, game, or wildlife agencies;	out by State or Federal fish, game, or wildlife agencies
9.7.2(B)(9)	Significant reduction in overall current or potential ability of a freshwater wetland or buffer to provide active or passive recreational activities to the public;	Due to the limited scope and temporary nature of the onshore construction activities and the construction window being in the offseason, staff don't expect any significant reduction in overall current or potential ability of a freshwater wetland or buffer to provide active or passive recreational activities to the public.
9.7.2(B)(10)	Significant disruption of any on-going scientific studies or observations performed by or in cooperation with Federal, State, or municipal agencies or educational institutions;	There are currently no known ongoing scientific studies or observations happening near any of the onshore project work areas.
9.7.2(B)(11)	Elimination of, or severe limitation to traditional human access to, along the bank of, up or down, or through any rivers, streams, ponds, or other freshwater wetlands or buffers;	There will be no elimination of, or severe limitation to, any traditional access to the area.
9.7.2(B)(12)	Any reduction in water quality functions and values or negative impacts to natural water quality characteristics, either in the short or long-term, by modifying or changing: water elevations, temperature regimes, volumes, velocity of flow regimes of water; increasing turbidity; decreasing oxygen; causing any form of pollution; or modifying the amount of nutrients so as to negatively impact freshwater wetland functions and values;	SouthCoast Wind has submitted a site-specific Soil Erosion and Sediment Control (SESC) Plan that follows regulatory guidance of the Rhode Island Soil Erosion and Sediment Control Handbook and the Rhode Island Stormwater Management, Design, and Installation Rules. Staff recommends these measures as they will mitigate any impact on water quality and peak discharge rates. SouthCoast has also applied for and received a Rhode Island Pollutant Discharge Elimination System General Permit for Stormwater Discharge Associated with Construction Activity. Staff does not expect any reduction in water quality functions.
9.7.2(B)(13)	Any placement of any matter or material beneath surface water elevations or	Not applicable, as no work is proposed within the freshwater wetlands.

	erection of any barriers within any ponds or flowing bodies of water which could cause any hazards to safety;	
9.7.2(B)(14)	Significant loss of important open space or significant modification of any uncommon geologic features or archaeological sites that are listed on the National Register of Historic Places or eligible for listing;	SouthCoast Wind has performed surveys to identify any buried archaeological sites in the proposed construction areas and filed a Terrestrial Archaeological Resources Assessment (Phase 1A/1B Report). SouthCoast Wind will continue to investigate in consultation with RIHPHC and Native American Tribes. CRMC will defer to RIHPHC and Native American Tribes in their capacities as consulting parties in the federal Section 106 process. .
9.7.2(B)(15)	Significant modification to the natural characteristics of any freshwater wetland or buffer area of unusually high visual quality;	There is no significant modification to the natural characteristics of any freshwater wetland or buffer area of unusually high visual quality expected because there are no above-ground structures proposed. All cables will be buried and remain so for the duration of the project.
9.7.2(B)(16)	Any decrease in the flood storage capacity of any floodplain or area subject to flooding which could impair its ability to protect life or property from flooding or flood flows;	The underground cables proposed for this project will not cause a decrease in flood storage capacity of any floodplain or area subject to flooding which could impair its ability to protect life or property from flooding or flood flows.
9.7.2(B)(17)	Significant reduction of the rate at which flood water is stored by any floodplain or area subject to flooding during any flood event;	The underground cables proposed for this project will not cause significant reduction of the rate at which flood water is stored by any floodplain or area subject to flooding during any flood event.
9.7.2(B)(18)	Restriction or significant modification of the path or velocities of flood flows for the one (1) year, ten (10) year, or one hundred (100) year frequency, twenty-four (24) hour, Type III storm events so as to cause harm to life, property, or other functions and values provided by freshwater	The underground cables proposed for this project will not cause restriction or significant modification of the path or velocities of flood flows for the one (1) year, ten (10) year, or one hundred (100) year frequency, twenty-four (24) hour, Type III storm events so as to cause harm to life, property, or other functions and values provided by freshwater wetlands, buffers or floodplain.

	wetlands, buffers or floodplain;	
9.7.2(B)(19)	Placement of any structure or obstruction within a floodway so as to cause harm to life, property, or other functions and values provided by freshwater wetlands or their associated buffers;	The only structure proposed are underground cables that will not cause any obstruction.
9.7.2(B)(20)	Any increase in run-off rates over pre-project levels or any increase in peak flood elevations within freshwater wetlands, buffers, floodplains, areas subject to flooding or areas subject to storm flowage for the one (1) year, ten (10) year, or one hundred (100) year frequency, twenty-four (24) hour, Type III storm events which could impair their ability to protect life or property from flooding or flood flows;	The underground cables proposed for this project will not cause any increase in run-off rates over pre-project levels or any increase in peak flood elevations.
9.7.2(B)(21)	Any increase in run-off volumes and discharge rates which could, in any way, exacerbate flooding conditions in flood-prone areas;	The underground cables proposed for this project will not cause any increase in run-off volumes and discharge rates which could, in any way, exacerbate flooding conditions in flood-prone areas.
9.7.2(B)(22)	Significant changes in the quantities and flow rates of surface or groundwater to or from isolated freshwater wetlands (e.g., those freshwater wetlands without inflow or outflow channels);	There are no aspects of the proposed onshore activities that should cause significant changes in the quantities and flow rates of surface or groundwater to or from isolated freshwater wetlands.
9.7.2(B)(23)	Placement of any structural stormwater best management practices within freshwater wetlands, or proposal to utilize freshwater wetlands as a	While the proposed onshore construction activities will implement soil erosion and sediment control measures, these measures will be outside the edges of the freshwater wetlands where feasible. SouthCoast will not use freshwater wetlands or waters for

	stormwater best management practice;	stormwater management during construction.
9.7.2(B)(24)	Any more than a short-term decrease in surface water or groundwater elevations within any freshwater wetland;	Staff does not expect any impacts beyond the short-term during construction.
9.7.2(B)(25)	Non-compliance with the DEM's Water Quality Regulations, 250-RICR- 150-05-1; or	SouthCoast Wind is in compliance with DEM's Water Quality Regulations through their Section 401 Water Quality Certification and Dredge Permit issued on March 14, 2024.
9.7.2(B)(26)	Any detrimental modification of the ability of a freshwater wetland or buffer to retain or remove nutrients or act as a natural pollution filter.	Staff does not expect the proposed onshore activities to have any detrimental effect on the ability of a freshwater wetland or buffer to retain or remove nutrients or act as a natural pollution filter.
9.7.3(B)(2) All reasonable alternatives to avoid and minimize impacts to freshwater wetlands, buffers, floodplains, areas subject to flooding and areas subject to storm flowage have been pursued and incorporated into the project design and application as follows		
9.7.3(B)(2)(a) Avoidance: All persons must satisfactorily demonstrate to the CRMC in the form of a written narrative that all probable impacts to freshwater wetlands functions and values have been avoided to the maximum extent possible. The written narrative must describe what steps were taken to avoid impacts to freshwater wetlands. At a minimum, applicants must consider and address the following issues:		
9.7.3(B)(2)(a)(1)	Whether the primary proposed activity is water-dependent, or whether it requires access to freshwater wetlands as a central element of its primary purpose (e.g., a pier);	The SouthCoast Wind project ties into a larger effort that is water dependent. This is an offshore wind project using a federal land lease area to generate power. SouthCoast has reviewed several different routes to deliver the power and requires a route up the Sakonnet River overland in the Town of Portsmouth and into Mount Hope Bay.

9.7.3(B)(2)(a)(2)	Whether any areas within the same property or other properties owned or controlled by the applicant could be used to achieve the project purpose without altering the natural character of any freshwater wetlands;	SouthCoast Wind's onshore cable route uses already disturbed areas including state and town public roadways, a Right of Way roadway, and private land. The cable will still need to cross areas that are located within the 200 ft contiguous area to coastal wetlands, 100 ft contiguous area to freshwater wetlands, and 200 ft contiguous area to river/stream. There is no practical way to avoid crossing this area and with proper burial of the cables all impacts are expected to be temporary and will not alter the natural character of any freshwater wetlands.
9.7.3(B)(2)(a)(3)	Whether any other properties reasonably available to, but not currently owned or controlled by, the applicant could be used to achieve the project purpose while avoiding wetland alterations. A property is reasonably available if, in whole or in part, it can be acquired without excessive cost, taking individual circumstances into account, or, in the case of property owned or controlled by the same family, entity, group of affiliated entities, or local, state or federal government, may be obtained without excessive hardship;	The project is an offshore wind farm that must make cable landfall somewhere near the shore. In the proposed landing location the cable crosses about two miles of land before re-entering the water to make land fall in Massachusetts. The bridge height prevents the cable from being laid completely along the Sakonnet. Fourteen onshore and offshore export cable route combinations to connect to the electric grid at Brayton Point in MA were considered by SouthCoast Wind for environmental, economic and/or operational reasons. *See* Assent Application, Attachment B – Route Alternatives Assessment, which staff reviewed and determined that this route meets the standards for this regulation.

9.7.3(B)(2)(a)(4)	Whether alternative designs, layouts or technologies could be used to avoid freshwater wetlands or impacts on functions and values on the subject property or whether the project purpose could be achieved on other property that is reasonably available and would avoid wetlands;	Given the nature of this project there are no reasonable alternative designs, layouts or technologies that could be used. Staff review determined that the project meets the standards for this regulation.
9.7.3(B)(2)(a)(5)	Whether the applicant has made any attempts (and if so what they were) to avoid alterations to freshwater wetlands by overcoming or removing constraints imposed by zoning, infrastructure, parcel size or the like; and	The applicant has worked extensively with the Town of Portsmouth to find the least impactful route. Staff review determined that this route meets the standards for this regulation.
9.7.3(B)(2)(a)(6)	Whether feasible alternatives that would not alter the natural character of any freshwater wetlands on the subject property or on property that is reasonably available, if incorporated into the proposed project, would adversely affect public health, safety or the environment.	Staff review determined that there are no feasible alternative routes. Therefore, this cable route meets the standards for this regulation.
9.7.3(B)(2)(b)	Minimization: For any impact to freshwater wetlands that cannot be avoided, the applicant must satisfactorily demonstrate to the CRMC in the written narrative that the impact to wetland functions and values have been reduced to the maximum extent possible. At a minimum, applicants must consider and address the following issues:	The proposed route utilizes previously disturbed land (e.g., existing roadways and rights of way) and avoids impact on the wetlands to the maximum extent possible. Staff review determined that this cable route meets the standards for this regulation.

9.7.3(B)(2)(b)(1)	Whether the proposed project is necessary at the proposed scale or whether the scale of the wetland alteration could be reduced and still achieve the project purpose;	The project is expected to provide approximately 1,200 MW of power (with a planned additional 1,200 MW from Project 2), and the cable and landfall underground conduit are sized to fit this need. Staff review determined that this cable route meets the standards for this regulation.
9.7.3(B)(2)(b)(2)	Whether the proposed project is necessary at the proposed location or whether another location within the site could achieve the project purpose while resulting in less impact to the wetland;	Staff review determined that there are no feasible alternative routes. Therefore, this cable route meets the standards for this regulation.
9.7.3(B)(2)(b)(3)	Whether there are feasible alternative designs, layouts, densities or technologies, that would result in less impact to the wetland while still achieving the project purpose; and	Staff review determined that there are no feasible alternative routes. Therefore, this cable route meets the standards for this regulation.
9.7.3(B)(2)(b)(4)	Whether reduction in the scale or relocation scale of the proposed project to minimize impact to the wetland would result in adverse consequences to public health, safety or the environment.	Staff do not see any reduction in the scale or relocation of this project as reasonable alternatives. Other possible locations are expected to have higher adverse consequences for public health, safety, or the environment.

9.2. CRMC regulatory standards:

The table below covers a collection of CRMC regulatory standards that have been applied to the project. The table is sorted left to right by the regulation citation, an excerpt of the regulation text, and followed by the staff response to the regulation.

Regulation Number	Regulation Text	CRMC Responses
1.1.5	Review Categories and Prohibited Activities in Tidal Waters and on Adjacent Shoreline Features	SouthCoast Wind's application covers the appropriate activities classified as "Energy-related Activities/Structures," "Dredging-Improvement" and "Filling in Tidal Waters"

		in Tidal Waters designated as Types 2 and 4 require a Category B Assent Application.
1.1.6(F)(1)	Applicants for activities and alterations listed as "B" in Tables 1, 2, or 3 in § 1.1.5 of this Part, in addition to adhering to the applicable policies, prerequisites, and standards, are required to address all Category B requirements as listed in applicable sections of the program and, where appropriate, other issues identified by the Council.	SouthCoast Wind has responded to all relevant regulations in the review criteria to demonstrate conformance.
1.1.6(F)(2)	Formal notice will be provided to all interested parties once completed forms for a Category B application have been filed with the Council. The notice shall set forth the nature of the application, any variances requested and the applicable sections of the CRMP from which a variance is requested. A public hearing will be scheduled if there are one or more substantive objections to the project, or at the consensus of four or more members of the Council.	A public notice was issued for this applicant on November 13, 2024, for a 68-day comment period concluding on January 20, 2025.
1.1.6(F)(3)	A Category B Assent shall be issued if the Council finds that the proposed alteration conforms to the goals, policies, prerequisites, informational requirements, and standards of this Program.	SouthCoast Wind has responded to all relevant regulations in the review criteria to demonstrate conformance.
1.1.6(I)	**1.1.6(I)(1).** The following new projects when subject to the jurisdiction of the CRMC must file a coastal hazard analysis with their CRMC	SouthCoast Wind completed a Coastal Hazard Analysis for the onshore portion of the project in the Town of Portsmouth. The analysis used a 33-year window and a projected sea level rise of 5 feet.

	application using the "CRMC Coastal Hazard Application Guidance" provided in Chapter 5 of the CRMC Shoreline Change Special Area Management Plan (Beach SAMP): **1.1.6(I)(1)(b)**. construction of new commercial and industrial structures as defined in § 1.1.2 of this Part; **1.1.6(I)(1)(e)**. construction of any new infrastructure project subject to §§ 1.3.1(F), (H), and (M) of this Part;	The analysis indicates that part of the transition joint bay (TJB) at the northeast landfall area and approximately 900 ft of the onshore underground export cables along Boyds Lane from the HDD work area may be affected by the projected changes in sea level rise. Since buried transmission lines are designed to be resilient to water inundation, a 5.0-ft rise in sea levels is not expected to negatively impact the onshore Project components and TJB hardware and cable supports.
1.1.6(I)(3)	**1.1.6(I)(3)** All projects meeting the analysis thresholds established in §§ 1.1.6(I)(1) and (2) of this Part above shall complete the CRMC coastal hazard application worksheet (http://www.crmc.ri.gov/coastalhazardapp.html) and provide the following information as part of the application: ... **1.1.6(I)(4)** All projects meeting the analysis thresholds established in §§ 1.1.6(I)(1) and (2) of this Part above shall provide site plans of the proposed project with the following overlays: ... **1.1.6(I)(5)** All projects meeting the analysis thresholds	SouthCoast provided a completed CRMC coastal hazard application worksheet (Attachment Q to Assent Application). Staff has reviewed the information and has determined that it meets these regulations.

	established in §§ 1.1.6(I)(1) and (2) of this Part above shall describe the proposed coastal adaptation techniques incorporated into the project design to overcome or accommodate any coastal hazard exposure risks resulting from the analyses required by § 1.1.6(I) of this Part.	
1.1.10	Climate Changes and Sea Level Rise	At its proposed landfall areas, the export cables will be installed by HDD. With this method the export cables will be buried at depths of up to approximately 40 ft (12.2 m) below the seabed, only surfacing at the designated HDD entry and exit pit locations. The entire onshore transmission line including the landfall location is designed to be submerged fully. Since buried transmission lines and the transition joint bay are designed to be resilient to water inundation, negative impacts from sea level rise are not expected for this project.
1.1.11	Coastal Buffer Zones	SouthCoast has fulfilled this requirement
1.2.1	Tidal and Coastal Ponds	The export cable is considered by CRMC to be a water dependent activity. Most of the export cable will be in Type 4 waters with only a small portion of the Mount Hope Bay main shipping channel and the Tiverton shipping channel northeast of Portsmouth in Mount Hope Bay located within Type 6 waters. The export cable is not proposed in a coastal pond.
1.2.2(A)(1)(a) The Council's goals are:	**(1)** to preserve the qualities of, and public access to those beaches which are an important recreational resource (adjacent to Type 1 and 2 waters);	The Boyds Lane landing location is adjacent to Island Park Beach. While there is no construction happening within the Island Park Beach itself, there may be disruptions during the staging and installation of the cable. This is expected to be temporarily limited to the duration of the installation process. SouthCoast will develop a construction schedule that will avoid major

		events. Once construction begins, SouthCoast Wind will also have a construction webpage available to the public and will maintain an updated construction schedule and alert abutters, residents, and other stakeholders of construction locations, dates, activities, and traffic control measures.
	(2) to prevent activities that will significantly disrupt longshore and/or onshore offshore beach processes, thereby creating an erosion or flooding hazard; and,	By using Horizontal Directional Drilling (HDD) the cable installation will start offshore and emerge on land, therefore avoiding disruption to the longshore and onshore offshore beach processes.
	(3) to prevent construction in high hazard areas; and	The onshore cables are completely underground and will not be affected by these hazard areas.
	(4) to protect scenic and ecologic value of beaches	All Project infrastructure near Island Park Beach (i.e., the ECC, TJBs, and onshore export cables) will be installed below-ground and, thus, will not affect the scenic value of the beach. Also, no work is proposed at Island Park Beach and, thus, the ecological value of the beach will not be affected. More details are located in application section 4-10. During construction activities access may be temporarily disrupted, but this is expected to be limited to the duration of the installation process.
1.2.2(A)(1)(b)	Alterations to beaches adjacent to Type 1 and Type 2 waters are prohibited except where the primary purpose of the project is to preserve or enhance the area as a natural habitat for native plants and wildlife. In no case shall structural shoreline protection facilities be used to preserve or enhance these areas as a natural habitat or to protect the shoreline feature.	By using HDD the cable installation will start offshore and emerge on land, therefore avoiding alteration to the beaches.

1.2.2(A)(1)(c)	Alterations to beaches adjacent to Type 3, 4, 5, and 6 ...	By using HDD the cable installation will start offshore and emerge on land, therefore avoiding alteration to the beaches.
1.2.2(C)	Coastal Wetlands	By using HDD the cable installation will start offshore and emerge on land, therefore avoiding alteration to coastal wetlands. All construction onshore near the identified wetlands will be within the existing roadway. SouthCoast has also applied for and received a Rhode Island Pollutant Discharge Elimination System (RIPDES) Construction General Permit.
1.2.2(F)	Manmade Shorelines	By using HDD the cable installation will start offshore and emerge on land, therefore avoiding alteration of the existing seawall.
1.2.3	Areas of Historic and Archaeological Significance	A final Memorandum~~s~~ of Agreement (MOA) as part of the Section 106 of the National Historic Preservation Act (NHPA) was executed on December 18, 2024 by SouthCoast Wind and the RI Historical Preservation and Heritage Commission (RIHPHC), among other Section 106 Consulting Parties, to address/mitigate impacts on Historic properties and Archaeological Resources. CRMC defers to RIHPHC and the Tribes in their capacities as Consulting Parties under the Section 106 process. SouthCoast Wind will be bound by the terms of the MOA entered into as part of the Section 106 of the NHPA process, and as such, CRMC regulatory authority over paleolandscapes will be satisfied by that MOA under the Section 106 process. This requirement is also addressed in stipulation 23 of this report.

1.3.1(B) Filling, Removing, or Grading of Shoreline Features	**(1)(b)** All filling, removing or grading activities shall be done in accordance with the policies and standards of this section and the standards and specifications set forth in the most recent edition of the Rhode Island Soil Erosion and Sediment Control Handbook.	By using HDD for the cable installation, there will not be any filling, removing or grading of shoreline features.
	(1)(c) All new activities subject to §§ 1.3.1(C) (residential, commercial, and industrial structures), 1.3.1(M) and 1.3.3 of this Part, or those activities which disturb more than five thousand (5,000) square feet of land on a site shall prepare and implement an erosion and sediment control plan approved by the Council ... (omitted) **(1)(d)** The Council recognizes the most recent version of the Rhode Island Soil Erosion and Sediment Control Handbook, ... (omitted)	SouthCoast has submitted a suitable Soil Erosion and Sediment Control Plan that follows the most recent version of the Rhode Island Soil Erosion and Sediment Control Handbook and addresses these requirements.
	(3)(a)(1) Fill slopes shall have a maximum grade of thirty percent (30%);	Excavations associated with the landfall work areas and the onshore export cables are temporary and will be backfilled and restored to pre-existing grades. More details are located in application section 4-15.
	(3)(a)(2) All excess excavated materials, excess fill, excess construction materials, and debris shall be removed from the site and shall not be disposed in tidal	SouthCoast will collect all excess fill, construction material and debris. Where appropriate, these will be sorted for recycling or disposal.

	waters or on a coastal feature;	
	(3)(a)(3) Disturbed uplands adjacent to a construction site shall be graded and re-vegetated or otherwise stabilized to prevent erosion during or immediately after construction. Nutrients shall be applied at rates necessary to establish and maintain vegetation without causing significant nutrient runoff to surface waters;	SouthCoast will follow the RIPDES Construction General Permit and Project-specific SESC Plan and carry out stabilization of disturbed soil and revegetation where needed.
1.3.1(C)	Residential, Commercial, Industrial, and Recreational Structures	The applicant has acknowledged the policies and has completed the prerequisites.
1.3.1(F)	Treatment of Sewage and Stormwater	This project doesn't propose any new above ground structures and therefore it is exempt from the Stormwater Management Design and Installation Rules and the requirement to submit a Stormwater Management Design. More details are located in application section 4-22.
1.3.1(H)	Energy-Related Activities and Structures	SouthCoast has demonstrated compliance with regulation 1.3.1(H) Energy-Related Activities and Structures. Including submitting an acceptable Certified Verification Agent (CVA).

1.3.1(I)	Dredging and dredged material disposal	SouthCoast has demonstrated compliance with 1.3.1(I) Dredging and Dredged Material Disposal.
1.3.1(J)	Filling in tidal waters	Cable burial isn't considered a traditional filling of tidal waters. However, there are some aspects of this process that merit review of these regulations. After staff review, SouthCoast has demonstrated compliance with 1.3.1(J) Filling in tidal waters.
1.3.1(R)	Submerged aquatic vegetation and aquatic habitats of particular concern	Please see the relevant section on Submerged Aquatic Vegetation for more details. In summary, staff have concluded that there will be no impact on SAV.
1.3.3	Inland Activities and Alterations that are Subject to Council Permitting	The only inland activities are the underground cable and related connection points. SouthCoast has demonstrated compliance with 1.3.3 Inland Activities and Alterations that are Subject to Council Permitting
1.3.5	Policies for the Protection and Enhancement of the Scenic Value of the Coastal Region	The onshore export cables will be installed underground, and the offshore export cables are submarine cables. Therefore, these Project components will not be visible after construction is completed. More details are located in application section 4-47. SouthCoast has demonstrated compliance with 1.3.5 Policies for the Protection and Enhancement of the Scenic Value of the Coastal Region.

1.3.6	Protection and Enhancement of Public Access to the Shore	The Boyds Lane landing location is adjacent to Island Park Beach. While there is no construction happening within the Island Park Beach itself, there may be disruptions during the staging and installation of the cable. This is expected to be temporary and limited to the duration of the installation process. SouthCoast will develop a construction schedule that will avoid major events. Once construction begins, SouthCoast Wind will also have a construction webpage available to the public and will maintain an updated construction schedule and alert abutters, residents, and other stakeholders of construction locations, dates, activities, and traffic control measures.

10. Public Comments:

This Project's public notice was issued on November 13, 2024, for a 68-day comment period concluding on January 20, 2025.

1. Substantive:

a. Save The Bay: Jed Thorp, Director of Advocacy at Save The Bay provided comments via email on December 24, 2024. These comments were neither in support of nor opposed to the project. The specific comments and concerns are addressed below.

Sediment Testing: Save The Bay is concerned by the lack of sediment testing data, particularly in Mount Hope Bay and in the vicinity of the proposed horizontal directional drilling (HDD) pits. This concern is based on the significant past industrial discharges along the Taunton River and Mount Hope Bay. Studies, and the Narragansett Bay Estuary Program's most recent State of Narragansett Bay and its Watershed report have identified elevated levels of heavy metals and other contaminants based on historic uses and discharges. Targeted sediment testing should be required prior to dredging if there is no recent data available on contaminant levels immediately in and around the HDD pits and export cable route.

Staff Response: SouthCoast Wind has applied for and received a 401 and State Water Quality Certification from RI DEM. SouthCoast Wind has analyzed benthic sediments for grain size distribution and has completed hydrodynamic and sediment dispersion modeling for the offshore cable installations and the HDD installations to evaluate potential short-term effects on water quality during sediment excavation.

For sediment chemistry, the Water Quality Certification and Dredge Permit issued by RI DEM for the Project requires SouthCoast Wind to submit a sediment sampling and analysis plan for RI DEM review and approval. Sediment sampling test results are required to be submitted to RI DEM for review and approval at least 90 days prior to the commencement of dredging and cable jet plow installation. If sediment testing and analysis result in a water quality standard not being met pursuant to Rule 1.10 of the Water Quality Regulations, a mitigation plan will be required for RI DEM review and approval.

In October 2023, sediment sampling and chemistry analysis was conducted for the SouthCoast Wind export cable and HDD pits in Massachusetts state waters including Mount Hope Bay. Sediments were tested for metals, polyaromatic hydrocarbons, polychlorinated biphenyls, petroleum hydrocarbons, and volatile organic compounds. The sediment analytical results were compared to Massachusetts' most stringent soil reportable concentrations and risk-based soil standards under the Massachusetts Contingency Plan (MCP, 310 CMR 40.0975) for water quality indicative purposes. None of the analytes tested for in project sediment samples exceeded the most stringent reportable concentrations for soil.

Cable Burial: As Rhode Island has learned from the Block Island Wind Farm, cable burial depth is critical to the successful operation of the project. The applicant states that "anticipated cable burial depth range is 3.2 to 13.1 ft with a target cable burial depth of 6.0 feet" (Application § 2.3.1). Save The Bay urges CRMC to carefully review all areas where the applicant claims that target burial depth may not be met. Proper seabed preparation and cable burial reduces future risks to marine species and other users of Narragansett Bay. With regard to seabed preparation, Save The Bay urges the applicant to employ micro-siting of the cable route to avoid boulder relocation to the greatest extent possible to prevent conflict with fishers. If boulder relocation is necessary, the applicant should prioritize use of a boulder grab over a boulder plow to limit impacts to benthic and other habitats. Increased cost should not be considered as justification to use more invasive methods. The waters potentially impacted by the cable construction are highly valuable for a myriad of economically important fisheries. **It is imperative that, if permitted, CRMC requires the applicant to minimize impacts to fisheries to the greatest extent possible, without regard to cost.** (emphasize Save The Bay) Specifically, the applicant estimates that approximately 15% of the export cable construction will require secondary cable protection (Application § 2.3.9). Save The Bay urges the applicant to use the least invasive secondary protection possible to avoid gear snags and other impacts to the fishery. Because the public has no access to SouthCoast's confidential Cable Burial Risk Assessment (submitted as part of its application to CRMC), the public must rely on CRMC's expert analysis in this area and trust that, if permitted, CRMC will put stringent conditions on cable installation requirements to ensure the least impact practicable to benthic and other habitats.

Staff Response: Staff have compiled several conditions that SouthCoast has agreed to that are designed to address these concerns.

Electromagnetic Fields (EMF): Although research in this field is still developing, the application notes, and Save The Bay agrees, that marine species, especially sessile species, will potentially be impacted by EMFs. The applicant also states that "the weight of currently available scientific evidence does not provide support for concluding there would be population-level harm to marine species from EMFs associated with HVDC submarine transmission" (Application § 3.3.2). However, EMF exposure risk from subsea cables does exist. Potential exposure to EMFs, either short or long-term, depends greatly on cable burial depth and cable burial requirements. **Achieving optimal target burial depth can greatly reduce EMF impacts to benthic species.** (emphasize Save The Bay) Careful cable routing and burial depth must be prioritized over other factors such as cost in order to mitigate impacts, including avoidance of Essential Fish Habitat and other sensitive habitats where possible. In addition, requiring the applicant, if permitted, to conduct robust on-going research and monitoring, is essential to further understanding any realized impacts to benthic habitat and species, especially in the early life stages of such species.

Staff Response: Staff have addressed EMF impacts in the main body of this report in the relevant section. EMF monitoring is also addressed in stipulations 21 and 22 of this report.

b. RISAA: Scott Travers, Executive Director of the Rhode Island Saltwater Anglers Association (RISAA) provided comments via email on December 26, 2024. These comments urge CRMC to reject this application based on the impacts from the cable route up the Sakonnet River. This includes impacts to recreational and commercial fishing, boating, and other uses in the area. Potential threats to the fisheries specify citing cod and striped bass. Including concerns over potential impacts from EMF. RISAA believes that a land-based alternative cable route would remove any of the aforementioned impacts.

Staff Response: Staff have reviewed the project for impacts on recreational and commercial fishing, boating, and other uses in the area. Staff reviews and believe that such impacts will be temporary and time limited in the area within the Sakonnet River. Fish species such as Cod and Striped Bass are expected to return after construction has moved on from the local area. For further details, please see the relevant sections of the report.

SouthCoast Wind submitted as part of their application Attachment B - Route Alternatives Assessment. In this assessment several onshore routes were evaluated and SouthCoast concluded that these route alternatives should be dismissed due to a variety of engineering, construction, environmental, and other stakeholder concerns. Staff reviewed the Route Alternatives Assessment and determined that the selected route meets the applicable standards listed above. As stated above, Staff does not see any relocation of this project as a reasonable alternative.

c. Town of Little Compton and Town of Middletown: Marisa Desautel on behalf of the Town of Little Compton and the Town of Middletown submitted two comments via email on January 20, 2025. The Town of Little Compton and the Town of Middletown request a public hearing be

held on this application for concerned parties to "voice their perspectives and allow for a thorough consideration of all relevant factors". Given the similar nature of these comments both will be addressed together in this section, with notes where there were differences.

The Town of Little Compton and the Town of Middletown assert that CRMC cannot approve the application for being inconsistent with CRMC's policies. The Town of Little Compton and the Town of Middletown both assert that the SouthCoast Wind application must be denied.

This request for denial highlights the following polices. CRMC's Ocean SAMP § 11.10.1(C), which states that "*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. In making the evaluation of the effect on human uses, the Council will determine, for example, if there is an overall net benefit to the Rhode Island marine economic sector from the development of the project or if there is an overall net loss. 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 CZMA federal consistency reviews, require that the applicant modify the proposal to avoid and/or mitigate the impacts or the Council shall deny the proposal*." (Emphasis added by Marisa Desautel).

The Town of Little Compton and the Town of Middletown assert SouthCoast has fallen short of this policy, as the benefit of the electricity to Rhode Island must be weighed against the detrimental cost to the consumer and in this case, the Towns, associated with the construction, maintenance, and decommissioning of the undersea cable. The Towns assert there will be significant adverse impacts from the proposed project. Therefore, project modifications and/or mitigation measures are necessary. Given that the proposed cable route is located less than one (1) mile off the coast of the Town, the project, at installation, operation, maintenance as well as at decommissioning, will cause direct impacts to recreation, revenue, navigation, and fishing activities for the community. The Town expects significant project mitigation and/or mitigation measures will be required to offset these impacts. Until project modification has occurred or adequate mitigation measures have been identified to address these issues, the Town recommends that CRMC find the proposed project inconsistent with this Enforceable Policy.

The Town of Little Compton and the Town of Middletown each state that SouthCoast has fallen short of this policy, as follows:

The proposed Project will negatively impact navigation as the Town is a stopover point for boats heading East to Martha's Vineyard and Nantucket, and that require safe harbor in deteriorating weather conditions. This will have a significant adverse impact on human use.

The presence of subsea hazards from the installation, operation, maintenance and decommissioning of the cables as well as any electromagnetic field emitted from the cables while in operation will cause disruption to the Town's coastline.

Views, water access, and navigation will be adversely affected during installation, operation, maintenance, and decommissioning of the proposed cables as well as associated turbines and platforms.

The Town's shoreline, its restaurants, recreational activities, commercial shellfishing, and lobstering will be disturbed. This includes navigation-related interference and buoys, vessel traffic safety, damage to fishing gear, and the environment.

From the Town of Little Compton only
The Town's commercial and recreational fishing will be negatively affected during the proposed activities and the Town is among the top ten (10) ports with the highest annual average fish landings from 2008 to 2018 within the offshore cable corridor. See Category B Application Table 7-10 and Section 7.5.4.[39]

Staff Response: In general, the construction will be conducted off-season for major recreational activity and recreational fishing activities. SouthCoast has proposed a compensatory mitigation package for impacts on revenue and fishing activities in consultation with CRMC's Fishermen's Advisory Board and fisheries experts at the Woods Hole Oceanographic Institution (WHOI). SouthCoast vessel will be working in coordination with the United States Coast Guard to ensure safe navigation. Staff have reviewed these concerns in more detail in the relevant section of this report.

CRMC's Ocean SAMP Regulation § 11.10.1(E): The Council shall prohibit any other uses or activities that would result in ***significant*** **long-term negative impacts** to Rhode Island's commercial or recreational fisheries. Long-term impacts are defined as those that affect more than one or two seasons. (Emphasis added in bold by Marisa Desautel) (Emphasis added in underline, bold, and italics by Staff)

The Town of Little Compton and the Town of Middletown has provided the follow as "Why SouthCoast Falls Short"

From the Town of Little Compton
Despite SouthCoast's response, a further look at the COP reveals that impacts of up to three (3) years are actually stated as expected. According to the COP:

From the Town of Middletown
According to SouthCoast, impacts of up to three (3) years are expected. Since the project will have this impact, and where avoidance is not possible, impacts should be minimized to the

[39] The corresponding section and page in the September 2024 revised Category B application is section 3.5.1.2, page 3-64.

greatest extent possible, and so mitigation measures have to at least be identified. As the Applicant has incorrectly indicated that the project is not expected to have any concerning impact, the Town requests that the CRMC find the project inconsistent.

Together the towns have submitted
"Benthic and shellfish resources have the potential to be exposed to various IPFs in the Offshore Project Area during all phases of the proposed Project, such as introduced sound, seabed disturbance, habitat disturbance and modification, EMFs, planned discharges, and accidental events….Recolonization of the complex habitats in…isolated segments of the Brayton Point export cable corridor, is expected to occur **over periods of 1 to 3 years.**" See COP Vol. II at Pg 300. (Emphasis added by Marisa Desautel)

"Benthic EFHs for egg and larval fish life stages and benthic invertebrate communities are expected to recolonize the area after construction activities have concluded. This may occur within months or **one to three years** following disturbance." See COP Vol. II at Pg. 331. (Emphasis added by Marisa Desautel)

"The long-term recovery time of hard bottom EFHs expected to occur along the export cable corridors (particularly in the northern portion) may cause a temporary shift in the benthic community composition, which **could have permanent effects on the benthic habitat** (BOEM, 2021)" See COP Vol. II at Pg. 335 (Emphasis added by Marisa Desautel)

Since the project is expected to have this kind of an impact, and where avoidance is not possible, impacts should be minimized to the greatest extent possible, and as a result, mitigation measures should be identified. As SouthCoast has incorrectly described the proposed project's impacts, the Town requests that the CRMC find the project inconsistent with this Enforceable Policy.

Staff Response: Staff does estimate that the Benthic Habitat will be fully recovered in 1 to 3 years. This estimate is longer than the 1 or 2 seasons, however, staff does not believe that the impacts from the export cables are considered significant. This is because there is a relatively small percentage of habitat affected and the availability of similar habitats in the surrounding area.

Juvenile Cod habitats are closer to shore than the impacts from the cable installation will reach. The closest patch of Submerged aquatic vegetation (SAV) is well outside the range of sediment disposition.

Glacial moraine makes up about 3.1% of the Export Cable Corridor and with mapping and cable micro-siting adjustments a large share can be avoided. When boulder relocations become necessary, they will be moved nearby to allow the area to retain its characteristics. Therefore, this amount of impact is not considered significant by Staff.

CRMC's Ocean SAMP Regulation § 11.10.1(F): The Council shall require that the potential adverse impacts of offshore developments and other uses on commercial or recreational fisheries

be evaluated, considered and mitigated as described in § 11.10.1(G) of this Part. (Emphasis added by Marisa Desautel).

The Town of Little Compton and the Town of Middletown, have provided the following as "Why SouthCoast Falls Short":
according to the above response, impacts to commercial and recreational fisheries must be addressed. Until such time as these impacts have been properly evaluated, considered and/or mitigated, the Town requests that the CRMC find the project is inconsistent with this Enforceable Policy.

Staff Response: CRMC's Ocean SAMP Regulation § 11.10.1(F) is addressed in the relevant sections of this report.

CRMC's Ocean SAMP Regulation § 11.10.1(G): "*For the purposes of fisheries policies and standards as summarized in Ocean SAMP Chapter 5, Commercial and Recreational Fisheries, §§ 5.3.1 and 5.3.2 of this Subchapter, mitigation is defined as a process to make whole those fisheries user groups, including related shore-side seafood processing facilities, that are adversely affected by offshore development proposals or projects. Mitigation measures shall be consistent with the purposes of duly adopted fisheries management plans, programs, strategies and regulations of the agencies and regulatory bodies with jurisdiction over commercial and recreational fisheries, including but not limited to those set forth above in § 11.9.4(B) of this Part. Mitigation shall not be designed or implemented in a manner that substantially diminishes the effectiveness of duly adopted fisheries management programs. Mitigation measures may include, but are not limited to, compensation, effort reduction, habitat preservation, restoration and construction, marketing, and infrastructure and commercial fishing fleet improvements. Where there are potential impacts associated with proposed projects, the need for mitigation shall be presumed (see § 11.10.1(F) of this Part). Mitigation shall be negotiated between the Council staff, the FAB, the project developer, and approved by the Council. The final mitigation will be the mitigation required by the CRMC and included in the CRMC's Assent for the project or included within the CRMC's federal consistency decision for a project's federal permit application.*" (Emphasis added by Marisa Desautel)

The Town of Little Compton and Town of Middletown, have provided text as "Why SouthCoast Falls Short", which staff will summarize as: CRMC being unable to utilize their Fisherman's Advisory Board.

Staff Response: CRMC's Fishermen's Advisory Board was reestablished in 2025 with new members and met several times with SouthCoast for their application review.

CRMC's Ocean SAMP Regulation § 11.10.1(I): "The finfish, shellfish, and crustacean species that are targeted by commercial and recreational fishermen rely on appropriate habitat at all stages of their life cycles. 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. The Council shall protect sensitive habitat areas where they have been identified through the Site Assessment Plan or Construction and Operation Plan review processes for offshore developments as described in § 11.10.5(C) of this Part." (Emphasis added by Marisa Desautel)

From the Town of Little Compton
The Town of Little Compton has provided the following assertion as "Why SouthCoast Falls Short": The response given by applicant to § 11.10.2(C)(3) fails to address impact to spawning and nursery areas for finfish, shellfish, or crustacean species. Further, the response to § 11.10.1(E) only addresses impacts to fishing grounds and commercial and recreation fisheries generally. As a result, there has been no response from the applicant on spawning and nursing areas.

From the Town of Middletown
The SouthCoast response does not address the impacts to the spawning and nursery areas of finfish, shellfish, or crustacean species. Further, the response given only addresses impacts to fishing grounds and commercial and recreation fisheries, not spawning and nursing areas. The Town requests that the CRMC find the project is inconsistent with this policy. According to the application at pg 137: "Impacts from Project activities related to installation of the export cable in shallow nearshore…waters may temporarily directly affect winter flounder eggs, YOY, and spawning adults…winter flounder…may experience small amounts of permanent habitat loss in areas that are converted from sandy sediments to hard bottom habitats should secondary cable protection be needed" Category B Application at Page 137. It is not a question whether secondary cable protection is needed. There is an estimate of approximately 15% of the ECC that will require secondary cable protection, See November 13, 2024, Public Notice. Project alternatives must be considered and mitigation measures identified in an effort to protect spawning and nursery resources.

Staff Response: The species spawning and nursery areas were addressed to staff satisfaction in "Affected Environment, Potential Impacts, and Proposed avoidance, minimization, and Mitigation" section of the SouthCoast Wind application.

CRMC's Ocean SAMP Regulation § 11.10.1(K): "The potential impacts of a proposed project on **cultural and historic resources** will be evaluated in accordance with the National Historic Preservation Act and Antiquities Act, and the Rhode Island Historical Preservation Act and Antiquities Act as applicable. Depending on the project and the lead federal agency, the projects that may impact marine historical or archaeological resources identified through the joint agency review process may require a marine archaeology assessment that documents actual or potential impacts the completed project will have on submerged cultural and historic resources." (Emphasis added by Marisa Desautel)

The Town of Little Compton has provided the following assertion as "Why SouthCoast Falls Short": There exist historical sites within the proposed cable area. "PAL recommends that these sites are potentially eligible for listing in the National Register under Criteria A and D…PAL recommends archaeological monitoring of cable duct trench excavation near the sites." Category B Application at Page 100. "Avoidance zones have been identified around sensitive marine cultural resources and cable routing will not go through these areas to the extent practicable." Id. at Page 171. The Town is prevented from commenting fully as the Historic Properties Treatment Plan is confidential. It is the Town's position that until a public mitigation plan is released, that the CRMC must find the project inconsistent.

Staff Response: A final Memorandum~~s~~ of Agreement (MOA) as part of the Section 106 of the National Historic Preservation Act (NHPA) was executed on December 18, 2024 by SouthCoast Wind and the RI Historical Preservation and Heritage Commission (RIHPHC), among other Section 106 Consulting Parties, to address/mitigate impacts on Historic properties and Archaeological Resources. CRMC defers to RIHPHC and the Tribes in their capacities as Consulting Parties under the Section 106 process. SouthCoast Wind will be bound by the terms of the MOA entered into as part of the Section 106 of the NHPA process, and as such, CRMC regulatory authority over paleolandscapes will be satisfied by that MOA under the Section 106 process. This requirement is also addressed in stipulation 23 of this report.

With the sensitive nature of the material and the expertise reviewing the Historic Properties Treatment Plan, staff does not believe that a public mitigation plan is needed to meet this regulation. In addition, federal law restricts the disclosure of information about historic properties to the public to essentially protect sites from harm, theft, or destruction of cultural resources. This is standard and best practice for federal and state regulatory agencies. See Section 304 of the National Historic Preservation Act and Section 9 of the Archaeological Resources Protection Act.

CRMC's Ocean SAMP Regulation § 11.10.1(M): "The potential non-physical impacts of a proposed project on cultural and historic resources shall be evaluated in accordance with 36 C.F.R. § 800.5, assessment of adverse effects, including the introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features. Depending on the project and the lead federal agency, the Ocean SAMP Interagency Working Group may require that a project undergo a visual impact assessment that evaluates the visual impact a completed project will have on onshore cultural and historic resources."

(N): "A visual impact assessment may require the development of detailed visual simulations illustrating the completed project's visual relationship to onshore properties that are designated National Historic Landmarks, listed on the National Register of Historic Places, or determined to be eligible for listing on the National Register of Historic Places. Assessment of impacts to specific views from selected properties of interest may be required by relevant state and federal

agencies to properly evaluate the impacts and determination of adverse effect of the project on onshore cultural or historical resources."

(O): "A visual impact assessment may require description and images illustrating the potential impacts of the proposed project."

The Town of Little Compton has provided the following as "Why SouthCoast Falls Short":, The proposed project will affect views during installation, operation, maintenance, and decommissioning. It is reasonable to expect that boats, barges, cranes, or other equipment will be used, positioned, left, parked or advanced at any given point and along the cable route as installed and after that as needed and then for decommissioning. A visual impact assessment should be completed for the visual, atmospheric, and audible adverse effects that the Town will have to face resulting from the project. Without such plan it is impossible for the Town to adequately assess impacts. Until a visual impact assessment is done and measures are determined to mitigate these adverse effects, the Town requests that the CRMC find the project inconsistent.

The Town of Middletown has provided the following as "Why SouthCoast Falls Short": The proposed project will affect views during installation, operation, maintenance, and decommissioning off the Town's shores. There can be no doubt that vessels, barges, cranes or other equipment will be necessary at the point of installation and all along the cable route, at the time it is installed, on every occasion it is maintained and when it is removed at decommissioning (assuming that removing it is included as part of the decommissioning process). A visual impact assessment has to be completed for the visual, atmospheric, and audible adverse effects (as is required) that the Town will face resulting from the proposal. Until this is done, the Town has the chance to review the information, and measures are determined that will mitigate effects, the CRMC has to find the project inconsistent.

Staff Response: All visual impacts from vessels used in installation, operation, maintenance, and decommissioning are considered temporary and in line with the current visual profiles viewed frequently in Narragansett Bay. Staff believe this satisfies the regulation.

CRMC's Ocean SAMP Regulation § 11.10.2(C)(2) "*Offshore dive sites within the Ocean SAMP area, as shown in Figure 2 in § 11.10.2 of this Part, are designated Areas of Particular Concern. The Council recognizes that offshore dive sites, most of which are shipwrecks, are valuable recreational and cultural ocean assets and are important to sustaining Rhode Island's recreation and tourism economy*. (Emphasis added by Marisa Desautel).

The Town of Little Compton has provided the following assertion as "Why SouthCoast Falls Short": The proposed cable location is very close to Dive Site P.T. Teti. At only 115 ft. Until project modifications have occurred, or adequate mitigation measured have been identified to facilitate the protection of this site, the Town believes that CRMC must find that the proposed project is inconsistent.

Staff Response: As noted by the Town of Little Compton, the cable route doesn't enter the area of the Dive Site P.T. Teti. Therefore, staff finds the project consistent with this policy.

CRMC's Ocean SAMP Regulation § 11.10.2(C)(3): "***Glacial moraines*** *are important habitat areas for a diversity of fish and other marine plants and animals because of their relative structural permanence and structural complexity. Glacial moraines create a unique bottom topography that allows for habitat diversity and complexity, which allows for species diversity in these areas and creates environments that exhibit some of the highest biodiversity within the entire Ocean SAMP area. The Council also recognizes that because glacial moraines contain valuable habitats for fish and other marine life, they are also important to commercial and recreational fishermen. Accordingly, the Council shall designate glacial moraines as identified in Figures 3 and 4 in § 11.10.2 of this Part as Areas of Particular Concern*." (Emphasis added by Marisa Desautel).

The Town of Little Compton has provided the following assertion as "Why SouthCoast Falls Short": Approximately 185 acres of the ECC are mapped as moraine habitat. Construction, operations, maintenance and decommissioning of the cable in these areas will result in adverse impacts to habitats for fish and marine life and will therefore negatively impact marine plants and animals, affecting fishing resources and therefore Town and its residents. For this reason, the proposal requires further mitigation measures for those glacial moraine areas that will be impacted by the ECC and the habitat it provides. Until such time as this is done, the proposed project is inconsistent.

The Town of Middletown has provided the following assertion as "Why SouthCoast Falls Short": 185 acres of the ECC were mapped as moraine habitat. Construction, operations, maintenance and decommissioning in the areas will result in adverse impacts to habitats, this will negatively impact marine plants and animals, further affecting fishing resources and the Town's community. Again, the proposed project requires further mitigation and management measures to be identified for those glacial moraine areas that will be impacted. Until this is done, the proposed project inconsistent.

Staff Response: Glacial moraine makes up about 3.1% of the Export Cable Corridor and with mapping and cable micro-siting adjustments a large share of this can be avoided. When boulder relocations become necessary, they will be moved nearby to allow the area to retain its characteristics. Therefore, this amount of impact is not considered significant by Staff.

CRMC's Ocean SAMP Regulation § 11.10.2(C)(4): "*Navigation, military, and infrastructure areas including: designated shipping lanes, precautionary areas, recommended vessel routes, ferry routes, dredge disposal sites, military testing areas, unexploded ordnance, pilot boarding areas, anchorages, and a coastal buffer of 1 km as depicted in Figure 5 in § 11.10.2 of this Part are designated as Areas of Particular Concern. The Council recognizes the importance of these areas to marine transportation, navigation and other activities in the Ocean SAMP area*." (Emphasis added by Marisa Desautel).

The Town of Little Compton and the Town of Middletown have provided the following assertion as "Why SouthCoast Falls Short": Ocean SAMP § 11.10.2(I) Figure 5 illustrates the designated shipping lanes in the area, and the proposed ECC runs through two of these shipping lanes. The construction of the ECC will disrupt these lanes. The Towns therefore ask that the CRMC find the project to be inconsistent.

Staff Response: This comment seems to presume that any impacts of any severity on Areas of Particular Concern for shipping lanes are rational for rejection of any CRMC application. This is a misinterpretation of CRMC regulation and guidance. Under Section § 11.10.2(B) ... Applicants "must also demonstrate that all feasible efforts have been made to avoid damage to APC resources and values and that there will be no significant alteration of the APC resources or values." In accordance with this regulation staff review has found that SouthCoast has made all feasible efforts to avoid damage and that the project will not significantly alter the shipping lanes. The impacts will be both temporary and will be in coordination with the federal authorities such as United States Coast Guard and United States Navy. Staff find SouthCoast consistent with this regulation.

CRMC's Ocean SAMP Regulation § 11.10.2(C)(5): "***Areas of high fishing activity*** *as identified during the pre-application process by the Fishermen's Advisory Board, as defined in § 11.3(E) of this Part, may be designated by the Council as Areas of Particular Concern*." (Emphasis added by Marisa Desautel).

The Town of Little Compton and the Town of Middletown have provided the following assertion as "Why SouthCoast Falls Short", The Project will have negative effects on fishing activity. While not all inclusive, the following are of particular concern to the Town: Fish Traps. There are several licenses for fish traps at the mouth of the Sakonnet River Commercial Fishing Activities. There are several commercial fishing techniques used near the cable landfall (bottom trawl, pots, trap fishing). Id at Page 153. Little Compton's port earns the fourth highest revenue in the ECC area, bringing in an annual average of $120,977. Id at Page 149 table 3-19. Commercial and recreational fishermen may be excluded from actively fishing or transiting during construction. Id. at 156. Recreational Fishing. There are recreational fishing boats that transit through the ECC. Brown's Ledge and Sachuest Point National Wildlife Refuge [Breakwater at Sakonnet (little Compton)] is a for-hire recreational fishing location for targeting scup, black sea bass, striped bass, summer flounder, and bluefish. Impacts to the habitats of these fish can have a great impact on the economy of the Town and its residents if there is a decrease in fish to catch for these for-hire recreational fishing businesses. The species are expected to experience disturbance resulting from cable burying and disturbance to the seafloor. Id. Gear loss. Gear may become entangled in cables or other Project components. SouthCoast Wind has stated that they will work with fishermen through a lost gear claims form process "to determine if reimbursement is warranted." Id. at 157. The fishermen will potentially have their gear destroyed by the project, and are not guaranteed reimbursement for the damages done to their property that allows them to make a living. Steam Times. Commercial and recreational

fisherman may have to extend their routes to obtain access to fishing grounds during the time of construction of the Project. Id. Additional Concerns. If fishing is impacted, many fishermen will move to conduct their efforts in a different geographical area, outside of Rhode Island. A lack of fish, or larger fish that is targeted by commercial and recreational fishermen will prove to be a significant loss to the fishing community of the Town. Cumulative Impacts. There has been insufficient discussion of the potential adverse impact of future wind farm project activities in the area. There are numerous wind farm projects happening along the coast of Rhode Island and neighboring states. Together, the adverse impact of these projects is exponentially greater than what has been considered.

Staff Response: See the mitigation and compensation section. SouthCoast Wind has been working with the FAB, an advisory process overseen by CRMC staff, to create an acceptable analysis for review of any potential coastal effects and potential cumulative impacts resulting from the construction and operation of the project. During operations and maintenance, commercial and recreational fisheries are expected to experience no effects from the presence of the offshore export cables because they will be buried beneath the seabed.

SouthCoast Wind has committed to several measures to avoid, minimize, or mitigate impacts on fisheries. See also, Stipulations 18 (Submerged Cable Fisheries Monitoring Plan) and 19 (Fisheries Representative).

Further, recent construction at the Sakonnet River has occurred at the hands of the Algonquin Gas Transmission's natural gas pipeline, only increasing the level of disturbance to the project area. Protesters requested that the Federal Energy Regulatory Commission reject Algonquin's request for authorization to perform its maintenance project due to "impermissible segmentation, inadequate environmental review, an increase in greenhouse gas emissions, and a lack of need for the project." See FERC Order Denying Protests and Authorizing Construction Page 6. These protests were denied due to the FERC finding that the Algonquin project would not significantly affect the "quality of the human environment" Id. at Page 1. Although the Algonquin project may not significantly affect the "human environment" alone, allowing additional projects that will cause disruption can and will amount to a significant adverse effect on the environment and the Town.

Staff Response: The comment regards the notion that additional projects in this are similar to the Algonquin Gas Transmission's natural gas pipeline such as the SouthCoast Wind export cable and more projects that are yet unnamed and unknown, which would result in a cumulative impact on the "human environment" significant enough to deny the present day SouthCoast Wind export cables.

Staff believe that projects of these types are not frequent or impactful enough to warrant such a proactive suggestion.

CRMC's Ocean SAMP Regulation § 11.10.2(C)(6): "*Several heavily used **recreational boating** and sailboat racing areas, as shown in Figure 6 in § 11.10.2 of this Part, are designated as Areas of Particular Concern. The Council recognizes that organized recreational boating and sailboat racing activities are concentrated in these particular areas, which are therefore important to sustaining Rhode Island's recreation and tourism economy*." (Emphasis added by Marisa Desautel).

The Town of Little Compton and the Town of Middletown has provided the following assertion as "Why SouthCoast Falls Short": Figure 6 in § 11.10.2(I) illustrates the recreational boating areas off the coast, and the proposed cable traverses through these areas. There is no possibility that SouthCoast can avoid an adverse impact on these recreational boating areas during the construction, operation, maintenance or decommissioning of the cables. For this reason, the Town believes CRMC should find the proposed project inconsistent.

Staff Response: This comment seems to presume that any impacts of any severity on Areas of Particular Concern for recreational activity are rational for rejection of any CRMC application. This is a misinterpretation of CRMC regulation and guidance. Under Section § 11.10.2(B) ... Applicants "must also demonstrate that all feasible efforts have been made to avoid damage to APC resources and values and that there will be no significant alteration of the APC resources or values." In accordance with this regulation staff review has found that SouthCoast has made all feasible efforts to avoid damage and that the project will not significant alter the recreational boating activity. The impacts will be both temporary and will avoid organized recreational activity as shown in Figure 6 in § 11.10.2(I) of the Ocean SAMP. Staff find SouthCoast Wind consistent with this regulation. *See* Assent Application, Section 3.8 Recreational Boating and Tourism. During construction, SouthCoast Wind intends to maintain access for recreational boating while maintaining safe separation distances from construction vessels, resulting in temporary impacts. SouthCoast Wind will implement construction safety zones in consultation with local communities, the recreational boating community and the USCG and communicate to local mariners regarding upcoming and ongoing construction activities within the ECC.

CRMC's Ocean SAMP Regulation § 11.10.3(A)(1): "Areas Designated for Preservation are designated in the Ocean SAMP area in state waters for the purpose of preserving them for their ecological value. Areas Designated for Preservation were identified by reviewing habitat and other ecological data and findings that have resulted from the Ocean SAMP process. Areas Designated for Preservation are afforded additional protection than Areas of Particular Concern (see § 11.10.2 of this Part) because of scientific evidence indicating that large-scale offshore development in these areas may result in significant habitat loss. The areas described in § 11.10.3 of this Part are designated as Areas Designated for Preservation. The Council shall prohibit any large-scale offshore development, mining and extraction of minerals, or other development that has been found to be in conflict with the intent and purpose of an Area Designated for Preservation. Underwater cables are exempt from this prohibition. Areas Designated for Preservation include:

1. Ocean SAMP **sea duck foraging habitat** in water depths less than or equal to 20 meters [65.6 feet] (as shown in Figure 8 in § 11.10.2 of this Part) are designated as Areas Designated for Preservation due to their ecological value and the significant role these foraging habitats play to avian species, and existing evidence suggesting the potential for permanent habitat loss as a result of offshore wind energy development. The current research regarding sea duck foraging areas indicates that this habitat is depth limited and generally contained within the 20 meter depth contour. It is likely there are discreet areas within this region that are prime feeding areas, however at present there is no long-term data set that would allow this determination. Thus, the entire area within the 20 meter contour is being protected as an Area Designated for Preservation until further research allows the Council and other agencies to make a more refined determination." (Emphasis added by Marisa Desautel).

The Town of Little Compton and the Town of Middletown has provided the following assertion as "Why SouthCoast Falls Short": The sea ducks to be displaced due to the project and one of their food sources will be negatively impacted. According to the project submittals: "Sea ducks are…vulnerable to displacement" COP Vol. II at Page 157. "Marine birds, including sea ducks and loons may be disturbed by introduced sound in the Lease Area and export cable corridors that result from increased vessel traffic and construction activities" Id. at Page 175. "Construction in the Lease Area…will temporarily disturb the seafloor, which will temporarily affect foraging, particularly on such prey items like sand lance…, within the Lease Area for some marine birds such as…sea ducks." Id. at Page 174. There is no long-term data to quantify the impact that offshore wind has on sea duck foraging habitats. Even in the absence of long-term data, any adverse impacts to sea duck foraging habitats should be mitigated. The Town requests CRMC find the proposal inconsistent until further plans to mitigate impacts are created.

Staff Response: Impacts on diet and habitat preferences will be minimal and temporary within a small area, due to the availability of similar habitats nearby. See Assent Application section 5-41 for more details. The sea duck tends to feed nearer to the shore than the area of the cable route leaving only the smaller onshore HDD as potential impact. Staff does not find the proposal as inconsistent. See relevant sections of the report for more detail.

CRMC's Ocean SAMP Regulation § 11.10.3(A)(3): "The Council shall prohibit any offshore development in areas identified as Critical Habitat under the Endangered Species Act."

The Town of Little Compton and the Town of Middletown has provided the following assertion as "Why SouthCoast Falls Short": There is not a critical habitat designated for the Roseate Tern, it is a threatened species that is found within the Project area. The Roseate Tern "is not a bird of conservation in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development of activities" See Appendix J at Page 175. Additionally, the Roseate Tern breeds from May – August in the project area. See Appendix J at Page 185. Being that there is a threatened species that uses the project area for

breeding, the Town urges that the CRMC consider voting that this project is inconsistent or in the alternative enforcing mitigation measures associated with the protection of susceptible wildlife species.

Staff Response: Impacts on diet and habitat preferences will be minimal and temporary, due to the availability of similar habitats nearby. Construction effort will be taken outside the window of the mating season. Staff does not view the potential impact on the Roseate Tern as reason to object. See relevant sections of the report for more detail and the Assent Application at 3-12 and 3-83. USFWS concurred with BOEM's determination that the Project is not likely to adversely affect roseate tern.

CRMC's Ocean SAMP Regulation § 11.10.4(A): "Large-scale projects or other development which is found to be a hazard to commercial navigation shall avoid areas of high intensity commercial marine traffic in state waters. Avoidance shall be the primary goal of these areas. Areas of high intensity commercial marine traffic are defined as having 50 or more vessel counts within a 1 km by 1 km grid, as shown in Figure 9 in § 11.10.4(B) of this Part."

The Town of Little Compton and the Town of Middletown have provided the following assertion as "Why SouthCoast Falls Short", Although the application is for proposed cables that are to be buried under the seafloor, the associated construction, operation, maintenance, and decommissioning of the cables will involve vessels in the area. The Sakonnet River is commonly used by private and commercial vessels and the project will affect this navigation. Without an appropriate mitigation measure in place, the CRMC must find the project inconsistent.

Staff Response: SouthCoast Wind has submitted a Navigational Safety Risk Assessment; staff review of the assessment determined that SouthCoast is consistent with this regulation.

The Town of Little Compton and the Town of Middletown has submitted the following conclusion to these comments
"Given the impacts indicated including the lack of engagement with a FAB, the lack of mitigation measures identified or even discussed to address impacts, SouthCoast has failed to demonstrate consistency on almost every Ocean SAMP Enforceable Policy. For these reasons, the proposed project is inconsistent and cannot be approved."

Staff Response: The CRMC's Fisherman's Advisory Board was engaged with this process; staff has reviewed the mitigation measures and have found them consistent. Staff has reviewed the SouthCoast Wind project and has found it consistent with CRMC's Ocean SAMP regulation and recommends approval.

"To the extent mitigation measures are possible, the Town (Town of Little Compton and the Town of Middletown) suggests that, at a minimum, the following be implemented by SouthCoast (in addition to previously approved conditions in state assent process):"

1. All efforts shall be undertaken to avoid interactions with mobile and static fishing gears and to notify the fishing public of when and where deployments, surveying, and maintenance are taking place. All deployed gear shall be maintained regularly to avoid damage/loss that may interfere with transiting vessels or fishing gear. This includes 24 hour monitoring by at least two boats when cables are laid.

Staff Response: This is already in SouthCoast Wind's Assent application as required by CRMC's regulations.

2. Vessels performing survey work for a lessee should be required to maintain records of their daily operations, including the route they took each day. These records should be made available to the public.

Staff Response: Staff believe that it is both overly burdensome and unneeded for oversight.

3. To guarantee safety of fishing activities, any broken project parts or equipment that cannot be retrieved shall be buried at least 2 meters below the seafloor.

Staff Response: SouthCoast is already required to address leftover debris in a safe and effective way.

4. From November 1 through May 14, all vessels travel at 10 knots (18.5 kilometers per hour) or less when transiting to, from, or within the project area.

Staff Response: Staff suggest leaving such requirements for vessel speed to the United States Coast Guard as they have the governing authority and expertise for all vessels when transiting. A Navigation Safety Risk Assessment (NSRA) was prepared for the Project to inform navigation safety precautions for the Project (Attachment N to the Assent Application). The NSRA was conducted per USCG Navigation and Vessel Inspection guidance. Temporary safety zones, in consultation with the USCG, during construction activities will limit direct access to areas with construction activity for the safety of mariners and Project employees, but these areas will be limited spatially and temporally. The nature of these proposed zones is based on USCG regulations (33 C.F.R. 147), as well as precedents set by other recent offshore wind projects constructed in the United States. SouthCoast Wind will notify mariners via Local Notices to Mariners of the presence and location of partially installed structures. *See* Assent Application at 5-19.

5. Allow fishing vessels with static gear inside the project area during construction.

Staff Response: To the greatest extent practicable, this will be allowed.

6. Export cables shall not be installed during peak fishing or recreational boating season.

Staff Response: The timetable given for the SouthCoast Wind project already shows that the cables will not be installed during peak fishing or recreational boating season. Staff have also

added time of year restrictions to the stipulation package to in part avoid the peak fishing or recreational boating season

7. Cables should minimize the total cable footprint.

Staff Response: This is already in SouthCoast Wind application as required by CRMC's regulations. Where practicable, SCW will install the offshore export cables in a bundled configuration which would reduce the estimated seabed disturbance areas by approximately half.

8. Developer will monitor safety threats including radar disruption, ice shedding, vessel allisions and collisions, and impacts on search and rescue for the life of the project, and shall provide documentation of such monitoring results to CRMC upon request.

Staff Response: The survey measures needed have been added to the suggested stipulations.

9. The same conditions under construction shall be applied for decommissioning.

Staff Response: This is assumed along with a new submission to CRMC at the time of decommissioning.

10. Include funding set aside for unforeseen circumstances that may lead to early decommissioning.

Staff Response: This is addressed in Stipulation 30 of this staff report. Staff consider this an unnecessary request as decommission guaranties are already in place with the Bureau of Ocean Energy Management.

11. In the event of a leak of oil or other fluids, that information must be made available to the public immediately, and in particular the fishing industry to avoid inadvertent harvesting of product(s) that may be harmful to consume.

Staff Response: This is already addressed within the application as required by CRMC regulations.

12. A Good Neighbor Agreement be entered into with the coastal towns surrounding the Sakonnet River to establish a Sakonnet River Offshore Wind Community Fund for the purpose of supporting and promoting the mutual interest in renewable energy developments, combating the effects of global climate change, enhancing coastal resiliency, and protecting, restoring, and preserving cultural and historic resources.

Staff Response: SouthCoast Wind has already executed a Host Community Agreement with the Town of Portsmouth, a host town within which project components are to be located (e.g., two HDD landings and underground transmission infrastructure). Staff does not see the need for SouthCoast Wind to enter such agreements with Towns located outside of the proposed project area. The waters of the Sakonnet are State owned and regulated by RIDEM and CRMC.

d. RISA: Michael McGiveney, President of the Rhode Island Shellfisherman's Association (RISA) provided comments via email on December 26, 2024. The comments state that "RISA's primary concern is the negative impacts to documented shellfish resources that exist within the Sakonnet River and Mount Hope Bay from the proposed dredging, side casting of dredged materials, anchoring, and associated construction activity." and provided three specific conditions listed below.

First: Require SouthCoast Wind to conduct shellfish surveys within the cable corridor in both the upper Sakonnet River (GA4 and GA4-2) and Mount Hope Bay (GA17-2) up to and including the horizontal directional drilling exit pits and surrounding areas adjacent to Island Park Beach and the Montaup Country Club. Shellfish surveys shall be coordinated and in consultation with RIDEM Division of Marine Fisheries (DMF) to include real-time harvesting by commercial shellfishermen.

Second: Require SouthCoast Wind to pay all expenses for the transplant of shellfish from impacted areas of GA4 within the cable corridor to open waters of the Sakonnet River available for harvest, as may be deemed appropriate and necessary by RIDEM DMF. And, all shellfish removed from project impacted areas within closed waters (i.e., GA4-2 or GA17-2) shall be transplanted to a suitable shellfish management area within the East Bay (e.g., Bristol Harbor) for winter harvest, as deemed appropriate and necessary by RIDEM DMF.

Third: Require SouthCoast Wind to develop and establish a dedicated Rhode Island shellfish transplant fund to support future shellfish transplants within the waters of Narragansett Bay to mitigate for the SCW project's impact on the State's shellfish resources. Said transplant funds shall be developed in collaboration and coordination with RIDEM DMF and RISA, and shall be funded at a satisfactory level for a period of 20 years to be negotiated between SCW, RIDEM DMF and RISA.

Staff Response: SouthCoast has and continues to work with RI DEM Division of Marine Fisheries to conduct surveys and other monitoring activities. As well for any compensation and relocation efforts. The sea-to-shore and shore-to-sea transition will occur via HDD to avoid disturbance to nearshore productive shellfish beds to the extent practicable. RI DEM's 401 Water Quality Certification and Dredge Permit issued for the Project already requires that SouthCoast Wind conduct a shellfish survey prior to HDD construction activity to verify that shellfish density in the dredging area does not exceed densities outlined in RIDEM's "Guidance for Conducting Shellfish Surveys for Dredging Projects" document; if densities are found to exceed those levels, efforts will be made to relocate those animals to appropriate habitat in close coordination with RI DEM. *See* Assent Application at 3-41.

e. Seafreeze: Megan Lapp on behalf of Seafreeze Ltd submitted comments via email on January 14, 2025. These comments oppose the approval of the permit.

The reasons given were noncompliance with the requirement to have RI CRMC own RI Fisherman's Advisory Board (FAB) meet and review the application.

Staff Response: CRMC's Fishermen's Advisory Board was reestablished with new members and met with SouthCoast for their application review.

The lack of a suitable decommission bond and BOEM granting waver to several bonds that included past reviewed CRMC projects such as Vinyard Wind, South Fork and Revolution Wind. The comments specifically ask CRMC to not issue a permit until either "(1) RI CRMC can obtain written guarantee from the federal government that a financial assurance, i.e. decommissioning bond, will be required without waiver or deferral, or (2) the state acts to require such a decommissioning bond."

Staff Response: See Stipulation 30 of this staff report. CRMC's will work with our federal partners to ensure compliance with our regulations.

Lack of communication to the fishing industry and request that this be rectified by returning to the previous level of communication from past projects and "re-noticing the fishing industry, re-opening review- even at the state level to afford the industry time to provide project specific comments for the record- extending the current cabling comment period, and refraining from any further permitting until a standing FAB can be convened and decommissioning bonds assured."

Staff Response: All information received that is not confidential is accessible upon request to the CRMC during the public notice period. Considering that these comments were received during the noticed public comment period demonstrates that the fishing industry was able to engage and provide comments.

f. Alan Wheeler: Lessie M. Bourne Bookkeeper at the Law Office of Richard S. Humphrey submitted comments on behalf of Alan Wheeler via email and USPS on May 5, 2023. These comments concern impacts on his floating fish trap business, the Point Trap Company and Tallman & Mark, of which he is a majority stakeholder. The concerns were in relation to the impact on bottom disturbance and fish migration patterns due to the underwater cable installation. Alan Wheeler believes past mitigation funds were inadequate and based upon that this permit should be denied.

Staff Response: Staff has reviewed the impacts of bottom disturbance and fish migration patterns. In summary, these impacts are expected to be temporary with fish returning to the area

shortly after construction efforts have moved from the imminent area. For further details, please see the relevant sections of the report.

Staff along with the Fishermen's Advisory Board have reviewed the mitigation proposed by SouthCoast and found that to be sufficient. For further details, please see the relevant sections of the report.

g. Barbara Chapman & Helene van Beuren: Barbara Chapman, Green Ocean Trustee submitted comments via email on December 22, 2024 and Helen van Beuren, submitted the same comments via email on December 22, 2024. These comments urge a rejection of the application and noted the following concerns. The application violates the Federal Clean Water Act, the Federal National Environmental Protection Act. As well as The Rhode Island Coastal Resources Management Program, Rhode Island Water Quality Regulations, the Rhode Island Freshwater Wetlands Act and Rhode Island Fisheries Statutes.

Staff Response: SouthCoast Wind will be required to obtain all relevant permits before construction. To date, SouthCoast Wind has secured its Rhode Island Energy Facility Siting Board approval (issued on November 4, 2025), its CRMC Federal Consistency Determination (issued December 12, 2023), its Rhode Island Department of Environmental Management Section 401 Water Quality Certification and Marine Dredge Permit (issued March 14, 2024), and all its state and local permits in Massachusetts (in 2024). Upon reviewing SouthCoast Wind application staff recommends approval, please see the relevant section for details.

Potential impacts to the recreational activities in the Sakonnet River such as but not limited to fishing, boating, kayaking and local residents near the shore. Concerns from environmental impacts from the cable burial, by disturbing potential contamination from the displace material, EMF impacts to marine life, disturbances from cable maintenance, and leaks of Pipe-Type Cable Transmission Fluid (PTC).

Staff Response: Activities such as fishing, boating, kayaking won't be impacted by underwater cables. The cables will either be buried well beneath the seafloor or with additional secondary protection. This will mean that these cables are inaccessible to the general public. Notably, the cable is solid, not PTC. and thus, it will not contain any fluid that could leak. The cable isn't expected to deteriorate in such a way that it will impact water quality. During construction there may be an impact on water use but with the construction windows being off season and temporary such are not considered by staff to be significant.

Environmental impacts of EMF and displaced material are covered by staff in the relevant sections. SouthCoast Wind has applied for and received a 401 State Water Quality Certification and Dredge Permit from RI DEM. See staff's response to Save the Bay's sediment testing comment above describing pre-construction sediment sampling and testing required by RI DEM's Permit to ensure that potentially contaminated material displaced by construction will not impair water quality.

Maintenance will be rare and of minimal impact in the event it does. Events such as cable reburial, adding secondary cable protection or repair will have minor and temporary impacts.

h. Elizabeth Quattrocki Knight, M.D., Ph.D: Elizabeth Quattrocki Knight, M.D., Ph.D, President of Green Oceans submitted comments via email through Annette Rodriguez, Legal Assistant to Peter B. McGlynn, Robert W. Stetson and Daniel Lampke of Bernkopf Goodman on December 27, 2024 to request that the permit be denied or significantly revisited after further testing.

The comments offer the following as ways the proposed export cable installation violates CRMC regulations and principles. These sections are verbatim summations provided by Green Oceans for their complete comments.

Fisheries Impact: The export cables installation must be prohibited under the SAMP because it will result in significant adverse effects for multiple seasons on inshore juvenile Cod habitats, glacial moraine, and other important benthic habitats essential to marine organisms in and near Mount Hope Bay, the Sakonnet River, and Rhode Island Sound.

Staff Response: Under the Ocean SAMP Regulatory Standards (formerly § 860.2) §8.5.2(B)(4)(6) states that "The Council shall prohibit any other uses or activities that would result in significant long-term negative impacts Rhode Island's commercial or recreational fisheries. Long-term impacts are defined as those that affect more than one or two seasons." Seasons are defined as: Winter (December, January, February); Spring (March, April, May); Summer (June, July, August); Fall (September, October, November).

Staff does estimate that the Benthic Habitat will be fully recovered in 1 to 3 years. This estimate is longer than the 1 or 2 seasons, however, staff does not believe that the impacts from the export cables are considered significant. This is because there is a relatively small percentage of habitat affected and the availability of similar habitats in the surrounding area.

Juvenile Cod habitats are closer to shore than the impacts from the cable installation will reach. The closest patch of Submerged aquatic vegetation (SAV) is well outside the range of sediment disposition.

Glacial moraine makes up about 3.1% of the Export Cable Corridor and with mapping and cable micro-siting adjustments a large share can be avoided. When boulder relocations become necessary, they will be moved nearby to allow the area to retain its characteristics. Therefore, this amount of impact is not considered significant by Staff.

Net Effects: SouthCoast Wind has provided no evidence of any benefit of the export cables installation to Rhode Island's marine economy while the negative impacts are significant and potentially irreversible.

Staff Response: SouthCoast Wind's project will play a key role in helping Rhode Island meet its clean energy mandates by advancing Rhode Island's renewable energy goals and climate change policy. These policies are meant to reduce the risks to marine economy from impact caused by climate change.

Protected Areas: The export cables installation will impact glacial moraine and Cod spawning habitats in violation of the SAMP.

Staff Response: Juvenile Cod habitats are closer to shore than the impacts from the cable installation will reach. The closest patch of SAV is well outside the range of sediment disposition. The impacts on adult Atlantic Cod spawning habitats will be temporary in the construction phase and usable afterwards. When considered with a relatively small percentage of Cod habitat affected and the availability of similar habitats in the surrounding area. Staff doesn't believe that there will be impacts on the Cod population.

Glacial moraine makes up about 3.1% of the Export Cable Corridor and with mapping and cable micro-siting adjustments a large share can be avoided. When boulder relocations become necessary, they will be moved nearby to allow the area to retain its characteristics. Therefore, this amount of impact is not considered significant by Staff

Fishermen's Advisory Board (FAB): SouthCoast Wind inaccurately claims in their application materials to be consulting with the FAB; however, the FAB resigned *en masse* (emphasize Green Oceans) in 2023. The SAMP requires advice and consultation on any project of this size from the FAB which has not occurred.
Staff Response: CRMC's Fishermen's Advisory Board was reestablished in 2025 with new members and met several times with SouthCoast for their application review.

Prohibited Installation: The Red Book prohibits commercial and industrial structures, like export cables, and filling in Type 2 waters (i.e., the Sakonnet River), yet, SouthCoast Wind asks the CRMC to ignore this fact by pointing out that most of the cables will be buried in these waters.

Staff Response: Under CRMC regulations in 650-RICR-20-00-1 (Red Book), offshore wind projects including their export cables are considered "Energy-related activities" which is defined as "all operations and construction of structures involved in power generation and petroleum processing, ***transfer***, and storage." emphasis from staff. As such, export cable lines are considered to be "utility lines" which are allowed in Type 2 waters with a Category B application.

Alternatives: Although SouthCoast Wind was required to identify potential alternatives to the installation through glacial moraine and important benthic habitats and explain why, if at all, they are not feasible (without regard to financial considerations), SouthCoast Wind did not

consider utilizing a land-based route using overhead cable lines to eliminate the risk to the Sakonnet River ecosystem.

Staff Response: SouthCoast Wind submitted as part of their application Attachment B - Route Alternatives Assessment. In this assessment several onshore routes were evaluated and SouthCoast concluded that these route alternatives should dismissed due to a variety of engineering, construction, environmental, and other stakeholder concerns. As noted in this report, Staff reviewed the Route Alternatives Assessment and determined that the selected route meets the applicable standards listed above.

Cumulative Effects: SouthCoast Wind has failed to consider the project's cumulative impact on Rhode Island's coastal resources in conjunction with other already-approved offshore wind projects or even the other harmful components of the SouthCoast Wind project such as the open-loop cooling system.

Staff Response: This permit is only for activities occurring in Rhode Island State waters. The open-loop cooling system mentioned in this comment would be located many miles offshore in federal waters and, as such, is subject to federal jurisdiction and does not fall under the CRMC's jurisdiction. Assessments and monitoring are essential to determine whether there are any potential cumulative impacts resulting from the construction and operation of multiple wind energy projects. Section 3 of the Assent Application describes SCW's baseline surveys and evaluations, impacts assessment and proposed minimization, monitoring, and mitigation commitments. In addition, SouthCoast Wind included a Fisheries Monitoring Plan (Attachment P) to establish baseline fisheries conditions. Staff reviewed these proposed minimization, monitoring, and mitigation commitments and determined that they meet the applicable standards listed in this report.

i. Gary Mataronas: Gary Mataronas, President of the Sakonnet Point Fishermen's Association submitted comments via email on June 27, 2023 to reject the permit. These comments included a resolution from the Town of Little Compton titled "A Resolution in Opposition to Offshore Wind Turbines Sited Off Little Compton" and previse comments related to past offshore wind projects. These comments expressed concern about the impact of the offshore wind turbines on the sea life from the pile driving activities and navigational hazards.

Staff Response: Unlike previous offshore wind projects such as Revolution Wind, the offshore turbines do not fall under the agency's jurisdiction. The turbines are located in the BOEM designated lease area OCS-A 0521 which is outside of the established Geographic Location Description (GLD) Information (2011 and 2018). Outside the GLD the agency does not have review authority over those activities. As such, this permit is only for activities occurring in State waters.

j. John & Linda Hanos: John and Linda Hanos submitted comments via email on December 27, 2024 with concerns about the project. The comments included concerns about the impacts of submerged cables on their use of the Sakonnet River. Wind turbines failures include not being built strong enough to withstand hurricanes, turbines not being reliable in generating electricity, the noise from operation, disturbing the seabed, and EMF impacts.

Staff Response: Activities such as swimming, fishing and clamming won't be impacted by underwater cables. The cables will either be buried well beneath the seafloor or with additional secondary protection. This will mean that these cables are inaccessible to the general public.

Unlike previous offshore wind projects such as Revolution Wind, the offshore turbines do not fall under the agency's jurisdiction. The turbines are located in the BOEM designated lease area OCS-A 0521 which is outside of the established Geographic Location Description (GLD). As the agency does not have review authority over those activities, this permit is only for activities occurring in State waters.

Staff have reviewed concerns about disturbing the seabed, and EMF impacts and addressed them in the relevant sections of the report.

k. John Travassos: John Travassos submitted comments via email on January 5, 2025, urging the CRMC to reject the application. The comments included concerns about the cumulative impacts of the disturbances and destruction of the marine environment. Also, the loss of the natural environment from industrial use.
Staff Response: Staff have reviewed these concerns and addressed them in the relevant section of the report. With the proper burial of the cable, there is little impact on the natural environment expected during the life of the project.

l. Sandra Craig: Sandra Craig submitted comments via two emails received on December 10, 2024, and December 24, 2024, urging the denial of the permit. The comments included concerns about the impacts from the export power cables from "Resuspension of toxic matter & PFAS in dredged up sediment", lack of testing on sediment, and Beach Closures from pollution. Also, the cumulative impacts on water quality from all parts of the project, including but limited to anti-corrosive coating and "Leading edge erosion".

Staff Response: Staff have reviewed concerns about sediment testing for contamination required by the 401 WQC and Dredge Permit from RIDEM and cumulative impacts and addressed them in the relevant sections of the report. The cable isn't expected to deteriorate in such a way that it will impact water quality.

Sandra Craig also cited concerns about insufficient burial depth of the cable. Claiming that the proposed target of 6 feet will not be enough to "prevent **movement of the cables themselves**

which could cause damage or breakage." (emphasize Sandra Craig) and no test has been done to see how much the seabed shifts.

Staff Response: Staff analysis has shown that a 6-foot burial depth is sufficient to avoid exposure.

Comments also contained concerns about insufficient cable inspection and monitoring plans that would be proactively preventing damage to the cables and in turn protecting the environment.

Staff Response: Staff recommend stipulations concerning cable surveys and monitoring plans are sufficient to address these concerns.

Comments also contained concerns about EMF impacts in part from citing from NOAA's Technical Memorandum NMFS-NE-291 "Fisheries and Offshore Wind Interactions: Synthesis of Science" published March 2023. Also, concerns from insufficient testing and continuing EMF monitoring.

Staff Response: Please see the EMF section and Stipulations 21 and 22.

Questions about the RI DEM Fisheries monitoring plan such as if the plan has been implemented, if so when it started and where can the data be seen.

Staff Response: SouthCoast has submitted and has had their Fisheries monitoring plan accepted by RI DEM.

Comments also contained concerns about sea temperature rising due to offshore substation platform (OSP) discharge and heat emission from subsea transmission cables. Potential Plankton and Algal Blooms and the resulting deoxygenation from the cables heat.

Staff Response: The OSP discharge is both out of Rhode Island waters and out of CRMC geographic location description and therefore not subject to this review. SouthCoast Wind will obtain a National Pollutant Discharge Elimination System (NPDES) permit for the OSP from the Environmental Protection Agency as the OSP is located in federal waters.

m. Debrah Vine-Smith: Debrah Vine-Smith submitted comments via email on November 16, 2024. The comments contained concerns about impacts from EMF, heat from the cable affecting benthic organisms, fish reduction, removal of beach sand, increase of beach erosion, and including the Host Community Agreement with the Town of Portsmouth.

Staff Response: Concerns about EMF, Benthic Species, and Fish impacts are covered by their respective Section. SouthCoast Wind is utilizing HDD to access the shore with proper installation; this method shouldn't cause or contribute to beach erosion. Staff does not have any comment on the Host Community Agreement with the Town of Portsmouth as it is outside the scope of this review.

Appendix A

Submerged Lands Lease Recommendation to the Rhode Island General Assembly

State of Rhode Island
Coastal Resources Management Council
Oliver H. Stedman Government Center
4808 Tower Hill Road, Suite 116
Wakefield, RI 02879-1900

Phone (401) 783-3370
Fax (401) 783-3767

June 9, 2026

RE: RI CRMC Recommendation to the Rhode Island General Assembly for a Submerged Lands Lease for the SouthCoast Wind Project

SouthCoast Wind, LLC has requested a Submerged Lands License for Renewable Energy Development that is larger than 25 acres in support of the Project's offshore power cables bundle. Requests for a submerged lands lease (SLL) 25 acres or larger "requires direct enactment of the general assembly by legislative action."[1] The SCW offshore power cables are not transatlantic cables and would extend from the project's lease area approximately 51 nautical miles southeast of the Rhode Island coast into Rhode Island state waters. The requested SLL area comprises two separate portions of Rhode Island's submerged lands. Portion one travels from the mean high-water (MHW) mark at Portsmouth, Rhode Island seaward in the Sakonnet River to the limit of the Rhode Island territorial waters; portion two travels from the MHW mark on the Mount Hope Bay side of Portsmouth to the R.I./Mass. state boundary in the Bay. The total length of the SLL area is approximately 20.4 miles (32.8 km), will be a maximum of 2,300 feet (700 m) wide, and will result in a total lease area of 4,135 acres in Rhode Island state waters. The requested SLL would be sufficient for cable bundles associated with SCW Project 1 and Project 2. Project cables, when not bundled, will run parallel with a targeted spacing of 164 feet between cables. SouthCoast Wind has requested the entire corridor area as a requirement to support necessary operations and maintenance activities associated with the export cables.

The SLL request would entail granting SCW the rights to the installation, construction, reconstruction, repair, replacement, maintenance, operation, uses inspection, patrol, decommissioning and removal of the export cables in accordance with relevant CRMC regulations. SCW will be limited only to those activities related to the export cable and may only conduct those activities in accordance with the assent, subject to stipulations and the relevant CRMC regulations. The lease will prevent additional submerged cables or burials of a similar nature from being within the lease zone unless otherwise approved of by legislative action.

Under Rhode Island General Laws § 46-23-1(f)(2) "The legislature hereby declares that, in light of the unique size, scope, and overall potential impact upon the environment of large-scale filling projects involving twenty-five (25) acres or more, any lease of tidal lands, or any

[1] *See* R.I. Gen. Laws § 46-23-1(f)(2).

license to use those lands, is subject to approval, disapproval, or conditional approval by the direct enactment of the general assembly by legislative action."

CRMC staff have determined that the SouthCoast Wind project meets the criteria established by R.I. Gen. Laws § 46-23-1(f)(2). As such, the sole authority to issue a SLL for the Project rests with the Legislature. Staff shall work for the general assembly in an advisory capacity and make recommendations on the request for a SLL. The required SLL will not prohibit the council from issuing a decision. A stipulation for requiring a SLL has been added to the report to address this issue.

Appendix B

SouthCoast Wind Project 1

Fisheries Mitigation Proposal for the Category B Assent

SOUTHCOAST WIND PROJECT 1

Fisheries Mitigation Proposal for the Category B Assent

RHODE ISLAND COASTAL RESOURCES MANAGEMENT COUNCIL

NON-BINDING TERM SHEET

May 15, 2026

SouthCoast Wind Energy LLC ("SouthCoast Wind") is in the process of developing the first project ("Project 1") on the outer continental shelf lease area OCS-A 0521 (the "Lease Area") located approximately 30 miles south of Martha's Vineyard and 20 miles south of Nantucket. SouthCoast Wind has committed to numerous measures to avoid, minimize, and mitigate the potential impacts to fisheries due to the development of the portion of Project 1 that will be located in Rhode Island state waters. Development plans for Project 1 include the use of an export cable corridor ("ECC") that will bring generated power from the Lease Area to shore, referred to as the "Brayton Point ECC." The Brayton Point ECC will travel through Rhode Island state waters, including the Rhode Island Sound, the Sakonnet River, and part of Mount Hope Bay, before entering Massachusetts waters and making landfall in Somerset, Massachusetts. The Brayton Point ECC overlaps with approximately 20 miles of Rhode Island state waters.

This compensatory mitigation proposal would provide financial compensation to Rhode Island commercial, for-hire charter, and recreational fishing operations that may experience economic loss resulting from the construction, operation, and decommissioning of the Brayton Point ECC located in Rhode Island state waters. This mitigation proposal has the following components:

(1) Funding to compensate for economic losses that are directly attributable to installation of export cables within the Brayton Point ECC;

(2) Funding to support recreational fishermen more generally; and

(3) Funding to support a scientific 'trawlability' study that will inform fishermen's decision-making around whether and how to fish mobile gear in close proximity to secondary cable protection.

(1) Direct Compensation Fund:

SouthCoast Wind or its designated subsidiary will provide $754,906 (2024 dollars) in funds paid to the Rhode Island Fishermen's Future Viability Trust (the "Trust") as a direct financial mitigation to affected Rhode Island commercial and for-hire charter fishermen operating in the portion of the Brayton Point ECC located in Rhode Island state waters. This amount will be subject to a Consumer Price Index (CPI-U) adjustment that accounts for inflation between present dollars and projected years that

Project 1 will reach financial close. The CPI-U escalator runs from January 1, 2025 to the date of Project 1 financial close, capped at the value corresponding to January 1, 2031. The CPI-U escalator assumes adjustments of 2.7% inflation for 2025, 3.3% inflation for 2026, and 2.5% inflation for 2027 – 2031 (based on historic average).

If Project 1 financial close occurs on or before December 31, 2030, the actual CPI-U-adjusted value at that date applies. If financial close occurs on or after January 1, 2031, the capped payment of $884,014 applies regardless of subsequent delay. If the actual CPI-U adjustment in any year prior to 2031 exceeds this amount, the $884,014 cap applies. The schedule of payment amounts for direct compensation to commercial and for-hire fishermen, the Recreational Fishing Support Fund (see Section 2), and the Trawlability Study (see Section 3), depending on year of financial close are provided in Table 1. The Trawlability Study amounts are fixed regardless of year of financial close (i.e., a CPI-U adjustment is not applied).

Table 1 – Compensation payment amount for Project 1 by financial close year.

Financial Close Year	Project 1 Direct Compensation (Commercial and For-Hire)	Recreational Fishing Support Fund	Trawlability Study	Total Obligation
2027	$800,873	$71,610	$60,000	$932,483
2028	$820,895	$73,400	$60,000	$954,295
2029	$841,417	$75,235	$60,000	$976,653
2030	$862,453	$77,116	$60,000	$999,569
2031	$884,014	$79,044	$60,000	$1,023,058

(a) This funding amount was based on an economic impact assessment for commercial and for-hire fishermen, which was then later evaluated and refined by a separate third-party subject matter expert. The impact assessment used the best available data, which were adjusted for lobster, Jonah crab, whelk, and mantis shrimp, and included multipliers for upstream and downstream effects.

(b) The funds will be paid to the Trust within 60 days of Project 1 achieving financial close.

(c) The funds will be paid to the Trust, subject to an agreement by the Trust to include, inter alia, a release of SouthCoast Wind from any and all liability arising in connection with the administration and use of the funds. The Trust was established in 2021 to support Rhode Island fishermen's continued ability to fish in and around offshore wind projects. The Trust shall utilize a third-party administrator retained by the Trust,

which, together with designated members of the Trust, will determine the methods and means by which to process the claims received from commercial and for-hire charter fishing operations, and distribute compensation for direct economic losses arising from the construction, operation, and decommissioning of each Project.

(d) The claims process established by the Trust shall include obtaining a valid and enforceable release of SouthCoast Wind for past and future claims or liabilities, which release shall be in a form acceptable to SouthCoast Wind. Any and all claims for compensatory losses must be directed to and paid by the Trust, and SouthCoast Wind will have no liability for processing or paying such claims.

(e) The Trust shall also be required to provide SouthCoast Wind with an annual report of claims paid to enable SouthCoast Wind to provide such information to BOEM and/or CRMC, or other state, federal, or local government agencies or courts, as may be required.

(f) As part of the claims process the Trust may evaluate the history of paid claims and make reasonable projections regarding future claims. If the Trust determines that excess funds exist to pay anticipated future claims, the Trust may redirect the funds for uses other than the payment of direct economic losses, provided such alternative uses are consistent with the stated purpose of the Trust.

(g) Notwithstanding paragraph (d), SouthCoast Wind has maintained and will continue to maintain for the duration of the SouthCoast Wind Project a gear loss program separate from the Trust to compensate fishermen for any loss or damage to fishing gear directly attributable to SouthCoast Wind's construction, operations, and decommissioning activities.

(h) The parties acknowledge that recreational fishermen are not eligible to claim direct compensation because data availability and resolution are not sufficient to estimate the potential financial impacts (if any) to recreational fishermen within the Project area. Furthermore, recreational fishermen are not subject to the same reporting requirements as commercial and for-hire charter fishermen, making it difficult to integrate recreational fishermen into a direct compensation claims program.

(2) Recreational Fishing Support Fund:

a) SouthCoast Wind will also provide a total of $67,500 (2024 dollars) to support Rhode Island recreational fishermen more generally to be paid to the Trust. This amount will be subject to a Consumer Price Index (CPI-U) adjustment that accounts for inflation between present dollars and projected years that Project 1 will reach financial close. The CPI-U escalator runs from January 1, 2025 to the date of Project 1 financial close, capped at the value corresponding to January 1, 2031. The CPI-U escalator assumes adjustments of 2.7% inflation for 2025, 3.3% inflation for 2026, and 2.5% inflation for 2027 – 2031 (based on historic average). If Project 1 financial close occurs on or before December 31, 2030, the actual CPI-U-adjusted value at that date applies. If financial

close occurs on or after January 1, 2031, the capped payment of $79,044 applies regardless of subsequent delay. If the actual CPI-U adjustment in any year prior to 2031 exceeds this amount, the $79,044 cap applies.

b) There are no restrictions on the use of these support funds, provided they focus on generally supporting the recreational fleet and fulfill the purpose of the Trust. Additional potential uses of the funds include safety training programs, research initiatives, and a navigational/safety equipment support program (e.g., radar, AIS, survival suites, etc.). The funds could also be used to investigate how recreational fishing is impacted by the development of offshore wind, if so elected by the Trust.

(3) Cable Protection Trawlability Study

SouthCoast Wind shall commission and fund a trawlability assessment of any secondary cable protection installed in Rhode Island state waters in connection with Project 1, including but not limited to articulating cable mattresses, rock placement, or concrete blankets, within 12 months of the commencement of Project 1 commercial operations. The study shall evaluate whether mobile fishing gear can safely maneuver over secondary protection installations in the affected areas of Mount Hope Bay and the Sakonnet River corridor. The study will work directly with fisheries scientists and mobile gear fishermen that are typically active in the vicinity of the SouthCoast Wind ECC in RI state waters. The goal of the study will be to best inform fishermen's decision-making around whether and how to fish in close proximity of secondary cable protection. The study will leverage past and on-going work focused on evaluating the hazard of trawling over cable protection mattresses[1]. The funding amount will be capped at $60,000. Following completion and review of the study, the findings of the study will be presented to CRMC and interested members of the fishing community.

Conditions Precedent to Payment of Funds

a) The Rhode Island CRMC shall have granted approval of SouthCoast Wind's Category B Assent permit application.

b) SouthCoast Wind Project 1 shall have received, respectively, all final federal, state and local permits, authorizations, concurrences and approvals necessary to construct and operate the Project.

c) SouthCoast Wind Project 1 must achieve financial close.

[1] For example, "Evaluating the Hazard of Trawling Over Cable Protection Mattresses" by the Commercial Fisheries Research Foundation, awarded by the Massachusetts Fisheries Innovation Fund in late 2025 at the amount of $60,768 (see slide 12: https://www.mass.gov/doc/fisheries-working-group-on-offshore-wind-energy-presentations-12-12-25/download) .

Binding Nature of this Term Sheet

The provisions of this Term Sheet are for negotiation purposes only and do not constitute a binding offer or agreement. If agreed, the included terms may be incorporated into any such definitive agreements for final approval.

SOUTHCOAST WIND ENERGY LLC

DocuSigned by:

By: Michael Brown
B2F31605ED134D3...

Name: Michael Brown

Title: Chief Executive Officer

June 2, 2026 | 5:34 PM EDT

RHODE ISLAND COASTAL RESOURCES MANAGEMENT COUNCIL

By: Jeffrey M. Willis

Name: Jeffrey M. Willis

Title: Executive Director, RI CRMC

Initial

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Appendix C

Fisheries Reports

SOUTHCOAST WIND

Baseline Value of Commercial Fisheries Landings and For-Hire Revenue from the SouthCoast Wind Export Cable Corridor in Rhode Island State Waters

Document Number	SC01-GEN-PRT-RPT-0008
Document Revision	A
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Disclosure	For use by South Coast Wind and Authorized Third Parties

Baseline Value of Commercial Fisheries Landings and For-Hire Revenue from the SouthCoast Wind Export Cable Corridor in Rhode Island State Waters

Hauke Kite-Powell, Di Jin, and Michael Weir
Marine Policy Center
Woods Hole Oceanographic Institution

10 October 2024

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List of Abbreviations

COP – Construction and Operations Plan

ECC – Export Cable Corridor

ECR – Export Cable Route

ECRA – Export Cable Route Area

GDP – Gross Domestic Product

MA DMF – Massachusetts Division of Marine Fisheries

NEMFIS – Northeast Marine Fisheries Information System

NMFS – National Marine Fisheries Service

NOAA – National Oceanographic and Atmospheric Administration

PPI – Producer Price Index

RICRMC – Rhode Island Coastal Resources Management Council

RIDEM – Rhode Island Department of Environmental Management

SBRM – Standardized Bycatch Reporting Methodology

VMS – Vessel Monitoring System

VTR – Vessel Trip Report

WLA – Wind Lease Area

Summary

Based on Rhode Island Department of Environmental Management data from 2008 to 2021, we estimate the average annual value of commercial landings from Rhode Island State waters in the vicinity of the SouthCoast Wind Brayton Point Export Cable Route to be $58,600 (2024$) per km^2. Including indirect and induced effects, these landings generate average annual economic impacts of $112,900 per km^2 in Rhode Island. The Brayton Point Export Cable Area (defined here as a 180 m wide lane surround the export cable) has a footprint of about 6.1 km^2 in Rhode Island state waters. We estimate the average annual economic impact from landings from the ECA in Rhode Island waters to be between $358,000 (2024$), and $689,000 per year when accounting for indirect and induced effects.

A survey of Rhode Island and Massachusetts-based charter fishing suggests that the annual revenue to Rhode Island-based charter fishing vessels from fishing in the RI state waters portions of the Brayton Point Export Cable Route is between $10,000 and $29,000 (2024$). Including indirect and induced effects, this results in total economic impact between $16,000 and $48,000 per year.

Introduction

This report estimates the level of pre-development fishing operations intersecting with, and landings and landed value from, the SouthCoast Wind Brayton Point Export Cable Route (Figure 1) associated with landings and revenue generated in Rhode Island state waters.

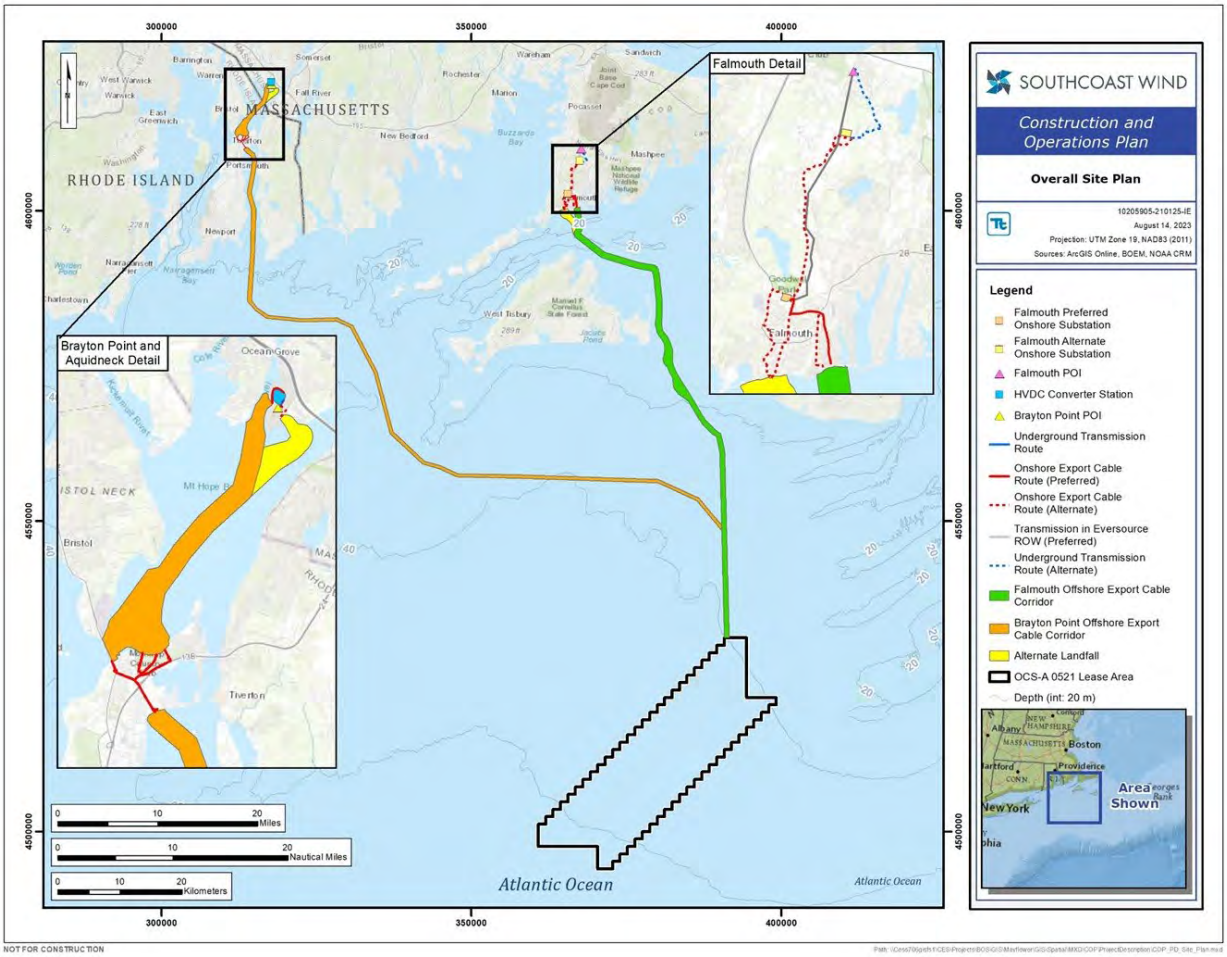

Figure 1. SouthCoast Wind Lease Area and export cable routes. Source: SouthCoast Wind.

The Wind Lease Area (WLA) for SouthCoast Wind (OCS-A 0521) is outside of Rhode Island state waters and the 2011 and 2018 Rhode Island Geographic Location Description areas (GLDs). The WLA lies in federal waters, roughly 25 nautical miles south of Nantucket and 51 nautical miles southeast of the Rhode Island coast, and has a footprint of 516 km^2. The Export Cable Corridor (ECC) to Brayton Point is 156 km in length, and runs from the northern edge of the WLA first to the north and west across Rhode Island Sound, then up the Sakonnet River to its landing location at Brayton Point in Somerset, MA. A second Export Cable Corridor is included in SouthCoast Wind's federal permits as a variant option and runs from the WLA to Falmouth, MA. The Falmouth variant option is only located in federal and Massachusetts state waters and therefore is not considered further in this assessment. SouthCoast

Wind plans to develop the WLA in two phases (Project 1 and Project 2), each with its own export cable bundle. SouthCoast Wind's preferred approach is to use the Brayton Point ECC for both Project 1 and Project 2. The focus of this assessment is on the portion of the Brayton Point ECC that overlaps with RI State Waters, which predominately lies within the Sakonnet River.

The Brayton Point ECC is 700 m wide and represents the corridor within which the cables will be located; it has no physical significance in the context of fisheries impacts. Only portions of the narrow, 180 m wide Export Cabe Area (ECA) centered on the export cables themselves may be disturbed in the process of burying and decommissioning the cables.

The state waters portion of the Brayton Point ECC lies entirely in NOAA Northeast Marine Fisheries Information System (NEMFIS) Statistical Reporting Area 539 (Figure 2). In the Sakonnet River, the Brayton Point ECC transects portions of Rhode Island Shellfish Harvest Areas 4A, 4B, 4C, 4D, and 17 (Figure 3).

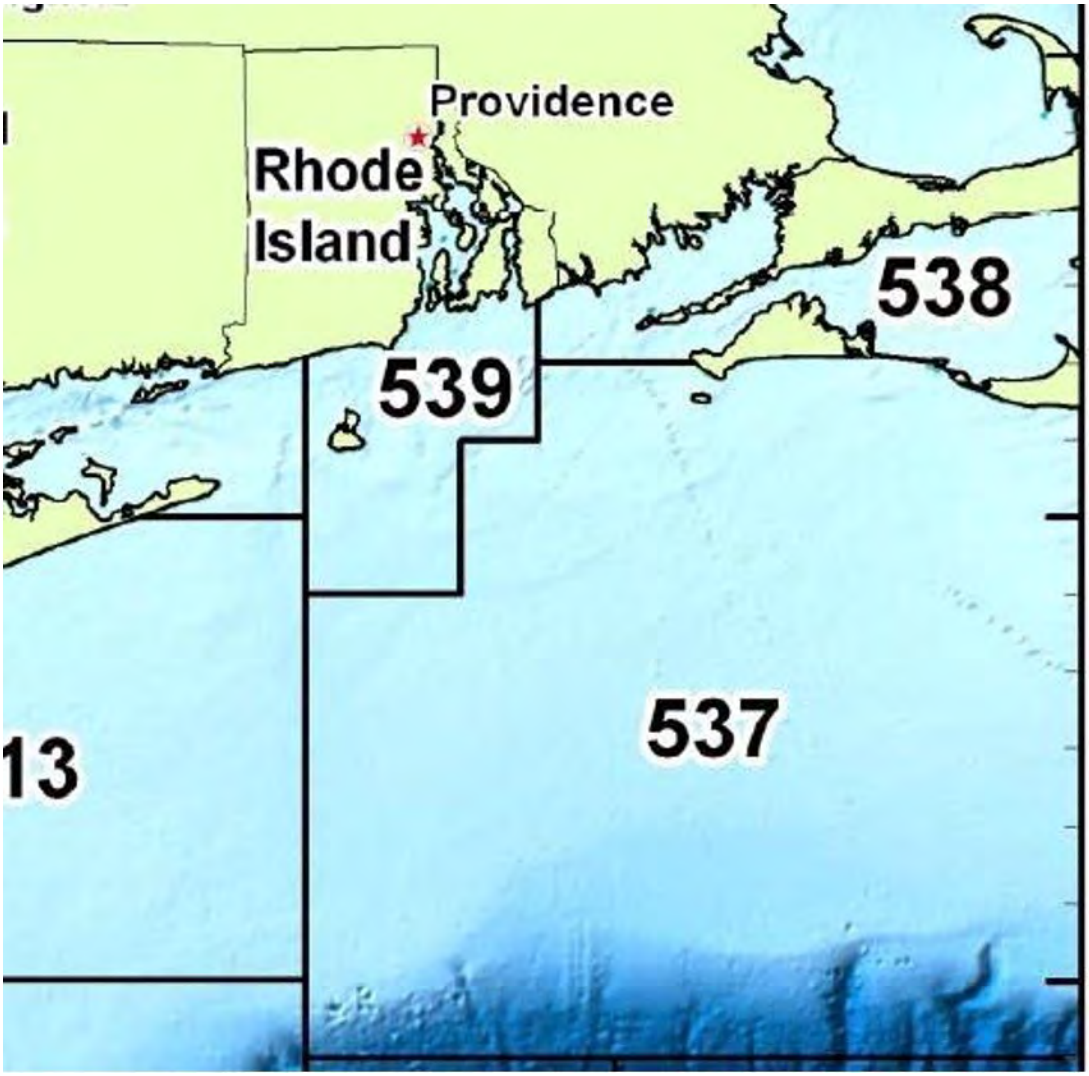

Figure 2. NOAA Fisheries Statistical Reporting Areas. Source: ACCSP (2021).

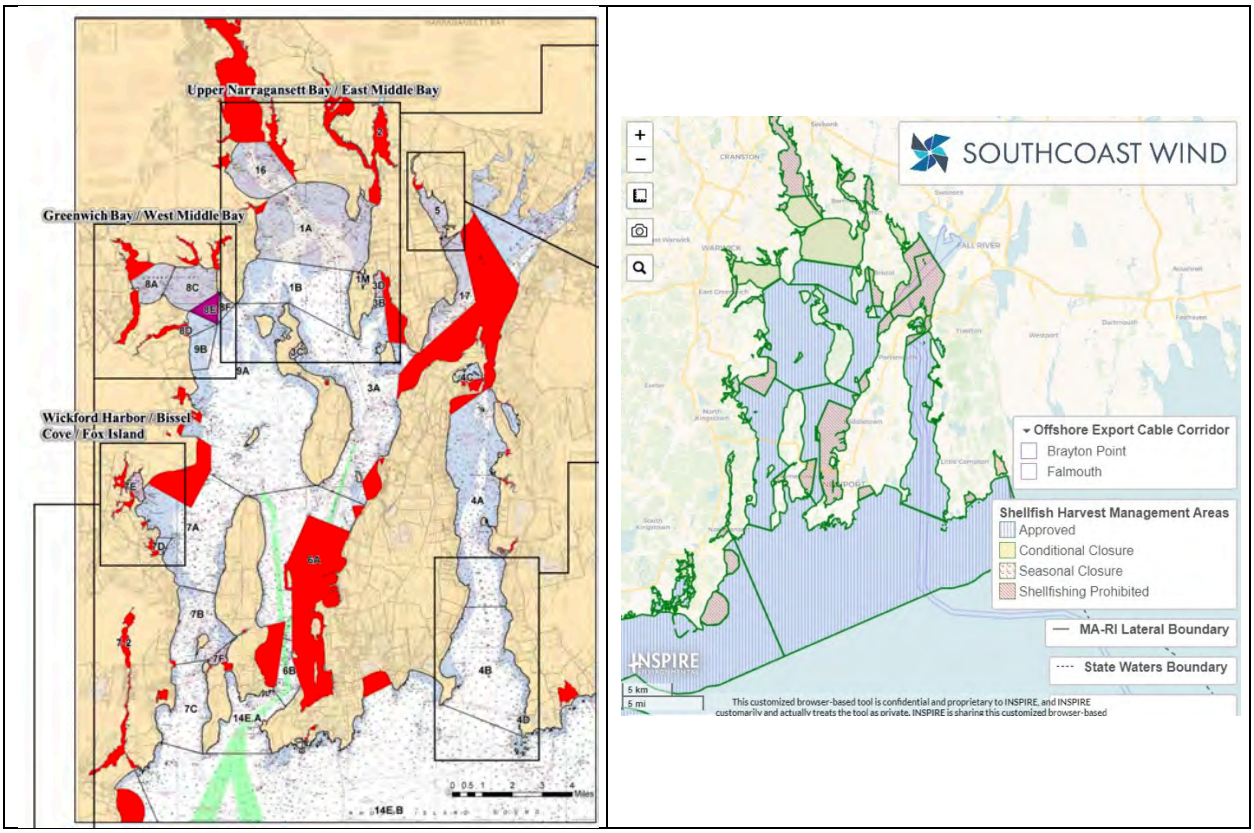

Figure 3. Rhode Island Shellfish Harvest Areas and SouthCoast Wind ECC. Shellfishing is prohibited in areas shown in red. Sources: RIDEM, SouthCoast Wind.

Table 1 shows the approximate length and area of the relevant features for the SouthCoast Wind Project. In the sections that follow, fishery landings and values for the Export Cable Route are estimated and reported for the 180 m wide Export Cable Area, as defined above.

Table 1. SouthCoast Wind area parameters

Wind Lease Area (WLA) footprint (km^2)	516
Brayton Point Export Cable Route length (km)	148
of which in Rhode Island state waters (km)	34
Footprint of 180 m Export Cable Area in RI state waters (km^2)	6.1

Methodology

There are two sources of data on commercial fisheries landings from the SouthCoast Wind project areas. The first is a dataset on landings and landed value from NOAA's National Marine Fisheries Service. This dataset uses modeled representations of federal Vessel Trip Report (VTR) and clam logbook fishing trip data to produce an accurate spatial allocation of landings from each fishing trip (DePiper 2014; Benjamin *et al.* 2018). It is used among others by BOEM (2023) for its assessment of fisheries landings from the SouthCoast WLA, and represents the most comprehensive source of commercial fisheries data for federal waters. This dataset does not include landings associated with state permits, and therefore underestimates the landings and landed value from the state waters portion of the ECA.

To address this issue, we use a second dataset on landings from the Rhode Island Department of Environmental Management (RIDEM) on fisheries landings from NOAA Fisheries Statistical Reporting Area 539 (Figure 2) for the years 2008 to 2021. The RIDEM data are compiled as the total yearly pounds landed, by species. We use data from NOAA on prices by species to estimate the landed value associated with the RIDEM reported landings. RIDEM also reports shellfish harvest by harvest areas within Rhode Island state waters (Figure 3); we use this information to supplement the Area 539 landings data.

Annual landings reported in each of these datasets vary from year to year; we use the average landings and landed value from 2008 to 2021 as indicative of what the area may yield in the future.

Baseline commercial fishery landings and values

The RIDEM Area 539 commercial landings quantity statistics come in two separate data sets. The first set includes mainly finfish species measured in "hail weight" pounds, and the second includes shellfish species measured in other units: quahogs in "number of clams," and softshell clams and oysters in "total pounds." We assume RIDEM "hail weight" and "total pounds" are consistent with NMFS landed weight and live weight designations, respectively. We convert the number of clams into live pounds using a conversion factor of 5.562 clams per pound.

The Area 539 data are based on Vessel Trip Reports (VTRs) and state logbook entries. RIDEM does not currently provide revenue or price data associated with these landings, because neither VTRs nor state logbooks include price data. We use the price by species data from NOAA (described below) to estimate the revenues for landings from Area 539. For the three shellfish species measured in live weight, we use annual prices (in $/live pound) reported by the Maine Department of Marine Resources[1] because this is the most detailed and consistent such dataset for the Northeast.

Some fraction of lobster and Jonah crab landings are sold directly from boats at dockside, at a price above that reported in the dealer information on which the NOAA values above are based. Neither the fraction of landings sold in this way nor the price premium is known exactly. Based on information provided by a group of Rhode Island fishermen (pers. comm., 24 Nov. 2020), we estimate that a 15% premium on the landed value adequately captures this dockside sales effect for Rhode Island landings.

[1] https://www.maine.gov/dmr/fisheries/commercial/landings-program/historical-data.html

The resulting average annual landings and estimated landed value for selected species from Area 539 during the period from 2008 to 2021 are shown in Table 2. See Table A1 in the appendix for complete list.

Table 2: Baseline average annual landings and landed value (2008-2021) for Area 539, selected species, estimated from data provided by RIDEM, NOAA.

Species/group	**Landings** (million lbs/year)	**Value** (2024$ millions/year)
Skates, Rajidae (Family)	4.77	12.45
Flounder, Summer	0.63	2.99
Lobster, American	0.31	2.30
Skate, Little	0.74	1.95
Whelk, Channeled	0.20	1.90
Squid, Longfin Loligo	0.86	1.46
Scup	1.03	0.87
Goosefish	0.34	0.87
Scallop, Sea	0.05	0.71
Bass, Black Sea	0.11	0.58
Bass, Striped	0.09	0.51
Herring, Sea, Atlantic	2.82	0.49
Flounder, Winter	0.16	0.49
Hake, Silver	0.66	0.43
Flounder, Yellowtail	0.15	0.37
Others… (see Appendix)		
Whelk, Knobbed	0.01	0.01

The values in Table 2 likely understate landings and landed value for some species, because of confidentiality requirements (such as the "rule of three") prevent RIDEM from disclosing data that could allow a specific harvester's landings to be identified. As a result, some landings are excluded from the species-level data we received from RIDEM. We are not able to adjust for this with species-specific factors, but we can make approximate adjustments based on annual totals, as follows. Table 3 shows the total annual value for all Area 539 landings from the "finfish" dataset in column 2, the sum of landings reported at the species level in column 3, and the fraction of landings (by weight) not captured in the species-level data in column 4. The final column shows our estimate of the landed value for the Area 539 data, adjusting for the fraction not captured at the species level, and for dockside sales of lobster and Jonah crab as discussed above. All values are shown in 2024 dollars (see discussion below on inter-annual price adjustments). The resulting average annual landed value from 2008 to 2021 for all species in the Area 539 "finfish" dataset is $42.7 million (2024$).

Table 3: Annual value and landings of commercial fisheries from Area 539. Source: RIDEM.

Year	Total landings* (million lbs)	Sum of landings by species** (million lbs)	Percentage of total landings not captured in species-level data	Value*** (2024$ millions)
2008	18.0	14.8	18%	39.2
2009	23.7	21.6	9%	29.8
2010	18.1	13.4	26%	29.8
2011	28.0	19.9	29%	49.8
2012	34.7	20.1	42%	71.1
2013	39.6	18.5	53%	63.6
2014	32.7	24.8	24%	48.6
2015	27.4	18.7	32%	41.4
2016	24.8	14.9	40%	48.0
2017	19.5	11.0	43%	38.4
2018	18.0	12.4	31%	46.6
2019	18.0	13.2	26%	36.9
2020	16.1	14.0	13%	24.8
2021	17.3	11.8	31%	29.8
avg. 2008-21	**24.0**	**16.4**	**30%**	**42.7**

* RIDEM reported hail weight. We assume RIDEM hail weight = NMFS landed weight.

** Sum of RIDEM reported weight by species. Species-level data do not include landings subject to the rule-of-three restrictions.

*** Price by species data is from NMFS. Based on RIDEM species-level landings, adjusted for fraction not captured in this data set (column 4) due to confidentiality requirements.

As noted above, RIDEM provides a separate dataset for shellfish landings from Area 539. Annual value estimates for these landings are shown in Table 4. According to RIDEM (pers. comm. Sept. 2024), their reported landings in this dataset understate the total landings on average by 0.5% due to confidentiality rules. We therefore adjust the average annual landings from 2008 to 2021 by 0.5% to obtain an average annual value of $7.23 million (2024$). Because we have more location-specific information about shellfish harvest for the state waters areas in the immediate vicinity of the Brayton Point Export Cable Route, we do not use the Area 539 data on shellfish in our calculations, but include the information here for reference.

Table 5 shows annual landings reported by RIDEM, and our estimates of annual value, for shellfish from Rhode Island Shellfish Harvest Areas 4A, 4B, 4C, 4D, and 17 – the Harvest Areas intersecting with the Brayton Point Export Cable Route. According to RIDEM (pers. comm. Sept. 2024), their reported landings understate the total landings on average by 14% due to confidentiality rules. We therefore adjust the average annual landings for these Harvest Areas from 2008 to 2021 by 14% to obtain an average annual value of $2.39 million (2024$).

Table 4: Annual value and quantify of "other commercial shellfish" from Area 539. Source: RIDEM, NMFS.

Year	Landings* (million lbs)	Value** (2024$ millions)
2008	4.11	5.89
2009	3.47	4.52
2010	4.21	5.14
2011	4.70	6.39
2012	6.47	9.10
2013	5.69	7.94
2014	5.80	8.50
2015	5.16	9.19
2016	5.06	9.37
2017	4.13	7.60
2018	3.82	7.58
2019	3.71	8.10
2020	2.61	4.71
2021	2.59	6.72
average	**4.39**	**7.20**
adjusted +0.5%* **	**4.42**	**7.23**

* Species include "Clam, Quahog, Northern," "Soft-Shell Clam," and "Oyster" in the RIDEM data.
** Price by species data is from NMFS.
*** See text above for details on 0.5% adjustment.

We build our estimate of total (all species) landed value from the Rhode Island state waters along the Brayton Point Export Cable Route from the combined values from the Area 539 "mainly finfish" dataset (Table 3) and the RI Harvest Area shellfish dataset (Table 5). The only overlap between the two is whelks, which contribute an estimated $2.48 million per year in Area 539 ($1.91 million plus 30% to account for loss of capture due to confidentiality). Subtracting this from the annual average from Table 3, and using the Area 539 footprint of 2,550 km^2, we obtain an average landed value density of $15,800/$km^2$/year for the Area 539 "finfish" dataset. The footprint of RI Harvest Areas 4A/B/C/D and 17 is 55.8 km^2, so average landed value density for those data is $42,800. We therefore estimate the total landed value density along the Export Cable Route in Rhode Island state waters to be $58,600/$km^2$/year.

Applying the per unit area value estimated above to the Rhode Island state waters footprint of the Brayton Point ECA (6.1 km^2) results in annual landed value for Rhode Island landings from the state waters portion of the 180 m Brayton Point ECA of $358,000 (2024$).

Table 5: Annual value and quantify of "other commercial shellfish" from RI Shellfish Harvest Areas 4A, 4B, 4C, 4D, and 17. Source: RIDEM, NMFS.

Year	Landings* (million lbs)	Value** (2024$ millions)
2008	0.48	0.64
2009	0.49	0.69
2010	0.50	0.56
2011	1.13	2.62
2012	1.05	2.70
2013	1.03	1.93
2014	0.89	1.71
2015	0.68	1.60
2016	0.82	3.44
2017	0.92	3.05
2018	1.02	3.66
2019	0.99	3.00
2020	0.77	2.16
2021	0.24	1.54
average	**0.79**	**2.09**
adjusted +14%* **	**0.90**	**2.39**

* Species include "Clam, Quahog, Northern", "Soft-Shell Clam", "Oyster", " Whelk, Channeled", and "Whelk, Knobbed" in the RIDEM data.

** Price by species data is from NMFS.

*** See text above for details on 14% adjustment.

Inter-annual price adjustments

We use the Bureau of Labor Statistics' Producer Price Index (PPI) for "unprocessed and prepared seafood"[2] to convert ex-vessel value of fish landings, because this index is specifically for the fishery sector. PPI is a family of indexes that measures the average change over time in selling prices received by domestic producers of goods and services; they measure price change from the perspective of the seller. In contrast, the Bureau of Economic Analysis' general Gross Domestic Product (GDP) deflator[3] measures changes in the prices of goods and services produced in the United States, including those exported to other countries, and captures price changes across all economic sectors.

We report all values in 2024$ for consistency, using a 15% upward adjustment to account for price changes from 2021 to 2024. These values can be easily adjusted to any other-year dollars by applying the appropriate index adjustment. Landed value may be adjusted using the PPI index. For impact values, including upstream and downstream effects (see below), it is more appropriate to use the GDP deflator to adjust, because the multipliers capture economy-wide impacts.

[2] https://www.bls.gov/ppi/#data

[3] https://apps.bea.gov/iTable/iTable.cfm?reqid=19&step=2#reqid=19&step=2&isuri=1&1921=survey

Estimated indirect and induced economic impacts

Economic impact multipliers reflect the linkages between economic activity in different sectors of the economy. For example, when landings increase in the commercial fishing sector, there is an associated increase in the purchases of ice and other supplies in the region, and an increase in onshore transportation and processing of seafood. The resulting increases in economic activity in the commercial fishing supply and transportation and processing sectors are indirect effects of increased landings. In addition, because fishermen and workers in the supply, transportation, and processing industries earn greater income as a result of this increased activity, and spend some of that extra income on local goods and services, there is also an induced effect of greater spending in other sectors. The multipliers capture the combined effect of indirect and induced spending that results from higher commercial landings.

We have developed regional economic models for Rhode Island using the IMPLAN model software (IMPLAN 2004) and data for 2021. IMPLAN software and data are commercial products widely used by researchers and management agencies to perform economic impact analyses for a user specified study region (IMPLAN 2004; Steinback and Thunberg 2006; Hoagland *et al.* 2015; UMass Dartmouth 2018; Cape Cod Commission 2020). IMPLAN was initially developed for the US Forest Service. It is a modular input-output model that works down to the individual postal zip code level for most zip codes in the United States. The IMPLAN database consists of two major parts: (1) a national-level technology matrix and (2) estimates of sectoral activity for final demand, final payments, gross output, and employment for each zip code. This 546-sector gross-domestic-product-based model divides the US economy into sectors based on North American Industry Classification System codes[4], and is based on the US Commerce Department's national input-output studies, the national income data, and related Federal economic surveys. In IMPLAN, national average technology coefficients are used to develop the direct coefficients for sectors at local levels. As noted, we use 2021 IMPLAN data for Rhode Island for our analysis. Based on the 2022 model and data, the upstream output multiplier for the commercial fishing industry in Rhode Island is 1.341.

Our analysis is limited to economic activity and impact in Rhode Island; and this multiplier reflects upstream economic activity that takes place in Rhode Island, not in other states. Its value depends in part on how much of their inputs (fuel, ice, bait, etc.) Rhode Island fishermen purchase from local versus out-of-state suppliers. Because those purchase decisions can change from year to year, this multiplier can change over time.

We have also taken into account downstream economic activity, such as seafood processing, that may take place at Rhode Island businesses as a result of commercial fisheries landings. This linkage is less direct than the upstream activities, because not all seafood landed in a state is processed in the state, and seafood processors may import more seafood from elsewhere for processing when in-state landings fall short. Nonetheless, we add a downstream adjustment of 0.586, using 2022 IMPLAN data, to the multiplier for Rhode Island landings, bringing the combined multiplier to 1.927, to account for both upstream effects and downstream effects to seafood processors.

The economic impact multiplier captures the linkages between the fishing industry sector and other sectors in the Rhode Island economy. While we use a single output multiplier for the entire commercial

[4] https://www.census.gov/naics/

fishing sector in a given state, we recognize that the multiplier may in fact vary across specific fisheries, species, and gear, due to differences in factor inputs for fishing operations and post processing of fish landed. We use a single multiplier for the entire commercial fishing sector, reflecting an average across all gear types and species. Economy-wide inflation affects all sectors in the economy but usually does not alter the general structure of the economy. Therefore, although the baseline economic values increase with rising prices, the multiplier does not. We also recognize that other types of multipliers, such as those focusing on employment effects, have been used in other analyses. We maintain that the output multipliers we use provide a robust and accurate measure of indirect and inducted effects averaged across the fishing sectors.

Using these multipliers, and including the lobster and Jonah crab adjustment described in the previous section, we estimate the average annual total economic impact from commercial fishing activity in the Rhode Island state waters portion of the Brayton Point ECA to be about $689,000 (2024$) in Rhode Island.

Rhode Island-based charter fishing

To obtain data on for-hire charter fishing activity in the SouthCoast Wind Lease Area and Export Cable Corridor, we conducted an online survey of Rhode Island- and Massachusetts-based charter vessel operators. The survey asked operators to identify their fishing locations on a chart, and report for each location:

- the total number of annual for-hire fishing trips that vessel took in each of the years 2017-2021,
- the average number of passengers onboard for-hire trips in each of the years 2017-2021, and
- the average amount of time spent targeting highly migratory species (HMS) relative to bottom fishing or trolling for other species during for-hire trips.

The survey was first distributed on April 18, 2022 through email lists maintained by Rhode Island Department of Environmental Management (RIDEM), Rhode Island Coastal Resources Management Council (RICRMC) and Massachusetts Division of Marine Fisheries (MADMF), and also via email by for-hire fishing industry representatives, including the Rhode Island Party and Charter Boat Association. The survey was active from April 18, 2022 until May 14, 2022.

The survey received 91 total responses from for-hire charter owners and/or operators. Sixty-six of these respondents (72%) reported that they fish in the area depicted in Figure 4. These 66 respondents reported 62 unique vessels, and reported effort data for 29 of those vessels across the five-year period of 2017-2021 (black dots in Figure 4).

To capture for-hire effort focused specifically within Narragansett Bay, a second survey was conducted in October 2022 distributed among 17 for-hire charter captains known to fish primarily in Narragansett Bay as identified by members of the for-hire industry. This survey received a total of four responses reporting activity for four unique vessels not captured in the first survey wave (red dots in Figure 4). The second survey design was identical to that of the first wave with the addition of charts for Narragansett Bay. Combined results for the two surveys are shown in Table 6.

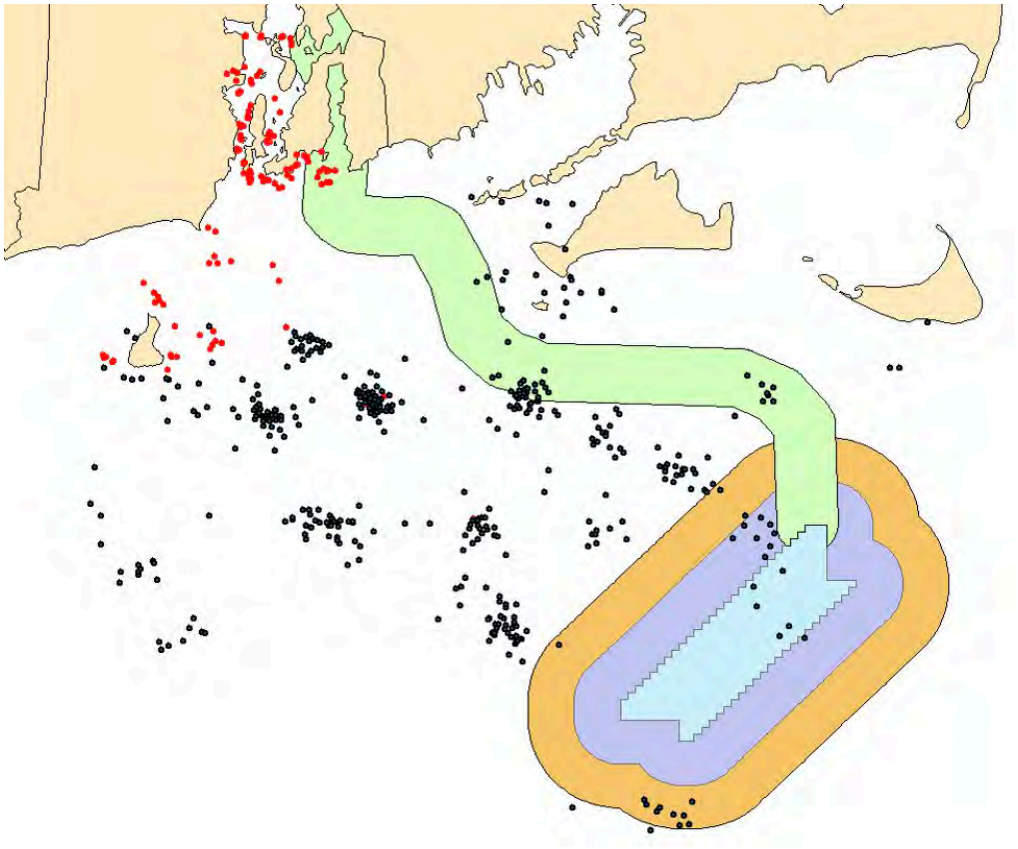

Figure 4. Charter fishing locations, 2017-2021, identified in survey responses. WLA is shown in light blue; 10 km wide Export Cable Route Area (ECRA) in light green.

Table 6. For-hire charter fishing survey summary statistics.

Description	Number
Fished in the area and responded to the survey	66
Provided vessel names	62
of which based in Rhode Island	24.5
Provided annual vessel trip numbers	31
Observations with vessel trips reported (2017-2021)	142
Total trips per year	1 – 235
Average total trips per year	47.30
Passengers per vessel trip	2 – 25
Average passengers per vessel trip	5.41
Identified fishing locations on maps	29
of which based in Rhode Island	10.5

Similar studies published in the peer-reviewed academic literature using paper mail, email, or mixed mode survey distributions typically have survey response rates around 20-30% (e.g., Dalton *et al*. 2020, Carr-Harris and Steinback 2020). Based on discussions with for-hire industry representatives, approximately 100 vessels actively engage in for-hire fishing activity in the waters depicted in Figure 5, suggesting the fishing reported by survey respondents accounts for about 33% of the total. The combined response rate for the primary population of interest is within an appropriate range to consider our survey distribution a success. An important note to also consider is that there are vessels in our sample that require the submission of federal VTRs. A common trend identified in the data was that some respondents did not provide data for their vessels that require VTRs. This is not a problem for this analysis as this effort data is already accounted for by the NOAA databases and summary reports used as a baseline for our subsequent analyses.

The number of anglers per year is estimated by multiplying the vessel trip number in a year and the average number of anglers per trip in that year for each vessel, and the results are then summed across vessels by area. Table 7 show the annual vessel trips and angler counts in the survey responses for charter vessels based in Rhode Island.

Table 7. Number of Rhode Island-based vessel trips and anglers by year, Brayton Point ECRA.

Year	Vessel Trips	Anglers
2017	22	77
2018	16	56
2019	18	58.5
2020	17	51
2021	10	30
Average	**16.6**	***54.5***

Table 8. SouthCoast Wind lease area for-hire vessel revenue estimates. Sources: NMFS 2023a and 2023b.

Year	**Revenue per angler** (2024$)
2009	115.18
2010	95.99
2011	164.55
2015	139.01
2016	109.69
2018	95.99
Average	**120.07**

We use the revenue per angler estimates from NOAA shown in Table 8 for our revenue calculation. We recognize that the per angler revenue from charter boats may be an order of magnitude larger than that

from party boats. Party boats, or head boats, are certified by the U.S. Coast Guard to carry more than six passengers, allowing them to offer lower per angler fishing rates relative to other charter vessels, which are limited to carrying at most six passengers. There could be as many as 100 passengers on a single party boat trip. The data in Table 8 represent an average across both sectors, influenced by the fact that many more people participate in party boat fishing than in charter fishing. There is no per-angler revenue data specific to the SouthCoast Wind WLA available from NOAA as of the writing of this report. We therefore rely on estimates from nearby lease areas (Bay State Wind and Vineyard Wind 1) as a proxy of what we expect SouthCoast Wind WLA revenues to be.

For vessels in inland and nearshore waters, the cost and revenue estimates are significantly lower than those in offshore waters, primarily because fishing locations in close proximity to shore usually require significantly less fuel for the round trip. Also, vessels fishing inshore waters are often smaller than those fishing offshore, further reducing fuel consumption. We estimate the average revenue in the nearshore water at $90.05 per angler trip, which is 75% of the revenue assumed for the SouthCoast WLA ($120.07 per trip). We consider this estimate to be very conservative. An estimated 10 to 30 for-hire charter vessels operate in these nearshore waters. Given the sample of 5 respondents from the inland waters, we scale up the data collected during the survey to better reflect actual fishing effort using low- and high- scale factors of 2 and 6. Finally, an economic impact multiplier is used to reflect the overall economic impacts associated with the charter fishing direct revenue. As with commercial fishing, we recognize that this multiplier will in fact vary with different types of charter fishing (e.g. sport fishing charters versus party boats). The multiplier we use is calculated using data in the NOAA report by Lovell *et al*. (2020), and reflects an average across different types of charter fishing. The Lovell *et al.* study is based on data from NOAA's 2016-2017 National Marine Recreational Fishing Expenditure Survey; we are not aware of any more recent data on the for-hire charter fishing industry. The results are shown in Table 9.

Table 9. Annual revenue and economic impact from RI-based charter fishing in RI state waters.

Area	**Annual anglers**	**Revenue per angler** (2024$)	**Scale factor**	**Annual revenue** (2024$)	**Impact multiplier**	**Annual impact** (2024$)
Brayton Point ECRA,	54.5	$90.05	2	$9,816	1.622	$15,921
state waters	54.5	$90.05	6	$29,446	1.622	$47,762

As shown in Table 9, our estimates of total annual economic impact from charter fishing in the RI state waters sections of the 10km-wide Brayton Point Export Cable Route Area range from $16,000 to $48,000 per year (2024$).

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Appendix

Table A1. Species landed in Area 539, "finfish" dataset, average annual value and pounds 2008-2021.

Species	Value (2024$/year)	Landings (lbs/year)
SKATES, RAJIDAE (FAMILY)	12,451,802	4,768,040
FLOUNDER, SUMMER	2,990,152	625,922
LOBSTER, AMERICAN	2,304,823	308,682
SKATE, LITTLE	1,951,038	738,134
WHELK, CHANNELED	1,901,474	196,196
SQUID, LONGFIN LOLIGO	1,464,872	862,705
SCUP	871,524	1,029,575
GOOSEFISH	868,701	340,187
SCALLOP, SEA	707,556	54,795
BASS, BLACK SEA	584,665	111,497
BASS, STRIPED	513,874	91,254
HERRING, SEA, ATLANTIC	492,320	2,820,082
FLOUNDER, WINTER	486,074	157,428
HAKE, SILVER	432,297	655,257
FLOUNDER, YELLOWTAIL	370,870	150,149
COD, ATLANTIC	229,327	63,459
BLUEFISH	170,207	187,631
BUTTERFISH	163,863	176,955
CRAB, JONAH	113,464	117,299
MACKEREL, ATLANTIC	97,812	274,436
TAUTOG	74,975	18,518
SHARK, DOGFISH, SPINY	64,754	233,414
HAKE, RED	62,009	168,822
SKATE, WINTER	57,656	279,180
BONITO, ATLANTIC	24,907	8,006
CRAB, ROCK, ATLANTIC	17,905	25,268
CRAB, HORSESHOE	15,089	8,601
SHARK, DOGFISH, SMOOTH	11,962	15,051
WHELK, KNOBBED	8,241	2,241
MENHADENS	5,262	14,947
EEL, CONGER	4,812	5,576
SEAROBINS	3,689	9,239
FLOUNDER, WITCH	2,774	848
TRIGGERFISHES	2,440	926
TRIGGERFISH, GRAY	2,425	1,302
FLOUNDER, WINDOWPANE	2,190	2,961
CRAB, GREEN	1,706	642

CUNNER	1,214	437
HADDOCK	1,032	787
CRAB UNKNOWN	788	300
SEATROUT, WEAKFISH	694	266
HAKE, WHITE	615	503
SEAROBIN, STRIPED	551	206
TUNA, YELLOWFIN	548	205
TILEFISH, GOLDEN	493	220
RAVEN, SEA	356	194
EEL, AMERICAN	285	221
COBIA	243	63
SHAD, HICKORY	210	297
TUNA, BIGEYE	137	52
DOLPHINFISH	85	57
KINGFISH, NORTHERN	82	68
SEATROUT, SPECIES NOT SPECIFIED	74	121
DORY, AMERICAN JOHN	73	93
DRUMS	60	23
TUNA, ALBACORE	39	23
SQUID, SHORTFIN ILLEX	19	37
POLLOCK	16	11
MACKEREL, SPANISH	6	2
MACKEREL, ATLANTIC CHUB	2	3

Commercial Fisheries Landings and For-Hire Charter Fishing Revenue Exposure to the SouthCoast Wind Export Cable Corridor in Rhode Island State Waters

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Woods Hole Oceanographic Institution

19 June 2025

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List of Abbreviations

COP – Construction and Operations Plan

ECC – Export Cable Corridor

ECR – Export Cable Route

ECRA – Export Cable Route Area

FAB – Fishermen's Advisory Board

GDP – Gross Domestic Product

MA DEP – Massachusetts Department of Environmental Protection

MA DMF – Massachusetts Division of Marine Fisheries

NEMFIS – Northeast Marine Fisheries Information System

NMFS – National Marine Fisheries Service

NOAA – National Oceanographic and Atmospheric Administration

PPI – Producer Price Index

RICRMC – Rhode Island Coastal Resources Management Council

RIDEM – Rhode Island Department of Environmental Management

SBRM – Standardized Bycatch Reporting Methodology

VMS – Vessel Monitoring System

VTR – Vessel Trip Report

WLA – Wind Lease Area

Summary

Based on Rhode Island Department of Environmental Management data from 2008 to 2021, we estimate the average annual value of commercial landings from Rhode Island State waters in the vicinity of the SouthCoast Wind Brayton Point Export Cable Corridor to be $18,200/km^2/year from finfish, $43,800/km^2/year from shellfish, and $25,200/km^2/year from mantis shrimp in the Rhode Island portion of Mt. Hope Bay (all values in 2024$). The Brayton Point Export Cable Area (ECA; defined here as a 180 m wide lane surrounding the export cables) has a footprint of about 6.1 km^2 in Rhode Island state waters. We estimate the average annual landed value in Rhode Island from commercial fishing in the ECA to be $398,000, resulting in total economic impact in Rhode Island of $766,000 per year when accounting for indirect and induced effects.

A survey of Rhode Island and Massachusetts-based charter fishing suggests that the annual revenue to Rhode Island-based charter fishing vessels from fishing in the RI state waters portions of the Brayton Point Export Cable Corridor is between $9,800 and $29,400 (2024$). Including indirect and induced effects, this results in total economic impact between $15,900 and $47,800 per year.

Given development timelines and external factors that can affect the final SouthCoast Wind Project 1 and Project 2 construction schedules, we assess the present value of fisheries exposure to the Brayton Point Export Cables for a range of cable installation scenarios. Based on a two-month cable installation schedule for the sections of the SouthCoast Wind Project 1 Brayton Point Export Cable in Rhode Island waters, we estimate conservatively a total exposure (in 2024$) of Rhode Island commercial landed value of $215,000 (2031 cable installation) to $261,000 (2027 cable installation). The corresponding values for charter fishing revenue are $3,800 and $4,600.

Including indirect and induced (onshore) effects, total Project 1 cable exposure impact is estimated to be $414,000 (2031 cable installation) to $503,000 (2027 cable installation) for Rhode Island commercial fishing, and $6,200 to $7,500 for charter fishing.

The corresponding values for the SouthCoast Wind Project 2 Brayton Point export cable are $185,000 (2034 cable installation) to $225,000 (2030 cable installation) for commercial landed value, $3,300 to $4,000 for charter fishing revenue, $357,000 to $434,000 for total commercial impact, and $5,300 to $6,500 for total charter fishing impact (2024$).

Introduction

This report estimates the level of pre-development fishing operations intersecting with, and landings and landed value from, the SouthCoast Wind Brayton Point Export Cable Route (shown in orange in Figure 1) in Rhode Island state waters. It also estimates the economic value of Rhode Island-based fishing operations that may be at risk due to installation, operation, and decommissioning of the Brayton Point export cables.

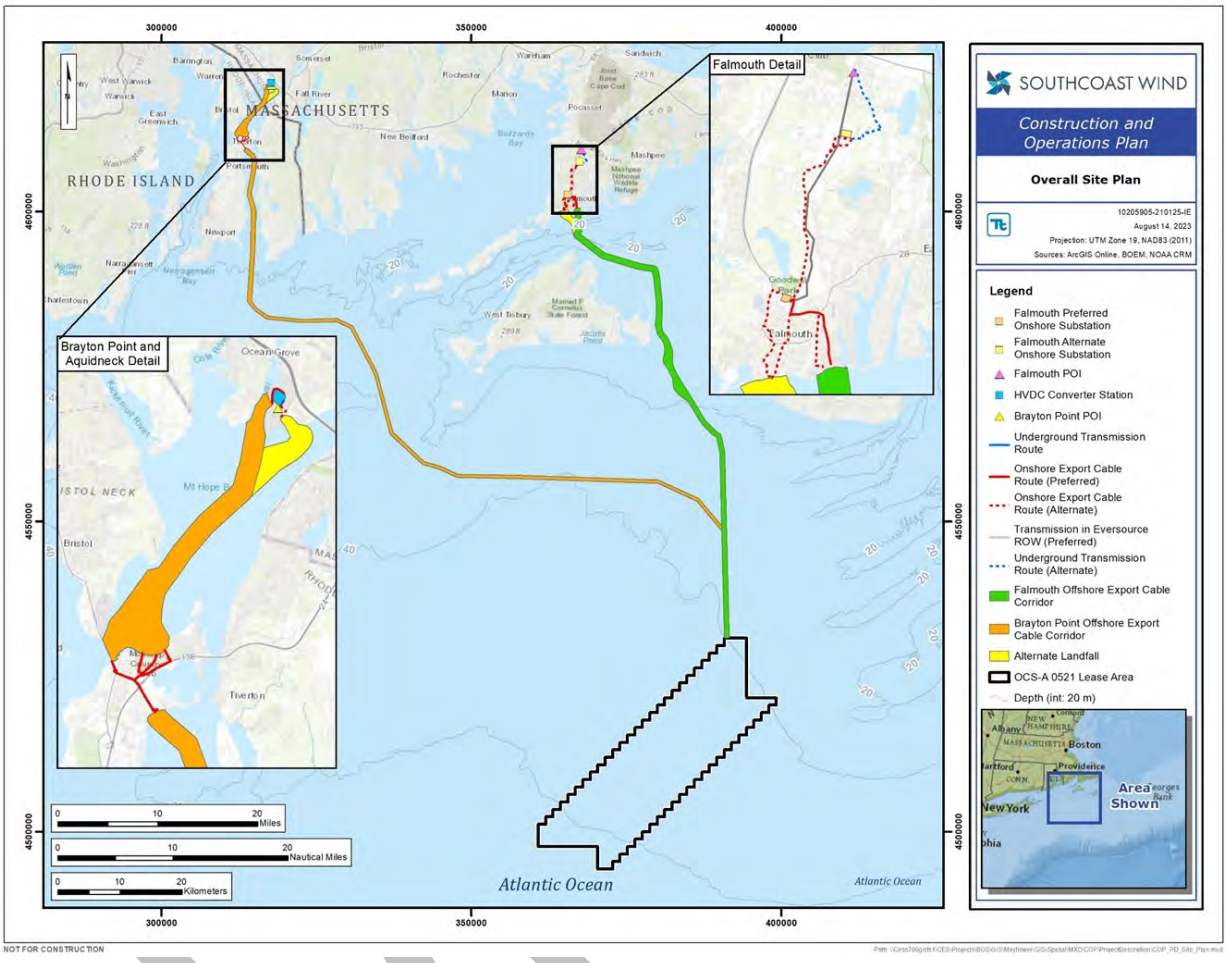

Figure 1. SouthCoast Wind Lease Area and export cable routes. Source: SouthCoast Wind.

The Wind Lease Area (WLA) for SouthCoast Wind (OCS-A 0521) is outside of Rhode Island state waters and the 2011 and 2018 Rhode Island Geographic Location Description areas (GLDs). The WLA lies in federal waters, roughly 25 nautical miles south of Nantucket and 51 nautical miles southeast of the Rhode Island coast, and has a footprint of 516 km^2. The Export Cable Corridor (ECC) to Brayton Point is 156 km in length (148 km of which lie outside the WLA), and runs from the northern edge of the WLA first to the north and west across Rhode Island Sound, then up the Sakonnet River to its landing location at Brayton Point in Somerset, MA. A second Export Cable Corridor is included in SouthCoast Wind's federal permits as a variant option and runs from the WLA to Falmouth, MA. The Falmouth variant option is only located in federal and Massachusetts state waters and therefore is not considered further

in this assessment. SouthCoast Wind plans to develop the WLA in two phases (Project 1 and Project 2), each with its own export cable bundle. SouthCoast Wind's preferred approach is to use the Brayton Point ECC for both Project 1 and Project 2. The focus of this assessment is on the portion of the Brayton Point ECC that overlaps with RI State Waters, most of which lies within the Sakonnet River.

The Brayton Point ECC is at maximum 700 m wide and represents the corridor within which the cables will be located; it has no physical significance in the context of fisheries impacts. Only portions of the narrow, 180 m wide Export Cabe Area (ECA) centered on the export cables themselves may be disturbed in the process of burying and decommissioning the cables.

The state waters portion of the Brayton Point ECC lies entirely in NOAA Northeast Marine Fisheries Information System (NEMFIS) Statistical Reporting Area 539 (Figure 2). In the Sakonnet River, the Brayton Point ECC transects portions of Rhode Island Shellfish Harvest Areas 4A, 4B, 4C, 4D, and 17 (Figure 3).

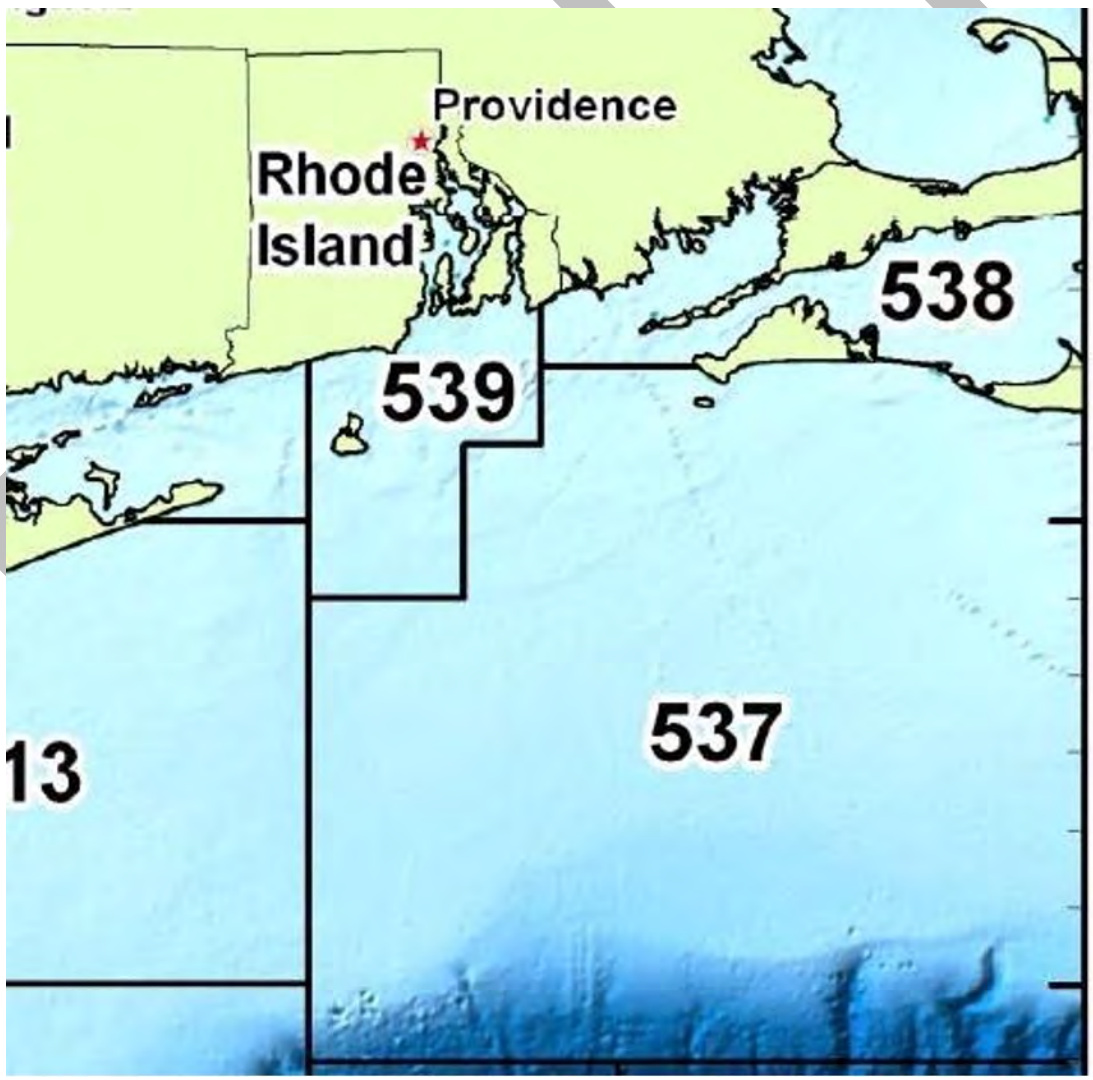

Figure 2. NOAA Fisheries Statistical Reporting Areas. Source: ACCSP (2021).

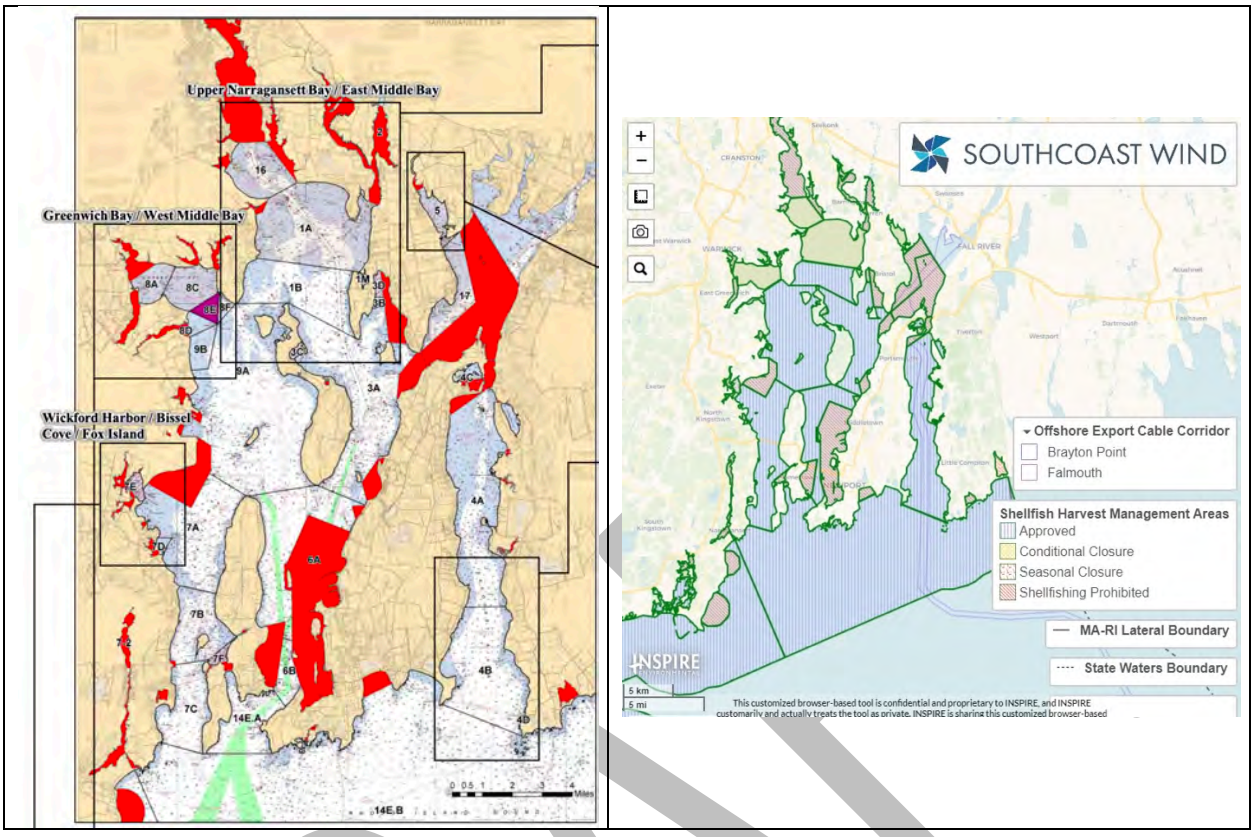

Figure 3. Rhode Island Shellfish Harvest Areas and SouthCoast Wind ECC. Shellfishing is prohibited in areas shown in red. Sources: RIDEM, SouthCoast Wind.

Table 1 shows the approximate length and area of the relevant features for the SouthCoast Wind Project. In the sections that follow, fishery landings and values for the Export Cable Route are estimated and reported for the 180 m wide Export Cable Area, as defined above.

Table 1. SouthCoast Wind area parameters

Wind Lease Area (WLA) footprint (km^2)	516
Brayton Point Export Cable Route length (km)	156
of which in Rhode Island state waters (km)	34
Footprint of 180 m Export Cable Area in RI state waters (km^2)	6.1

Methodology

There are two sources of data on commercial fisheries landings from the SouthCoast Wind project areas. The first is a dataset on landings and landed value from NOAA's National Marine Fisheries Service. This dataset uses modeled representations of federal Vessel Trip Report (VTR) and clam logbook fishing trip data to produce an accurate spatial allocation of landings from each fishing trip (DePiper 2014; Benjamin *et al.* 2018). It is used among others by BOEM (2023) for its assessment of fisheries landings from the SouthCoast WLA, and represents the most comprehensive source of commercial fisheries data for federal waters. This dataset does not include landings associated with state permits, and therefore underestimates the landings and landed value from the state waters portion of the ECA.

To address this issue, we use a second dataset on landings from the Rhode Island Department of Environmental Management (RIDEM) on fisheries landings from NOAA Fisheries Statistical Reporting Area 539 (Figure 2) for the years 2008 to 2021. The RIDEM data are compiled as the total yearly pounds landed, by species. We use data from NOAA on prices by species to estimate the landed value associated with the RIDEM reported landings. RIDEM also reports shellfish harvest by harvest areas within Rhode Island state waters (Figure 3); we use this information to supplement the Area 539 landings data. Annual landings reported in each of these datasets vary from year to year; we use the average landings and landed value from 2008 to 2021 as indicative of what the area may yield in the future.

During a meeting on May 5, 2025 of the RI Coastal Resources Management Council (CRMC), RI CRMC's Fishermen's Advisory Board (FAB), SouthCoast Wind, and WHOI, members of the FAB raised concerns about the mantis shrimp fishery centered in Mt. Hope Bay not being explicitly reflected in the RIDEM data used in the baseline assessment. In response to these concerns, we have worked closely with RIDEM to obtain data on mantis shrimp landings for recent years and included this in our analysis.

Once we establish the baseline values, we then estimate the fraction of this annual value that may be at risk ("exposed") due to SouthCoast Wind Export Cable Route development in Rhode Island waters, based on the nature and schedule of installation activities, operating plans, and decommissioning plans.

The effect of offshore wind farm construction and operation on marine ecosystems, fish stocks and fish behavior, and fishery landings is an area of ongoing research. Given the current state of knowledge about the effects of wind farm construction and operation on fish stocks and fishery landings (Hogan *et al.* 2023), we consider five categories of possible exposure for Rhode Island fishing activity from the SouthCoast Wind Export Cables:

- Transient effects on species availability due to installation activities
- Transient effects due to constrained access to certain areas during installation
- Changes in fishing during operations
- Transient effects due to constrained access to certain areas during decommissioning
- Transient effects on species availability due to decommissioning activities

We also consider transient effects on the for-hire charter fishing industry due to installation and decommissioning of the export cables. To the extent that for-hire charter fishing vessels use the ECA, it is possible that their activities may be affected during construction and decommissioning. We consider it unlikely that SouthCoast Wind development will negatively affect the personal recreational or subsistence fishing activities.

As we document below, there has been considerable variability in annual landings from these areas over the past decade. Some of this variability reflects normal year-to-year fluctuations in stocks and fishing effort; and some reflects long-term shifts in stocks due to changing environmental conditions. We take these factors into account in estimating what the areas are likely to yield in the future. Throughout this report, we use "landed value" to refer to the direct value of fisheries landings, "impact" to refer to the economic activity generated by fisheries, including indirect and induced effects (see below), and "exposure" to refer to the portion of landed value or impacts that may be at risk due to wind farm development.

We presented preliminary baseline results at a Rhode Island CRMC/FAB meeting on May 5, 2025. Based on feedback received from FAB members and subsequent discussions with RIDEM and CRMC, we revisited and updated our baseline analysis, with particular focus on whelk and mantis shrimp fishing, and on oyster aquaculture operations. The values in this report reflect that updated analysis.

Baseline commercial fishery landings and values

The RIDEM Area 539 commercial landings quantity statistics come in two separate data sets. The first set includes mainly finfish species measured in "hail weight" pounds, and the second includes shellfish species measured in "live weight" pounds. We assume RIDEM "hail weight" and "live weight" are consistent with NMFS landed weight and live weight designations, respectively. In addition, a third data set obtained from RIDEM includes shellfish species harvested from Areas 4A, 4B, 4C, 4D and 17 (Figure 3).

The Area 539 data are based on Vessel Trip Reports (VTRs) and state logbook entries. RIDEM does not currently provide revenue or price data associated with these landings, because neither VTRs nor state logbooks include price data. We use the price by species data from NOAA (described below) to estimate the revenues for landings from Area 539. For the three shellfish species measured in live weight, we use annual prices (in $/live pound) reported by the Maine Department of Marine Resources[1] because this is the most detailed and consistent such dataset for the Northeast.

Some fraction of lobster and Jonah crab landings are sold directly from boats at dockside, at a price above that reported in the dealer information on which the NOAA values above are based. Neither the fraction of landings sold in this way nor the price premium is known exactly. Based on information provided by a group of Rhode Island fishermen (pers. comm., 24 Nov. 2020), we estimate that a 15% premium on the landed value adequately captures this dockside sales effect for Rhode Island landings.

The resulting average annual landings and estimated landed value for selected species from Area 539 during the period from 2008 to 2021 are shown in Table 2. See Table A1 in the appendix for complete list.

[1] https://www.maine.gov/dmr/fisheries/commercial/landings-program/historical-data.html

Table 2: Baseline average annual landings and landed value (2008-2021) for Area 539, selected species, estimated from data provided by RIDEM, NOAA.

Species/group	Landings (million lbs/year)	Value (2024$ millions/year)
Skates, Rajidae (Family)	4.77	12.45
Flounder, Summer	0.63	2.99
Lobster, American	0.31	2.30
Skate, Little	0.74	1.95
Whelk, Channeled	0.20	1.90
Squid, Longfin Loligo	0.86	1.46
Scup	1.03	0.87
Goosefish	0.34	0.87
Scallop, Sea	0.05	0.71
Bass, Black Sea	0.11	0.58
Bass, Striped	0.09	0.51
Herring, Sea, Atlantic	2.82	0.49
Flounder, Winter	0.16	0.49
Hake, Silver	0.66	0.43
Flounder, Yellowtail	0.15	0.37
Others… (see Appendix)		
Whelk, Knobbed	0.01	0.01

The values in Table 2 likely understate landings and landed value for some species, because confidentiality requirements (such as the "rule of three") prevent RIDEM from disclosing data that could allow a specific harvester's landings to be identified. As a result, some landings are excluded from the species-level data we received from RIDEM. We are not able to adjust for this with species-specific factors, but we can make approximate adjustments based on annual totals, as follows. Table 3 shows the total annual value for all Area 539 landings from the "finfish" dataset in column 2, the sum of landings reported at the species level in column 3, and the fraction of landings (by weight) not captured in the species-level data in column 4. The final column shows our estimate of the landed value for the Area 539 data, adjusting for the fraction not captured at the species level, and for dockside sales of lobster and Jonah crab as discussed above. All values are shown in 2024 dollars (see discussion below on inter-annual price adjustments). The resulting average annual landed value from 2008 to 2021 for all species in the Area 539 "finfish" dataset is $48.8 million (2024$).

Table 3: Annual value and landings of commercial fisheries from Area 539. Source: RIDEM.

Year	Total landings* (million lbs)	Sum of landings by species** (million lbs)	Percentage of total landings not captured in species-level data	Value*** (2024$ millions)
2008	18.0	14.8	18%	40.6
2009	23.7	21.6	9%	30.0
2010	18.1	13.4	26%	31.9
2011	28.0	19.9	29%	54.5
2012	34.7	20.1	42%	86.2
2013	39.6	18.5	53%	88.8
2014	32.7	24.8	24%	51.6
2015	27.4	18.7	32%	46.0
2016	24.8	14.9	40%	57.1
2017	19.5	11.0	43%	47.4
2018	18.0	12.4	31%	51.6
2019	18.0	13.2	26%	39.7
2020	16.1	14.0	13%	25.2
2021	17.3	11.8	31%	33.1
avg. 2008-21	**24.0**	**16.4**	**30%**	**48.8**

* RIDEM reported hail weight. We assume RIDEM hail weight = NMFS landed weight.

** Sum of RIDEM reported weight by species. Species-level data do not include landings subject to the rule-of-three restrictions.

*** Price by species data is from NMFS. Based on RIDEM species-level landings, adjusted for fraction not captured in this data set (column 4) due to confidentiality requirements.

As noted above, RIDEM provides a separate dataset for shellfish landings from Area 539. Annual value estimates for these landings are shown in Table 4. According to RIDEM (pers. comm. Sept. 2024), their reported landings in this dataset understate the total landings on average by 0.5% due to confidentiality rules. We therefore adjust the average annual landings from 2008 to 2021 by 0.5% to obtain an average annual value of $7.23 million (2024$). Because we have more location-specific information about shellfish harvest for the state waters areas in the immediate vicinity of the Brayton Point Export Cable Route from Rhode Island Shellfish Harvest Area data (see below), we do not use the Area 539 data on shellfish in our calculations, but include the information here for reference.

Table 5 shows annual landings reported by RIDEM, and our estimates of annual value, for shellfish from Rhode Island Shellfish Harvest Areas 4A, 4B, 4C, 4D, and 17 – the Harvest Areas intersecting with the Brayton Point Export Cable Route. According to RIDEM (pers. comm. Sept. 2024 and May 2025), their reported landings understate the total landings on average by 14% and for whelk by up to 20% due to confidentiality rules and inconsistent reporting. We therefore adjust whelk landings up by 20% and other landings for these Harvest Areas from 2008 to 2021 by 14% to obtain an average annual value of $2.45 million (2024$).

Table 4: Annual landings of "other commercial shellfish" from Area 539. Source: RIDEM, NMFS.

Year	**Landings*** (million lbs)	**Value**** (2024$ millions)
2008	4.11	5.89
2009	3.47	4.52
2010	4.21	5.14
2011	4.70	6.39
2012	6.47	9.10
2013	5.69	7.94
2014	5.80	8.50
2015	5.16	9.19
2016	5.06	9.37
2017	4.13	7.60
2018	3.82	7.58
2019	3.71	8.10
2020	2.61	4.71
2021	2.59	6.72
average	**4.39**	**7.20**
adjusted +0.5%* **	**4.42**	**7.23**

* Species include "Clam, Quahog, Northern," "Soft-Shell Clam," and "Oyster" in the RIDEM data.

** Price by species data is from NMFS.

*** See text above for details on 0.5% adjustment.

Table 5: Annual landings from RI Shellfish Harvest Areas 4A, 4B, 4C, 4D, and 17. Source: RIDEM, NMFS.

Year	**Landings*** (million lbs)	**Value**** (2024$ millions)
2008	0.48	0.64
2009	0.49	0.69
2010	0.50	0.56
2011	1.13	2.62
2012	1.05	2.70
2013	1.03	1.93
2014	0.89	1.71
2015	0.68	1.60
2016	0.82	3.44
2017	0.92	3.05
2018	1.02	3.66
2019	0.99	3.00
2020	0.77	2.16
2021	0.24	1.54
average	**0.79**	**2.09**
adjusted* **	**0.90**	**2.45**

* Species include "Clam, Quahog, Northern", "Soft-Shell Clam", "Oyster", " Whelk, Channeled", and "Whelk, Knobbed" in the RIDEM data.

** Price by species data is from NMFS.

*** See text above for details on whelks (20%) and other species (14%) adjustment.

We build our estimate of total (all species) landed value from the Rhode Island state waters along the Brayton Point Export Cable Route from the combined values from the Area 539 "mainly finfish" dataset (Table 3) and the RI Harvest Area shellfish dataset (Table 5). The only overlap between the two is whelks, which contribute an estimated $2.29 million per year in Area 539 ($1.91 million plus 20% to account for loss of capture due to confidentiality). Subtracting this from the annual average from Table 3, and using the Area 539 footprint of 2,550 km^2, we obtain an average landed value density of $18,200/$km^2$/year for the Area 539 "finfish" dataset. The footprint of RI Harvest Areas 4A/B/C/D and 17 is 55.8 km^2, so average landed value density for those data, based on the adjusted values in Table 5, is $43,800. Assuming conservatively that the shellfish value density extends to the areas south of the RI Harvest Areas as well, we therefore estimate the total landed value density along the Export Cable Route in Rhode Island state waters to be $62,000/$km^2$/year.

There are several oyster aquaculture lease areas along the shorelines of the Sakonnet River, some within about 300 m of the boundaries of the ECA. Production from these shellfish farms is not included in the landed value data we described above. During the May 5, 2025 meeting of RI CRMC, the FAB, SouthCoast Wind, and WHOI, some questions and concerns were raised about potential impacts of cable installation on aquaculture operations, specifically around sediment deposition and exposure to potentially contaminated sediment suspended in the water column. As discussed in that meeting as well as the following meeting of the FAB on May 22, 2025, SouthCoast Wind has thoroughly analyzed hydrodynamics surrounding sediment dispersal and deposition in the Sakonnet River and Mt. Hope Bay through a modeling effort led by a third-party subject matter expert in support of state and federal permitting processes[2]. That report indicated that sediment dispersion and deposition will be limited to the immediate vicinity of cable installation activities, will not extend outside of the Export Cable Corridor, and will be limited in duration (i.e., on the order of minutes to hours). It was also noted during meetings with the FAB that sediment sampling of parts of Mt. Hope Bay within MA state waters showed that there were no contaminant levels that exceed any Massachusetts Contingency Plan (MCP) reportable levels[3] established by MA Department of Environmental Protection (MA DEP), and that a similar sediment sampling effort will occur in RI waters prior to the start of cable installation as a condition of SouthCoast Wind's RI 401 Water Quality Certificate and Marine Dredge Permit issued by RIDEM. Due to the localized spatiotemporal nature of sediment transport during cable installation and acknowledging that aquaculture operations in the Sakonnet River are sited outside of the SouthCoast Wind export cable corridor, impacts to aquaculture operations are not anticipated. Therefore, farmed shellfish from aquaculture operations are not included in the baseline or exposure assessment.

As noted above, we consider separately the fishery for mantis shrimp in Mt. Hope Bay. RIDEM (pers. comm. May 2025) reports mantis shrimp landings of 27,711 lbs for Area 539 in 2023, and an average price of $11.82/lb (2022-24), for an estimated annual value of $327,544 (2024$). Based on discussion with RI fishermen (pers. comm. May 2025), we understand that the fishery is heavily concentrated in the RI portion of Mt. Hope Bay, bounded by a line between Common Fence Point and Mt. Hope Point in the southwest and the Massachusetts-Rhode Island state line in the northeast – an area of about 13 km^2,

[2] See Attachment L to SouthCoast Wind RI Category B Assent application: https://www.crmc.ri.gov/windenergy/southcoast/SCW_CatBAppAttachmentsRed.pdf

[3] https://app.box.com/s/0f5hd9sbss8m6mkrib8hgz0q6l6bb5u7

and encompassing about 4 km of the Export Cable Route. To be conservative, we assume that all of the Area 539 mantis shrimp value is landed from this area, for an annual landed value of $25,196/km^2.

Applying the per unit area value estimated above to the Rhode Island state waters footprint of the Brayton Point ECA (6.1 km^2) and its footprint in the mantis shrimp fishing grounds in Mt. Hope Bay (4km * 180m = 0.72 km^2) results in total annual value for Rhode Island landings from the state waters portion of the 180 m Brayton Point ECA of $398,000 (2024$).

Inter-annual price adjustments

We use the Bureau of Labor Statistics' Producer Price Index (PPI) for "unprocessed and prepared seafood"[4] to convert ex-vessel value of fish landings, because this index is specifically for the fishery sector. PPI is a family of indexes that measures the average change over time in selling prices received by domestic producers of goods and services; they measure price change from the perspective of the seller. In contrast, the Bureau of Economic Analysis' general Gross Domestic Product (GDP) deflator[5] measures changes in the prices of goods and services produced in the United States, including those exported to other countries, and captures price changes across all economic sectors.

We report all values in 2024$ for consistency, using for example a 15% upward adjustment to account for price changes from 2021 to 2024. These values can be easily adjusted to any other-year dollars by applying the appropriate index adjustment. Landed value may be adjusted using the PPI index. For impact values, including upstream and downstream effects (see below), it is more appropriate to use the GDP deflator to adjust, because the multipliers capture economy-wide impacts.

Estimated indirect and induced economic impacts

Economic impact multipliers reflect the linkages between economic activity in different sectors of the economy. For example, when landings increase in the commercial fishing sector, there is an associated increase in the purchases of ice and other supplies in the region, and an increase in onshore transportation and processing of seafood. The resulting increases in economic activity in the commercial fishing supply and transportation and processing sectors are indirect effects of increased landings. In addition, because fishermen and workers in the supply, transportation, and processing industries earn greater income as a result of this increased activity, and spend some of that extra income on local goods and services, there is also an induced effect of greater spending in other sectors. The multipliers capture the combined effect of indirect and induced spending that results from higher commercial landings.

We have developed regional economic models for Rhode Island using the IMPLAN model software (IMPLAN 2004) and data for 2021. IMPLAN software and data are commercial products widely used by researchers and management agencies to perform economic impact analyses for a user specified study region (IMPLAN 2004; Steinback and Thunberg 2006; Hoagland *et al.* 2015; UMass Dartmouth 2018; Cape Cod Commission 2020). IMPLAN was initially developed for the US Forest Service. It is a modular input-output model that works down to the individual postal zip code level for most zip codes in the United States. The IMPLAN database consists of two major parts: (1) a national-level technology matrix

[4] https://www.bls.gov/ppi/#data

[5] https://apps.bea.gov/iTable/iTable.cfm?reqid=19&step=2#reqid=19&step=2&isuri=1&1921=survey

and (2) estimates of sectoral activity for final demand, final payments, gross output, and employment for each zip code. This 546-sector gross-domestic-product-based model divides the US economy into sectors based on North American Industry Classification System codes[6], and is based on the US Commerce Department's national input-output studies, the national income data, and related Federal economic surveys. In IMPLAN, national average technology coefficients are used to develop the direct coefficients for sectors at local levels. As noted, we use 2021 IMPLAN data for Rhode Island for our analysis. Based on the 2022 model and data, the upstream output multiplier for the commercial fishing industry in Rhode Island is 1.341.

Our analysis is limited to economic activity and impact in Rhode Island; and this multiplier reflects upstream economic activity that takes place in Rhode Island, not in other states. Its value depends in part on how much of their inputs (fuel, ice, bait, etc.) Rhode Island fishermen purchase from local versus out-of-state suppliers. Because those purchase decisions can change from year to year, this multiplier can change over time.

We have also taken into account downstream economic activity, such as seafood processing, that may take place at Rhode Island businesses as a result of commercial fisheries landings. This linkage is less direct than the upstream activities, because not all seafood landed in a state is processed in the state, and seafood processors may import more seafood from elsewhere for processing when in-state landings fall short. Nonetheless, we add a downstream adjustment of 0.586, using 2022 IMPLAN data, to the multiplier for Rhode Island landings, bringing the combined multiplier to 1.927, to account for both upstream effects and downstream effects to seafood processors.

The economic impact multiplier captures the linkages between the fishing industry sector and other sectors in the Rhode Island economy. While we use a single output multiplier for the entire commercial fishing sector in a given state, we recognize that the multiplier may in fact vary across specific fisheries, species, and gear, due to differences in factor inputs for fishing operations and post processing of fish landed. We use a single multiplier for the entire commercial fishing sector, reflecting an average across all gear types and species. Economy-wide inflation affects all sectors in the economy but usually does not alter the general structure of the economy. Therefore, although the baseline economic values increase with rising prices, the multiplier does not. We also recognize that other types of multipliers, such as those focusing on employment effects, have been used in other analyses. We maintain that the output multipliers we use provide a robust and accurate measure of indirect and inducted effects averaged across the fishing sectors.

Using these multipliers, and including the lobster and Jonah crab adjustment described in the previous section, we estimate the average annual total economic impact from commercial fishing activity in the Rhode Island state waters portion of the Brayton Point ECA to be about $766,000 (2024$) in Rhode Island.

Rhode Island-based charter fishing

To obtain data on for-hire charter fishing activity in the SouthCoast Wind Lease Area and Export Cable Corridor, we conducted an online survey of Rhode Island- and Massachusetts-based charter vessel

[6] https://www.census.gov/naics/

operators. The survey asked operators to identify their fishing locations on a chart, and report for each location:

- the total number of annual for-hire fishing trips that vessel took in each of the years 2017-2021,
- the average number of passengers onboard for-hire trips in each of the years 2017-2021, and
- the average amount of time spent targeting highly migratory species (HMS) relative to bottom fishing or trolling for other species during for-hire trips.

The survey was first distributed on April 18, 2022 through email lists maintained by Rhode Island Department of Environmental Management (RIDEM), Rhode Island Coastal Resources Management Council (RICRMC) and Massachusetts Division of Marine Fisheries (MADMF), and also via email by for-hire fishing industry representatives, including the Rhode Island Party and Charter Boat Association. The survey was active from April 18, 2022 until May 14, 2022.

The survey received 91 total responses from for-hire charter owners and/or operators. Sixty-six of these respondents (72%) reported that they fish in the area depicted in Figure 4. These 66 respondents reported 62 unique vessels, and reported effort data for 29 of those vessels across the five-year period of 2017-2021 (black dots in Figure 4).

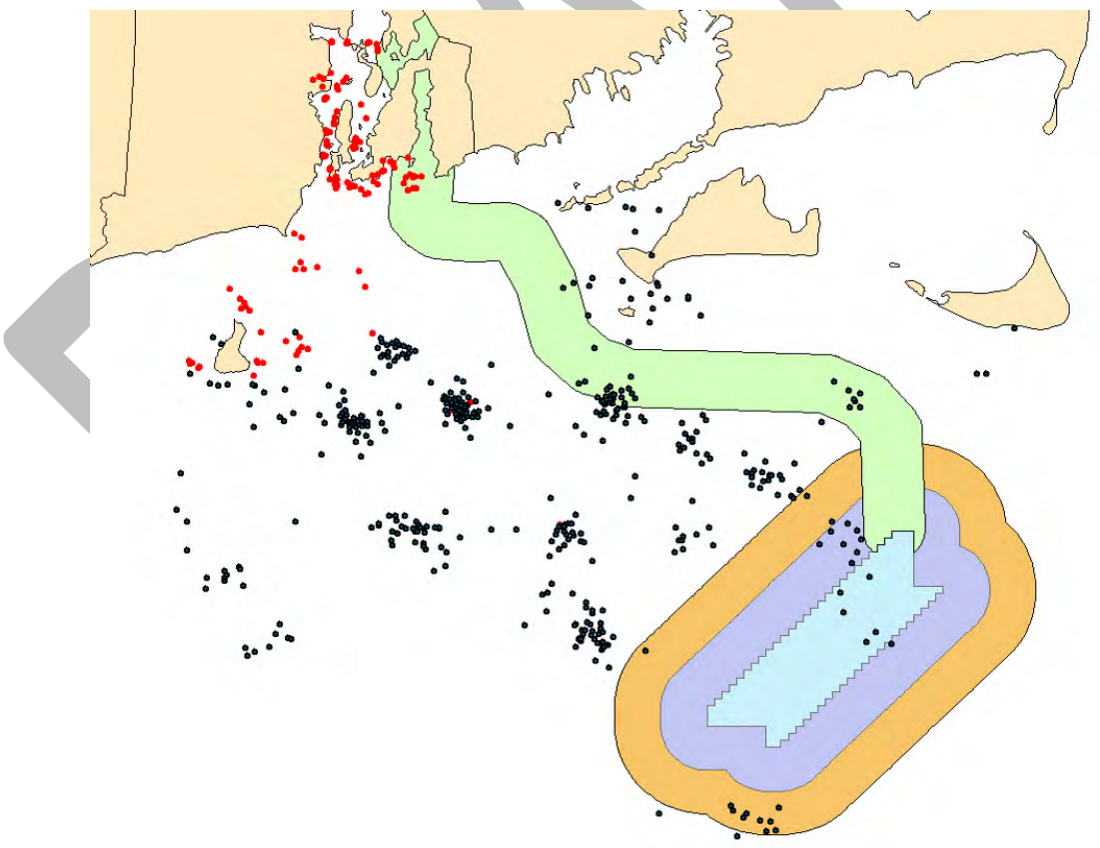

Figure 4. Charter fishing locations, 2017-2021, identified in survey responses. WLA is shown in light blue; 10 km wide Export Cable Route Area (ECRA) in light green.

To capture for-hire effort focused specifically within Narragansett Bay, a second survey was conducted in October 2022 distributed among 17 for-hire charter captains known to fish primarily in Narragansett Bay as identified by members of the for-hire industry. This survey received a total of four responses reporting activity for four unique vessels not captured in the first survey wave (red dots in Figure 4). The second survey design was identical to that of the first wave with the addition of charts for Narragansett Bay. Combined results for the two surveys are shown in Table 6.

Table 6. For-hire charter fishing survey summary statistics.

Description	**Number**
Fished in the area and responded to the survey	66
Provided vessel names	62
of which based in Rhode Island	24.5
Provided annual vessel trip numbers	31
Observations with vessel trips reported (2017-2021)	142
Total trips per year	1 – 235
Average total trips per year	47.30
Passengers per vessel trip	2 – 25
Average passengers per vessel trip	5.41
Identified fishing locations on maps	29
of which based in Rhode Island	10.5

Similar studies published in the peer-reviewed academic literature using paper mail, email, or mixed mode survey distributions typically have survey response rates around 20-30% (e.g., Dalton *et al*. 2020, Carr-Harris and Steinback 2020). Based on discussions with for-hire industry representatives, approximately 100 vessels actively engage in for-hire fishing activity in the waters depicted in Figure 5, suggesting the fishing reported by survey respondents accounts for about 33% of the total. The combined response rate for the primary population of interest is within an appropriate range to consider our survey distribution a success. An important note to also consider is that there are vessels in our sample that require the submission of federal VTRs. A common trend identified in the data was that some respondents did not provide data for their vessels that require VTRs. This is not a problem for this analysis as this effort data is already accounted for by the NOAA databases and summary reports used as a baseline for our subsequent analyses.

The number of anglers per year is estimated by multiplying the vessel trip number in a year and the average number of anglers per trip in that year for each vessel, and the results are then summed across vessels by area. Table 7 show the annual vessel trips and angler counts in the survey responses for charter vessels based in Rhode Island.

Table 7. Number of Rhode Island-based vessel trips and anglers by year, Brayton Point ECRA.

Year	Vessel Trips	Anglers
2017	22	77
2018	16	56
2019	18	58.5
2020	17	51
2021	10	30
Average	**16.6**	***54.5***

Table 8. Export Cable Route Area for-hire vessel revenue estimates. Sources: NMFS 2023a and 2023b.

Year	**Revenue per angler** (2024$)
2009	115.18
2010	95.99
2011	164.55
2015	139.01
2016	109.69
2018	95.99
Average	**120.07**

Note: Data from NOAA NMFS are used as a proxy for the SouthCoast project area, since revenue data specifically for the SouthCoast ECRA are not available.

We use the revenue per angler estimates from NOAA shown in Table 8 for our revenue calculation. We recognize that the per angler revenue from charter boats may be an order of magnitude larger than that from party boats. Party boats, or head boats, are certified by the U.S. Coast Guard to carry more than six passengers, allowing them to offer lower per angler fishing rates relative to other charter vessels, which are limited to carrying at most six passengers. There could be as many as 100 passengers on a single party boat trip. The data in Table 8 represent an average across both sectors, influenced by the fact that many more people participate in party boat fishing than in charter fishing. There is no per-angler revenue data specific to the SouthCoast Wind WLA available from NOAA as of the writing of this report. We therefore rely on estimates from nearby lease areas (Starboard Wind [formerly Bay State Wind] and Vineyard Wind 1) as a proxy of what we expect SouthCoast Wind WLA revenues to be.

For vessels in inland and nearshore waters, the cost and revenue estimates are significantly lower than those in offshore waters, primarily because fishing locations in close proximity to shore usually require significantly less fuel for the round trip. Also, vessels fishing inshore waters are often smaller than those fishing offshore, further reducing fuel consumption. We estimate the average revenue in the nearshore water at $90.05 per angler trip, which is 75% of the revenue assumed for the SouthCoast WLA ($120.07 per trip). We consider this estimate to be very conservative. An estimated 10 to 30 for-hire charter vessels operate in these nearshore waters. Given the sample of 5 respondents from the inland waters,

we scale up the data collected during the survey to better reflect actual fishing effort using low- and high- scale factors of 2 and 6. Finally, an economic impact multiplier is used to reflect the overall economic impacts associated with the charter fishing direct revenue. As with commercial fishing, we recognize that this multiplier will in fact vary with different types of charter fishing (e.g. sport fishing charters versus party boats). The multiplier we use is calculated using data in the NOAA report by Lovell *et al*. (2020), and reflects an average across different types of charter fishing. The Lovell *et al.* study is based on data from NOAA's 2016-2017 National Marine Recreational Fishing Expenditure Survey; we are not aware of any more recent data on the for-hire charter fishing industry. The results are shown in Table 9.

Table 9. Annual revenue and economic impact from RI-based charter fishing in RI state waters.

Area	Annual anglers	Revenue per angler (2024$)	Scale factor	Annual revenue (2024$)	Impact multiplier	Annual impact (2024$)
Brayton Point ECRA,	54.5	$90.05	2	$9,816	1.622	$15,921
RI state waters	54.5	$90.05	6	$29,446	1.622	$47,762

As shown in Table 9, our estimates of total annual economic impact from charter fishing in the RI state waters sections of the 10km-wide Brayton Point Export Cable Route Area range from approximately $16,000 to $48,000 per year (2024$).

Exposure of commercial fishery resources and fishing

SouthCoast Wind plans to carry out all work associated with installation of each export cable in Rhode Island waters within a 66-day period in the mid- and late-fourth quarter of the project calendar year (November and December). At the time of this report, the project construction schedule has not been finalized, so we assess a range of years for the cable installation scenarios, and report a range of values for exposure that reflect Project 1 export cable installation dates during the time period between 2027 and 2031 and Project 2 cable installation dates between 2030 and 2034, discounted to 2024$ at 5%.

Table 10 summarizes the baseline values and footprint assumptions on which the commercial fishing exposure calculations are based.

Table 10. Baseline values for commercial fishing exposure calculations.

Category	Baseline landed value ($2024/km^2/year)	Export Cable route length (km)	180 m ECA footprint (km^2)	1.6 km ECRA footprint (km^2)
Finfish (Area 539)	$18,200	34	6.12	54.4
Shellfish (Harvest Areas)	$43,800	34	6.12	54.4
Mantis shrimp (Mt. Hope Bay)	$25,200	4	0.72	6.4

For access constraints, we assume conservatively that all commercial fishing is prevented during the two months of cable installation in 20% of the 1.6 km ECWA, and in all of the 180 m-wide ECA. In 2024, the associated landed value is $171,000, including $48,000 from Finfish, $115,000 from Shellfish, and $8,000 from mantis shrimp.

The habitat disruptions that impact non-mobile benthic species are likely to extend on average no more than 5-10 m on either side of the immediate cable route – at most 12% of the ECA and 2% of the ECWA area. To be conservative, we assume a 20% reduction in landings of all shellfish (including mantis shrimp) for two years from the ECA (availability). In 2024, the associated landed value (forgone landings in 2025 and 2026) is $106,000, including $99,000 from Shellfish and $7,000 from mantis shrimp.

We do not expect any constraints on fishing along the export cable during SouthCoast Wind project operations. As discussed during the May 5, 2025 and May 22, 2025 meetings of RI CRMC, RI FAB, SouthCoast Wind, and WHOI, the target cable burial depth within the export cable corridor is 4 to 6 ft below seabed, which means that fishing above the cable route can continue as before. There may be limited, localized areas where the export cable needs to cross existing pipelines in the Sakonnet River and target burial depth may not be achieved – in these areas, the preferred secondary protection method is use of articulating cable mattresses with tapered edges. Cable mattress design, in tandem with other industry best practices, will ensure the cable is protected from external forces and will reduce the risk of potential gear hangs for mobile bottom tending fishermen operating in the area.

After approximately 35 years of operations, SouthCoast Wind plans to decommission the project and remove the export cables. Because removal of the cable involves less disruption of the seabed, we model the same type of constrained access and availability exposure as during installation, but with half the exposure impact.

In 2024, the resulting exposure estimate is $277,000 in landed value from cable installation and $25,000 from cable decommissioning (2024$). Because the dates of Project 1 construction and cable installation are not yet known, we show in Table 11 results in 2024$ for cable installation taking place in Q4 of each year from 2027 to 2031. Table 12 shows corresponding values for the Project 2 cable.

Table 11. Project 1 cable commercial fishing exposure estimates.

Cable installation year[1]	**Exposure landed value** (2024$)	**Indirect and induced value** (2024$)	**Total exposure impact** (2024$)
2027	$260,832	$241,792	$502,624
2028	$248,412	$230,278	$478,690
2029	$236,583	$219,312	$455,895
2030	$225,317	$208,869	$434,186
2031	$214,588	$198,923	$413,510

Notes: 1/ Cable installation is anticipated to take approximately two months. Because of uncertainty in the SouthCoast Wind construction schedule, we calculate the present value of exposure for a range of cable installation scenarios.

Table 12. Project 2 cable commercial fishing exposure estimates.

Cable installation year[1]	**Exposure landed value** (2024$)	**Indirect and induced value** (2024$)	**Total exposure impact** (2024$)
2030	$ 225,317	$ 208,869	$ 434,186
2031	$ 214,588	$ 198,923	$ 413,510
2032	$ 204,369	$ 189,450	$ 393,819
2033	$ 194,637	$ 180,429	$ 375,066
2034	$ 185,369	$ 171,837	$ 357,206

Notes: 1/ Cable installation is anticipated to take approximately two months. Because of uncertainty in the SouthCoast Wind construction schedule, we calculate the present value of exposure for a range of cable installation scenarios.

Exposure of for-hire charter fishing

We assume that for-hire charter fishing activity along the Rhode Island portion of the SouthCoast Export Cable Route is disrupted during two months of cable installation and decommissioning. Using the high-end estimate of charter fishing revenue (Table 9) of $29,400/year, we obtain the Project 1 cable exposure values for charter fishing shown in Table 13, and the Project 2 cable values in Table 14.

Table 13. Project 1 cable for-hire charter fishing exposure estimates.

Cable installation year[1]	**Exposure landed value** (2024$)	**Indirect and induced value** (2024$)	**Total exposure impact** (2024$)
2027	$ 4,616	$ 2,871	$ 7,488
2028	$ 4,397	$ 2,735	$ 7,131
2029	$ 4,187	$ 2,604	$ 6,792
2030	$ 3,988	$ 2,480	$ 6,468
2031	$ 3,798	$ 2,362	$ 6,160

Notes: 1/ Cable installation is anticipated to take approximately two months. Because of uncertainty in the SouthCoast Wind construction schedule, we calculate the present value of exposure for a range of cable installation scenarios.

Table 14. Project 2 cable for-hire charter fishing exposure estimates.

Cable installation year[1]	**Exposure landed value** (2024$)	**Indirect and induced value** (2024$)	**Total exposure impact** (2024$)
2030	$ 3,988	$ 2,480	$ 6,468
2031	$ 3,798	$ 2,362	$ 6,160
2032	$ 3,617	$ 2,250	$ 5,867
2033	$ 3,445	$ 2,143	$ 5,588
2034	$ 3,281	$ 2,041	$ 5,322

Notes: 1/ Cable installation is anticipated to take approximately two months. Because of uncertainty in the SouthCoast Wind construction schedule, we calculate the present value of exposure for a range of cable installation scenarios.

Conclusions

Baseline commercial landed value from Rhode Island state waters around the SouthCoast Wind Brayton Point Export Cable include an estimated $18,200/km^2/year from finfish, $43,800/km^2/year from shellfish in Rhode Island Shellfish Harvest Areas, and $25,200/km^2/year from mantis shrimp in the Rhode Island portion of Mt. Hope Bay (all values in 2024$).

Baseline Rhode Island-based for-hire charter fishing revenue from the SouthCoast Brayton Point Export Cable Area is estimated to be up to $29,400/year (2024$).

Based on an approximate two-month cable installation schedule for the sections of the SouthCoast Wind Project 1 Brayton Point Export Cable in Rhode Island waters, we estimate conservatively a total exposure of Rhode Island commercial landings present value (2024$) of $215,000 (2031 cable installation) to $261,000 (2027 cable installation). The corresponding values for charter fishing revenue are $3,800 and $4,600.

Including indirect and induced (onshore) effects, total exposure impact from the Project 1 cable is estimated to be $414,000 (2031 cable installation) to $503,000 (2027 cable installation) for commercial fishing, and $6,200 to $7,500 for charter fishing.

Similarly, based on an approximate two-month cable installation schedule for the sections of the SouthCoast Wind Project 2 Brayton Point Export Cable in Rhode Island waters, we estimate conservatively a total exposure of Rhode Island commercial landings present value (2024$) of $185,000 (2034 cable installation) to $225,000 (2030 cable installation). The corresponding values for charter fishing revenue are $3,300 and $4,000.

Including indirect and induced (onshore) effects, total exposure impact from the Project 2 cable is estimated to be $357,000 (2034 cable installation) to $434,000 (2030 cable installation) for commercial fishing, and $5,300 to $6,500 for charter fishing.

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Appendix

Table A1. Species landed in Area 539, "finfish" dataset, average annual value and pounds 2008-2021.

Species	Value (2024$/year)	Landings (lbs/year)
SKATES, RAJIDAE (FAMILY)	12,451,802	4,768,040
FLOUNDER, SUMMER	2,990,152	625,922
LOBSTER, AMERICAN	2,304,823	308,682
SKATE, LITTLE	1,951,038	738,134
WHELK, CHANNELED	1,901,474	196,196
SQUID, LONGFIN LOLIGO	1,464,872	862,705
SCUP	871,524	1,029,575
GOOSEFISH	868,701	340,187
SCALLOP, SEA	707,556	54,795
BASS, BLACK SEA	584,665	111,497
BASS, STRIPED	513,874	91,254
HERRING, SEA, ATLANTIC	492,320	2,820,082
FLOUNDER, WINTER	486,074	157,428
HAKE, SILVER	432,297	655,257
FLOUNDER, YELLOWTAIL	370,870	150,149
COD, ATLANTIC	229,327	63,459
BLUEFISH	170,207	187,631
BUTTERFISH	163,863	176,955
CRAB, JONAH	113,464	117,299
MACKEREL, ATLANTIC	97,812	274,436
TAUTOG	74,975	18,518
SHARK, DOGFISH, SPINY	64,754	233,414
HAKE, RED	62,009	168,822
SKATE, WINTER	57,656	279,180
BONITO, ATLANTIC	24,907	8,006
CRAB, ROCK, ATLANTIC	17,905	25,268
CRAB, HORSESHOE	15,089	8,601
SHARK, DOGFISH, SMOOTH	11,962	15,051
WHELK, KNOBBED	8,241	2,241
MENHADENS	5,262	14,947
EEL, CONGER	4,812	5,576
SEAROBINS	3,689	9,239
FLOUNDER, WITCH	2,774	848
TRIGGERFISHES	2,440	926
TRIGGERFISH, GRAY	2,425	1,302
FLOUNDER, WINDOWPANE	2,190	2,961
CRAB, GREEN	1,706	642

CUNNER	1,214	437
HADDOCK	1,032	787
CRAB UNKNOWN	788	300
SEATROUT, WEAKFISH	694	266
HAKE, WHITE	615	503
SEAROBIN, STRIPED	551	206
TUNA, YELLOWFIN	548	205
TILEFISH, GOLDEN	493	220
RAVEN, SEA	356	194
EEL, AMERICAN	285	221
COBIA	243	63
SHAD, HICKORY	210	297
TUNA, BIGEYE	137	52
DOLPHINFISH	85	57
KINGFISH, NORTHERN	82	68
SEATROUT, SPECIES NOT SPECIFIED	74	121
DORY, AMERICAN JOHN	73	93
DRUMS	60	23
TUNA, ALBACORE	39	23
SQUID, SHORTFIN ILLEX	19	37
POLLOCK	16	11
MACKEREL, SPANISH	6	2
MACKEREL, ATLANTIC CHUB	2	3

Total Impacts Crosswalk

		WHOI Total Impacts	Guilfoos Total Impacts
	Commercial ($2024)	$533,491.00	$684,860.00
	Recreational ($2024)	-	$135,000.00
	Charter ($2024)	$7,966.67	$7,966.67
	Decommissioning ($2024) Discounted 5%	$37,890.05	$48,640.70
Total	2-month impact	$579,347.71	$876,467.37
Guilfoos adjustment	2-month and 1 week	-	$986,025.79
Project 1 + Project 2	($2024)	$1,158,695.43	$1,972,051.58

For clarity I have put the dollar values of both projects in 2024 USD for comparison before we consider the timing of the projects in relation to impacts. I note, and will correct, that I made an error in respect in my draft report for charter business by overstating the impact to charter fishing business. I adopt the estimates of WHOI based on their analysis and put it in 2024 dollars for comparison.

As noted in my draft report that WHOI discounted each project from dates when expected approval may occur to 2024, creating a lower impact. As discussed previously this does not make sense because compensation will be provided in the future and essentially penalizes the fisherman as if they already received funds in 2024. Differences in timing and the inflation rate used to adjust timing can make a large difference in impacts.

Instead of projecting out what inflation will be, I suggest using a CPI adjustment applied to the 2024 values for impacts and mitigation. In practice this would mean that if Project 1 were adjusted for inflation in 2025, my impact estimate is $986k would be inflated by 2.7%(CPI for 2025) and compensation would be $986 x 1.027 = $1,012k. For comparison the WHOI estimate would be $579k x 1.027 = $595k. In my revised report I will not make this projection but include my suggestion that these should be adjusted by the CPI. Note that inflation historically tends to be around 2.5-3.5% in the long-run, in practice it could be higher or lower.

If using the same methodology and Project 1 closed in 2030 and Project 2 closed in 2032, and assuming that inflation would be 3% annually for 2026 onward. My estimate would suggest Project 1 (inflating for 2026, 2027, 2028, and 2029 inflation) would be valued at 1.03^4 x $1.027k =$1,139k in paid in 2030 and Project 2 (inflating for 2026, 2027, 2028, 2029, 2030, and 2031 inflation) would be valued at 1.03^6 x $1.027k =$1,209k if paid in 2032.

For comparison the WHOI estimates adjust for a 3% inflation rate would be $669k for Project 1 in 2030 and $710k for Project 2 in 2032.

SouthCoast Wind Cable Corridor Fisheries Economic Impact (Draft)

May 3, 2026

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Summary

This report addresses the economic exposure estimates produced by report by Kite-Powell et al. (2025), called the WHOI report hereafter, of cable construction in Rhode Island state waters for the SouthCoast Wind Project. There are six sections of this report. A discussion of the overall methods and estimates of the WHOI report. Supplemental data and estimates of economic exposure from cable construction that differ from the WHOI report. A discussion of timing estimates for boulder clearing, cable laying, and surveying. An estimate of recreational fishing impacts. A discussion of additional risks that are difficult to estimate, and a conclusion. There are two projected cable construction projects that will go through Rhode Island state waters, with impacts felt in two different years. The total impact of both construction projects is estimated to be $2,318k based on inflation projections.

1 Review of the WHOI Report:

The basis of economic estimates from the WHOI report uses annual catch estimates in AREA 539 and specific adjustments are made for finer scale information in conjunction in consultation with the RI DEM. The report uses a 5% discount rate to bring impacts to a common 2024-dollar value using averages of past catch in state waters. Further, the report scales impacts of activities to a construction impact of 2 months along the cable route, 180m around the cable, and a broader impact of 20% decrease in landings1600m in distance from the planned cable.

WHOI estimates of average annual value of commercial landings from Rhode Island State waters are reproduced here in Table 1

Table 1. WHOI Commercial Two Month Estimates in Cable Corridor in RI State Waters ($2024).

	Cable Direct Impacts (ECA & ECRA)	Total (Direct, Induced, & Indirect)
Finfish	$ 47,854	$ 92,214
Shellfish Harvest Areas	$ 214,480	$ 413,302
Mantis Shrimp	$ 14,518	$ 27,975
Total	$ 276,851	$ 533,491

Annual exposure estimates are scaled for 2 months during the year of construction on the cable route, defined as a 180m wide lane surrounding the export cables, then an additional broader

impact in the Export Cable Route Area 1,600m. This produces the estimates in Table 1 column 1. The methodology is sound for fisheries that do not have an oversized spatial representation in the cable corridor, such as whelk and mantis shrimp and in which fishing methods are not impacted by congestion around the cable and other physical features, such as islands in Mount Hope Bay.

I find elements of the WHOI report that are reasonable in my estimation. Such as the impact on charter business, which is supported with a survey. The estimation of finfish exposure, while I disagree with the methodology as discussed above based on seasonality and spatial distribution, I do think the estimates are reasonable. The methodology and estimates of upstream and downstream economic impacts are both reasonable. Additionally, based on discussions with RI DEM, WHOI adjusted shellfish estimates reasonably to account for their spatial concentration in the Sakonett River.

The fisheries that I believe to be underrepresented in the report are mantis shrimp and recreational fishing. I discuss below and provide supplemental estimates for these fisheries in section 2.

I believe that having estimated impacts for commercial and charter fisheries but not for recreational fisheries is inconsistent. Looking at the academic literature for recreational fishing value there are many variables that suggest location is key to the value of recreational fishing (McConnell, 1995; Hunt, 2008). Both studies and many other fishery studies use location as a key component in valuation of visiting a site for recreational value. The limitation of locations therefore should have some economic value. Location is a key metric that is used to value one site over another as it is related to the availability of targeted species and the opportunity cost to travel to the area.

From personal communications (FAB member interviews) that Mantis Shrimp for one vessel in Mount Hope Bay along the cable corridor can result in ~$3,500 for one trip in October, I find the estimates in the WHOI report to be an underestimation of impacts for this species.

2 Supplemental Estimates:

Two of the specific fisheries that are most likely to be impacted are the mantis shrimp fishery, whelk based on location. The spatial distribution of effort in these fisheries is concentrated in the cable corridor. As discussed before the seasonality of the fisheries is important, October and November being very productive months for both of these species. Using the assumption that work will take place after October 15th and take 2 months we can estimate similar baseline estimates to those of the WHOI report. I only provide estimates for mantis shrimp below in supplement as I agree with the adjustments made for whelk by the WHOI report- without considering timing of impacts.

Mantis Shrimp:

Based on the latest reporting from RI DEM (2025 mantis shrimp landings) and taking into consideration there is underreporting of at least 40% (6 vessels reported landings while at least 10 vessels fish mantis shrimp) I estimate 2025 annual landings $580,975 in RI State waters. In consultation with the RI FAB (RI FAB interview) the fishery experienced a relatively poor year, making this estimate which suggests it is a lower bound. The majority of this value is landed in Mount Hope Bay and ~50% of this is landed in September and October and around ~15% is landed in November to December. Assuming that construction runs from October 15th to December 15th this leads to weighted exposure of 27.5% of the annual catch. I assume 80% of catch comes from Mount Hope Bay, and that 75% of the landings are lost due to loss of access in the Bay. The loss of access is based on the patterns of mobile gear fishing that will be greatly disrupted while boulder removal and cable laying occur. In 2024 dollars given spatial restrictions I estimate $93,068 is directly impacted by cable construction due to loss of access to the area in late October through December (2 months).

Commercial Adjustments:

Adopting the IMPLAN (IMPLAN, 2004) combined multiplier of 1.927 to the direct impacts of mantis shrimp discussed above I provide a comparison of total estimates (direct + induced + indirect) in Table 2.

Table 2. Adjusted Two Month Exposure Estimates in the Cable Corridor in RI State Waters ($2024).

	WHOI Total Impacts	Guilfoos Total Impacts
Finfish	$ 92,214	$ 92,214
Shellfish Harvest Areas	$ 413,302	$ 413,302
Mantis Shrimp	$ 27,975	$ 179,343
Total	$ 533,491	$ 684,860

3 Recreational Fisheries:

As mentioned before, the WHOI report assumes that there is no impact to recreational fisheries because there are alternative sites to visit during construction. While time of year restrictions may reduce the impact, I disagree that alternative recreational sites lead to no impact on recreational fishers. Given the expected construction would take place in October – December time frame there would be impacts to recreational fishers targeting species in that season. While a full study of the recreational fisheries is needed to get the most accurate estimate of impacts, that is not possible here. I use aggregate data to form a rough estimate of impacts on the recreational fishers. There are an estimated 1,018,088 annual trips on average using private or rental boats in Rhode Island state waters from 2014-2024 based on Marine Recreational Information Program (MRIP) data (NOAA Fisheries (A), 2026). I leverage the survey on charter boats done by WHOI, which I assume to be highly correlated with recreational fishing trips. Roughly 8% of trips in the WHOI survey intersected with the Brayton Cable corridor. This

suggests 81,000 trips are impacted annually in the cable corridor. Using estimates of 2 months of disturbance for construction and discounting trips by 50% given the time of year I estimate 6,787 impacted trips. Based on the 2023 NOAA estimates of Value-added economic impact per trip (NOAA Fisheries (B), 2026) this suggests a $135,000 total economic exposure to the recreational fishery in 2024 dollars. This estimate is very sensitive to time of year and types of fish targeted. For instance, if construction (boulder clearing and cable laying) is limited to January and February this estimate may be an overestimate. Yet, if impacts are felt in September, then this may be an underestimation.

4 Timing Concerns:

When these impacts occur is incredibly important to fisheries. Dredging permits are issued for work starting October 15th on this project. If impacts occur through surveying or boulder moving before October 15th this would substantially impact on these estimates of exposure to fisheries.

Why this is particularly important to this area is that mantis shrimp fishery catches 50% of its annual landings from mid-September to mid-October (FAB Interview). Whelk are harvested primarily in October and November making up 44% of the annual landings (RIDEM 2021). October is the most prosperous month for both fisheries. Estimates of one vessel-day for a vessel targeting mantis shrimp are approximately $3,500 in mid-October (RI FAB Interview). There are approximately 10 vessels that primarily target mantis shrimp and another 10 vessels that participate in the fishery on a part-time basis. A vessel targeting whelk can expect $1,500 per day in mid-October (RI FAB Interview). The depression of price has decreased the value of whelk landings compared to previous years. There are approximately 93 vessels that reported whelk landings in 2020 (RI DEM, 2021) and an average $155 value of landings per trip.

Each additional day of fishing disruption could lead to substantially higher impacts to both these fisheries of ~$35,000/day for mantis shrimp and ~$15,000/day for whelk.

The WHOI report cites a 66-day window for cable related construction, which is meant to be a conservative estimate of fishery impacts. Using the case of the Revolution Wind cable construction that was installed in Fall 2024-Winter 2025 is useful to set a baseline of an actual timeline. It is recognized that this project construction may differ substantially from the Revolution cable installation. I have constructed from Mariner's Briefings the approximate timeline of impacts when the briefing mentions near shore and mid-shore restrictions on fishery vessels. The Mariner Briefings occur weekly. These briefings show that boulder clearing occurred from September 15 to October 31st for a 6-week period. Then cable laying and burying and secondary coverage occurred from December 10th to February 12th, for 8 weeks. After cable installation and secondary cover then, additional surveys occurred along the cable corridor. There were 3 to 4 months of fishery impacts, excluding the breaks between construction.

To adjust for the differences of timing I have included 1-week of additional impact in Table 3.

Table 3 summarizes the total impact of one construction disturbance for a cable construction and burial, with a comparison to the WHOI estimates in 2024 USD for comparison. In the next section I will consider the future value of projects by their expected closing dates.

Table 3. Total Impacts Crosswalk

		WHOI Total Impacts	Guilfoos Total Impacts
	Commercial ($2024)	$533,491	$684,860
	Recreational ($2024)	-	$135,000
	Charter ($2024)	$7,966	$7,966
	Decommissioning ($2024) Discounted 5% for 35 Years	$48,358	$62,079
Total	2-month impact	$589,816	$889,905
Guilfoos adjustment	2-month and 1 week	-	$1,001,144

Discounting:

The above values in Table 3 are in 2024 dollars. The WHOI report uses a 5% discount rate and projects decommissioning occurs 35 years after construction, which I also adopt. There are a series of Tables in WHOI report (Tables 11-14) that explore different timing of construction and discounted values of impacts. These discounted values assume that between 2024 and when construction occurs that impacts are discounted at 5% a year because impacts will be felt further in the future. While that element is true, it does not account for the value of money and who is holding the trust money during that time. The Fisherman's Viability Trust will be funded once the SouthCoast Wind projects receive all approvals at the local, state, and federal level. 2024 level impacts should be adjusted for inflation for when the trust is funded, which is when construction will occur.

The above only holds if money is transferred to the trust after approvals are made and then construction occurs upon approvals. I would agree to the analysis in the WHOI report if money is transferred in 2024 and the delay in impacts is felt further in the future, justifying discounting those impacts. Otherwise, fisherman lose out in the purchasing power of money lost through inflation as impacts will be felt at future prices and are penalized unnecessarily for time discounts.

To adjust these values to expected closing dates we must consider the expected dates of Project 1 and Project 2. Project 1 is for the first cable construction process that will occur sometime between 2027 and 2031- with a midpoint of 2029. Project 2 is for a second cable construction

process in the same cable corridor through the Sakonett River and Mount Hope Bay. Project 2 will occur between 2030 and 2034 with a midpoint of 2032. Since these are two separate construction events that happen at different expected times, they must be adjusted to their expected dates for inflation. I project inflation from 2024 to the midpoint dates for each project using actual inflation in 2025 (2.7%), current inflation for 2026 (3.3%)[1], and a 30 year long run average of CPI for the remaining years (which is 2.5%)[2].

Table 4. Inflation Adjustments

	Value
Total for Each Project ($2024)	$1,001,144
Project 1 - 2029 Approval	$1,115,873
Project 2 - 2032 Approval	$1,201,674
Sum of Project 1 & Project 2	$2,317,547

In Table 4 I report on the value of the two construction projects with inflation projections to their expected closing dates. Project 1 is valued at $1,115k and Project 2 is valued at $1,201k based on closing dates of 2029 and 2032. These projections inflate the values from 2024 to Jan 1st, 2029, and Jan 1st, 2032. With a long-term inflation adjustment of 2.5% these estimates would be an overestimate if closing occurred earlier and underestimate if closing occurred later, as payment to the Viability Trust would also change.

5 Additional Unquantified Risks:

Some additional risks that the commercial fishing industry assumes from this project which are difficult to quantify and are not included in the WHOI baseline exposure, presumably due to the difficulty in knowing the probability of occurring and uncertainty around construction details. Fouling of gear on unburied cables and secondary coverage is one such risk. It is expected that all mattress pads laid over exposed cables are trawlable. Yet risk of snags still exists which are costly to vessels in terms of time and damaged gear. Another long-term risk is how the bottom will change with moved boulders and changed habitat which may take adjustment to mobile gear fisheries. Well established 'runs' in Mount Hope Bay may be altered if the bottom changes significantly which could have long run impacts to the shrimp and scup fisheries. This may decrease the profitability of trips to that area in the future during operations. Construction activities could affect species distribution or health. An alternative site for mantis shrimp in the West Passage of Narragansett Bay has become unproductive after the cable construction (FAB Interview). It is unclear whether cable construction is responsible for this decrease.

[1] Inflation for 2026 is unknown but for March it is 3.3% and expected to increase in the near term. I use 3.3% for the year to recognize this inflationary pressure.

[2] I use the CPI all cities inflation index available form the Bureau of Labor Statistics between 1996 and 2026 to estimate long term expected inflation of 2.5%.

6 Conclusion:

The significant differences between my estimates and the WHOI report in expected impacts come from four sources: 1) the timing of payments 2) the exclusion of recreational fisheries, 3) mantis shrimp, and 4) the duration of fishery impacts.

My estimate of the impact of one cable construction period in 2024 dollars is $1,001k. Using inflation projections, the value of the two construction periods is $1,115k for Project 1 and $1,201k for Project 2 based on closing dates of 2029 and 2032. The total impact of both construction projects is estimated to be $2,318k based on inflation projections.

These estimates are made with the best information available and may be over/under estimates based on missing reported catch, changes in inflation, unprojected impacts to fishing during operations of the cable that are difficult to estimate or unknown at this time.

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