

#	Tetra Tech's Comment to Proposed Rule
1	<p>Will RI state regulations help to ensure offshore wind cables are not excluded from using the corridor and support coordination among multiple developers working to bring clean renewable power to the region? Will RI CRMC help with the necessary coordination of cable placement if a situation arises for strategic planning to accommodate multiple projects' cables?</p> <p>Certain portions of the corridor could be too narrow if multiple developers seek to use it - this may be manageable with coordination of cable placement within corridor but without coordination in this regard it could easily result in a "first across the line" situation.</p>
2	<p>What are the plans and timing for definition of the referenced Sakonnet River corridor?</p>
3	<p>Is it correct to assume that any areas slightly outside of the designated cable corridor where temporary impacts may occur (i.e. from anchoring during cable installation) are permissible as long as the entire area is also appropriately surveyed to BOEM, RI CRMC, and RIHPHC requirements prior to construction?</p>
4	<p>Section 1.3.1(S)(2)(g)(4): "...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." This requirement is not clear - can examples be provided? Are specific materials considered "biologically-friendly" and others not?</p>
5	<p>Section 1.3.1(S)(2)(h)(1): Suggest that the developer can be provided with an opportunity to submit a revised monitoring plan to CRMC after Year 2 surveys (in line with recent BOEM rulings - reference South Fork DEIS conditions). This will allow for the long-term monitoring plan to be based on the installed conditions. Additionally, this provides for the potential opportunity to utilize technology such as Distributed Temperature Sensing (DTS) or similar to allow for more-frequent remote sensing of cable burial, which may reduce future vessel operations (and associated impacts) to as low as reasonably practicable.</p>
6	<p>Section 1.3.1(S)(2)(h)(2): As with above comment - suggest that EMF surveys after Year 2 be on an as-needed basis if cable unburial or abnormal EMF level is detected.</p>
7	<p>Can it be assumed that deviations from the cable corridor in specific locations and environmental conditions to increase likelihood of safe and successful cable installation and maintenance or to allow for consideration of a wider range of landfall alternatives will be acceptable with CRMC as long as the entire area is also appropriately surveyed to BOEM, RI CRMC, and RIHPHC guidelines/recommendations prior to construction?</p>