

Appendix D2. Rhode Island Coastal Zone Management Act Consistency Certification

Document Revision

С

Issue Date

October 2023



SOUTHCOAST WIND

Prepared for: SouthCoast Wind Energy LLC

Rhode Island Coastal Zone Management Act Federal Consistency Certification – Brayton Point POI

Prepared by:

AECOM 9 Jonathan Bourne Drive Pocasset, MA 02559

October 2023



Quality Information

Prepared by	Approved by	
Sherri Albrecht	Nancy Palmstrom	
Sr. Regulatory Ecologist	Project Manager	

Revision History

Revision	Revision date	Details	Authorized	Name	Position
0	8/29/2021	Submittal	Yes	Nancy Palmstrom	Project Manager
1	3/16/2022	Revised in response to CRMC comments	Yes	Nancy Palmstrom	Project Manager
2	10/26/2023	Revised in response to CRMC comments	Yes	Kyle Cassidy	Marine Science Permitting Manager

Prepared for:

Jennifer Flood SouthCoast Wind Energy LLC 101 Federal Street Boston, MA 02110

Prepared by:

AECOM 9 Jonathan Bourne Drive Pocasset, MA 02559 aecom.com

Copyright © 2022 by AECOM

All rights reserved. No part of this copyrighted work may be reproduced, distributed, or transmitted in any form or by any means without the prior written permission of AECOM.

Table of Contents

Acrony	/ms and Abbreviations	ii
1.0 l	/ms and Abbreviations ntroduction	1-1
1.1	Project Objectives	1-1
1.2	Regulatory Applicability	1-2
	Necessary Data and Information	
2.0 F	Project Information	2-1
2.1	Project Timeline	2-1
2.2	Project Overview	2-1
2.3	Specific Project Details	2-1
2.4	Alternatives Considered	
2.5	Affected Environment	2-3
2.6	Potential Project Impacts	2-3
2.7	Avoidance, Minimization, and Mitigation Measures	2-4
	Rhode Island Coastal Program Policies	
4.0 0	Consistency Certification	4-1
Attachr	ment 1 – Figures	Att 1-0

Tables

Table 1-1. Necessary Data and Information	. 1-3
Table 2-1. Key Project Details	. 2-2
Table 3-1. Enforceable Policies of the CRMP	

Figures

Figure 1. Overview of SouthCoast Wind Offshore Renewable Energy Generation Project	Att <u>1-1</u>
Figure 2. Location of the Brayton Point ECC within the Rhode Island GLD Boundaries	Att 1-2
Figure 3. Areas of Concern and Areas to Avoid within Rhode Island GLD Boundaries	Att 1-3
Figure 4. Glacial Moraines and Fishing Areas within the Rhode Island GLD Boundaries	Att 1-4
Figure 5. Marine Archaeology (Shipwrecks and Obstructions) within the Rhode Island GLD	
Boundaries	Att 1-5
Figure 6. Shipping Lanes within the Rhode Island GLD Boundaries	Att 1-6
Figure 6. Shipping Lanes within the Rhode Island GLD Boundaries Figure 7. Vessel Activity in the Rhode Island GLD Boundaries	
	Att 1-7

Acronyms and Abbreviations

Abbreviation or Acronym Definition

BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
СОР	Construction and Operations Plan
CRMC	Coastal Resource Management Council
CRMP	Coastal Resource Management Program
CZMA	Coastal Zone Management Act
ECC	Export Cable Corridor
EO	Executive Order
ft	foot/feet
GLD	Geographic Location Description
ha	hectare
HDD	Horizontal Directional Drilling
HVDC	High Voltage Direct Current
HPHC	Rhode Island Historical Preservation & Heritage Commission
km	kilometer
kV	kilovolt
m	meter
mi	mile
nm	nautical mile
NOAA	National Oceanic and Atmospheric Administration
OCS	Outer Continental Shelf
OER	Office of Energy Resources (Rhode Island)
OSP	Offshore Substation Platform
POI	Point of Interconnection
PPA	Power Purchase Agreement
RGGI	Regional Greenhouse Gas Initiative
RICR	Rhode Island Code of Regulations
SAMP	Special Area Management Plan
SAV	Submerged Aquatic Vegetation
SouthCoast Wind	SouthCoast Wind Energy LLC
UXO	Unexploded Ordinance
USC	United States Code
WTG	Wind Turbine Generator

1.0 Introduction

SouthCoast Wind Energy LLC (SouthCoast Wind) proposes an offshore wind renewable energy generation project (the Project) located in federal waters off the southern coast of Massachusetts in the Outer Continental Shelf (OCS) Lease Area OCS-A 0521 (Lease Area). The Project will deliver electricity to the regionally administered transmission system from the Lease Area at up to two points of interconnection (POI); Falmouth Tap in Falmouth Massachusetts, and Brayton Point in Somerset Massachusetts via offshore export cables as well as onshore transmission systems extending to the respective POIs (Figure 1).

The offshore export cable corridor (ECC) for the Brayton Point POI will extend from the Lease Area in federal waters and into Rhode Island state waters (Sakonnet River), cross over Aquidneck Island, and reenter Rhode Island State waters (Mount Hope Bay), before entering waters of the Commonwealth of Massachusetts and ending in Somerset, Massachusetts, at Brayton Point (Figure 2).

This Coastal Zone Consistency Certification is specific to the portions of the Brayton Point export cable corridor (ECC) within the Rhode Island 2011 and 2018 Geographic Location Descriptions (GLDs). SouthCoast Wind expects to separately submit a CRMC Category B State Assent application(s) for the portion of the Brayton Point ECC through Rhode Island state waters. Construction and Operations Plan (COP) Revised Appendix D1 (Massachusetts Coastal Zone Management Act Consistency Certification) covers the remaining portions of the Project. Portions of the Project located within federal waters outside of the GLDs are not addressed by this Consistency Certification.

It should be noted that certain studies and analyses are ongoing which are needed to provide necessary demonstrations for compliance with one or more enforceable policies. SouthCoast Wind has identified in Section 3, where additional information will be provided, and the expected demonstrations that will be made once those data are available.

1.1 Project Objectives

The Project's objective is to provide Massachusetts and neighboring New England states in the region, including Rhode Island, with clean, renewable wind energy. SouthCoast Wind was awarded power purchase agreements (PPAs) for a total of 1,209 megawatts (MW) through Massachusetts offshore wind generation competitive solicitations conducted pursuant to Rounds II and III of Section 83C of c. 169 of the Acts of 2008 et seq., as amended by the Energy Diversity Act, c. 188 of the Acts of 2016 and the Act Driving Clean Energy and Offshore Wind, c. 179 of the Acts of 2022 (Section 83C), and thus has demonstrated its ability to secure awarded PPAs. The Company terminated these existing PPAs because they have become uneconomic due to unforeseen macroeconomic developments affecting the offshore wind industry. As of September 29, 2023, the agreements to terminate Massachusetts PPAs were approved by the Massachusetts Department of Public Utilities (DPU), thereby enabling the Project to compete in the upcoming Rhode Island, Connecticut, and Massachusetts solicitations for up to six gigawatts of offshore wind power. SouthCoast Wind fully expects to have PPAs in place for the full amount of the Project's capacity before significant construction commences.

There are several significant economic, environmental, and social benefits to offshore wind power, including the generation of electricity that does not emit air pollutants and that can replace other more environmentally costly forms of electricity generation. The Project is expected to help achieve environmental and clean/renewable energy goals for the region, including eliminating at least 1.6 million metric tons of CO₂ emissions annually once in operation — the equivalent of taking 347,968 cars off the road per year¹. The generation of clean renewable energy will reduce the need for greenhouse gas emitting electricity generation which will contribute to a reduction in the harmful effects of climate change such as sea level rise and ocean acidification both of which pose significant harm to the human and natural environment of the New England coastline. Additionally, the Project is expected to bring significant employment and other economic benefits to

¹ Daymark Energy Advisors. (2021). Massachusetts 83C-III Benefits Report: Mayflower Wind Proposal A. Prepared for Mayflower Wind Energy, LLC. (2021, September 16).

southern New England. It should be instrumental in creating a thriving, utility scale, domestic offshore wind industry.

In the "Offshore Renewable Energy and Other Offshore Development" Policy² of the Rhode Island Ocean Special Area Management Plan (SAMP), the Rhode Island Coastal Resources Management Council (CRMC) acknowledges support for increasing renewable energy production in Rhode Island provided the offshore development is consistent with the goals of the Ocean SAMP. The Project will produce a viable form of renewable energy for southern New England and be a key addition to existing energy mix of the region. The Rhode Island State Energy Plan "Energy 2035"³ (released in 2015) identifies offshore wind as one of the most significant resources for wind energy available to the State. In addition, the Project complements Rhode Island °s "Lead by Example" Executive Order (EO 15-17⁴), in which the Governor tasked the Rhode Island Office of Energy Resources (OER) to identify opportunities to support full transition toward renewable energy sources by 2025.

The 2021 Act on Climate bill signed by Gov. Dan McKee in April 2021 sets mandatory and enforceable targets for reducing greenhouse-gas emissions and transitioning to a low carbon economy. Under the Act on Climate, the State of Rhode Island will develop a plan to incrementally reduce climate emissions to net-zero by 2050. The plan will be updated every 5 years and will address areas such as environmental injustices, public health inequities and a fair employment transition as fossil-fuel jobs are replaced by green energy jobs. The 2021 Act specifically calls for the transition to a cleaner energy future to be just and equitable which includes replacing fossil-fuel-based jobs with renewable-energy jobs that pay prevailing wage delivering renewable energy at lower cost to families and businesses. The Act calls for the inclusion of environmental-justice populations and a process for environmental-justice communities to provide input on concrete plans that identify support for workers in the transition and the development of programs to recruit, train, and retain women, people of color, Indigenous people, veterans, formerly incarcerated people, and people living with disabilities in jobs related to a cleaner energy economy.

Specific environmental and socioeconomic benefits that the Project will provide include:

- The Project, as planned, is expected to be the region's single greatest contributor to achieving the emissions reduction goals outlined in the Regional Greenhouse Gas Initiative (RGGI) of the Eastern States of the U.S.; both Rhode Island and Massachusetts are members of the RGGI. Further, subject to potential future negotiated PPAs, the Project may also directly support achievement of Rhode Island's greenhouse gas targets for 2035 and 2050 as laid out in the Rhode Island Greenhouse Gas Emissions Reduction Plan⁵ (December 2016).
- 2. The Project is expected to bring significant employment and other economic benefits to the region, including creation of more than 11,280 full time equivalent jobs in the region during the operations, maintenance, and service phases of the Project from both direct, indirect, and induced employment opportunities.⁶

1.2 Regulatory Applicability

In compliance with the Federal Coastal Zone Management Act (CZMA, 16 United States Code [USC] 1451 et seq.), SouthCoast Wind has prepared this consistency certification for the Bureau of Ocean Energy Management (BOEM) to demonstrate compliance with the provisions identified as enforceable by the coastal zone management policies of the State of Rhode Island.⁷ Federal Consistency Regulations (15 Code of

² Rhode Island Ocean Special Area Management Plan (Title 650-Coastal Resources Management Council; Chapter 20 Coastal Management Program; Subchapter 05 – Ocean Special Area Management Plan; Part 11 - Policies of the Ocean SAMP (650 RICR-20-05-11)

³ "Energy 2035" Rhode Island State Energy Plan. Rhode Island Division of Planning. State Guide Plan Element Report #120. October 8, 2015. (Link: <u>http://www.planning.ri.gov/documents/LU/energy/energy15.pdf</u>)

⁴ https://governor.ri.gov/documents/orders/ExecOrder15-17.pdf

⁵ Rhode Island Greenhouse Gas Emissions Reduction Plan, published in December 2016 (Link:

http://climatechange.ri.gov/documents/ec4-ghg-emissions-reduction-plan-final-draft-2016-12-29-clean.pdf)

⁶ BVG Associates. (BVGA). (2021). Economic Benefits. A Technical Report to Support Mayflower Wind's Bid for Long-Term Contracts for Offshore Wind Energy Projects. (2021, August).

⁷ State of Rhode Island, Coastal Resources Management Council, Coastal Management Program, Part 1 – Red Book (650-RICR-20-00-1) and associated applicable policies. Available URL: <u>http://www.crmc.ri.gov/regulations.html</u>. Accessed June 30, 2021.

Federal Regulations [CFR] 930.00) require all Federal Actions that involve reasonably foreseeable effects on any land or water use or natural resource of a state's coastal zone to be consistent with all enforceable policies of the state's Coastal Zone Management Program. Federal Actions include the permitting of actions by private entities. This Project involves the installation of energy facilities on the OCS and therefore meets the definition of a Coastal Energy Activity under the CZMA (16 USC 1453 (5)(i)). The Project will require approval of the Construction and Operations Plan (COP) by BOEM and, subsequently, a Record of Decision issued by BOEM under the National Environmental Policy Act in response to a Final Environmental Impact Statement, and a permit from the United States Army Corps of Engineers pursuant to Section 404 of the federal Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899.

Within Rhode Island, the CZMA is administered within the coastal zone by the Rhode Island CRMC. The Rhode Island Coastal Zone includes the lands and waters within an area defined by the seaward limit of the state's territorial sea, to two hundred feet inland from any coastal feature, to watersheds, and to certain activities that occur anywhere within the state. In addition, consistency certification is required for federal authorizations for activities, including offshore wind facilities and underwater cables, proposed in federal waters designated as a geographic location description (GLD). National Oceanic and Atmospheric Administration (NOAA) has approved two GLDs for the State of Rhode Island, one in 2011 and the second in 2018. The 2011 GLD extends seaward 30 nautical miles (nm) from the shoreline and encompasses all waters beyond the seaward limit of Rhode Island state jurisdiction at 3 nm from the shoreline. The 2018 GLD includes a portion of the Massachusetts Wind Energy Area, BOEM lease blocks OCS-A 0500 and 0501, and an area of federal waters south of Martha's Vineyard and immediately north of the lease blocks where Rhode Island-based commercial fisheries operate.⁸

Project facilities to be located within the Rhode Island coastal zone, and thus within the jurisdiction of the CRMC, include the offshore ECC within the 2011 and 2018 GLDs as well as state waters and onshore export cables within Rhode Island (Figure 2). The SouthCoast Wind Lease Area (OCS-A 0521) falls outside of the GLDs. As noted above, this Consistency Certification addresses only those portions of the offshore ECC within the GLDs.

1.3 Necessary Data and Information

In addition to the enforceable policies of the State of Rhode Island identified and addressed in Section 3.0 of this report, the State considers certain background information on a proposed project in their decision-making process.⁹ This background and general Project information is summarized in this document and is described in detail within the COP developed by SouthCoast Wind and submitted to BOEM. Table 1-1 below provides details on the required information outlined within the Rhode Island CRMC Federal Consistency Manual (2018), and where that information can be found within this document as well as the COP.

This document is intended to provide background information on portions of the Project relevant to the CZMA to ensure consistency with all applicable regulations of the State of Rhode Island. Applicable review procedures are set forth at 650 Rhode Island Code of Regulations (RICR) Chapter 20 (see 650-RICR-20-00-1).

Project Information	Reference Section or Description
The name and location of the project	SouthCoast Wind Energy LLC; OCS Lease Area OCS- A 0521
A detailed description of the site, nature, and extent of the proposed activity and its associated facilities and services,	CZMA Consistency Certification Section 2.0 – Project Description (summary) CZMA Consistency Certification Attachment 1 (Figures) COP Section 1.1 – Project Overview COP Section 3.0 – Description of Proposed Activities

Table 1-1. Necessary Data and Information

⁸Rhode Island Coastal Resources Management Program, Accessed August 13, 2021:

http://www.crmc.ri.gov/news/2018_1218_jurisdiction.html

⁹ State of Rhode Island Coastal Resources Management Program Federal Consistency Manual (December 7, 2018 (Revised)).

Accessed July 28, 2021: http://www.crmc.ri.gov/regulations/Fed_Consistency.pdf

Project Information	Reference Section or Description
A detailed description and analysis of the project objectives and anticipated benefits	CZMA Consistency Certification Section 1.1 – Project Objectives CZMA Consistency Certification Attachment 1 (Figures) COP Section 1.3 – Purpose and Need
A detailed description of the physical, biological, chemical, economic, and social conditions of the project site, surroundings, and affected environment, including resource area delineations, illustrated with map(s) and site plan(s) depicting both existing and proposed conditions	COP Section 3.0 – Description of Proposed Activities COP Section 4.0 – Site Geology and Environmental Conditions COP Section 5.0 – Physical Resources COP Section 6.0 – Biological Resources COP Section 7.0 – Cultural Resources COP Section 10.0 – Socioeconomic Resources
A timetable and the methods and timing of construction and operation of the project (including types of equipment, temporary impacts associated with construction, monitoring and maintenance plans, proposed reporting schedule)	COP Section 3.2 – Proposed Project Schedule COP Section 3.3 – Project Components and Project Stages COP Section 3.4 – Summary of Impact-Producing Factors
A detailed description and assessment of the negative and positive potential coastal effects of the project	CZMA Consistency Certification Section 3.0 – Rhode Island Coastal Program Policies COP Section 5.1 Air Quality COP Section 5.2 Water Quality COP Section 6.1 Coastal and Marine Birds COP Section 6.2 Bats COP Section 6.3 Terrestrial Vegetation and Wildlife COP Section 6.4 Wetlands and Waterbodies COP Section 6.5 Coastal Habitats COP Section 6.6 Benthic and Shellfish COP Section 6.7 Finfish and Invertebrates COP Section 6.8 Marine Mammals COP Section 6.9 Sea Turtles COP Section 7.1 Marine Archaeology COP Section 7.2 Terrestrial Archaeology COP Section 7.3 Above-Ground Historic Properties
A detailed description of alternatives considered, analysis of the impacts on the resource areas, and justification as to why the preferred alternative was selected	COP Section 2.0 – Project Siting and Design Development COP Section 3.0 – Description of Proposed Activities CZMA Consistency Certification Attachment 1 (Figures)
A description of measures taken to avoid, minimize, and mitigate adverse coastal effects and a description of how the project meets applicable coastal program policies	CZMA Consistency Certification Section 3.0 – Rhode Island Coastal Program Policies COP Section 16.0 – Summary of Avoidance, Minimization, and Mitigation Measures
A brief assessment indicating how the activity will be undertaken in a manner consistent with the Coastal Resources Management Program (CRMP)	CZMA Consistency Certification Section 3.0 – Rhode Island Coastal Program Policies
A brief analysis indicating that the proposed activity, associated facilities, and their effects are consistent with the CRMP.	CZMA Consistency Certification Section 4.0 – Consistency Certification

2.0 Project Information

2.1 Project Timeline

The Project is currently in the planning and engineering design stages. For more details on the Project timeline please see Figure 9 for SouthCoast Wind's indicative construction schedule. The same indicative construction schedule can also be found in COP Section 3.2 – Proposed Project Schedule. The Project will be operational for approximately 30 years, after which time the Project will be decommissioned as per requirements in 30 CFR 585.906-910. Over the 30-year lifespan of the Project, there will be ongoing remote monitoring and maintenance of the offshore and onshore Project facilities.

2.2 Project Overview

The SouthCoast Wind Project includes a Lease Area located in federal waters south of Martha's Vineyard and Nantucket (Figure 2). Wind turbine generators (WTGs) constructed within the Lease Area will deliver power via inter-array cables to the offshore substation platforms (OSPs). The WTG/OSP positions have been established based on a 1 x 1 nm (1.9 x 1.9 kilometer [km]) grid oriented along the cardinal directions to maintain a uniform spacing of WTGs across all the lease areas within the Massachusetts/Rhode Island Wind Energy Area. Submarine offshore export cables will be installed within offshore ECCs to carry the electricity from the OSPs within the Lease Area to the onshore transmission systems via two different ECCs. They Brayton Point ECC will make landfall at Brayton Point, in Somerset, Massachusetts. As noted in Section 1.0, this Consistency Certification is specific to the Project components for the Brayton Point POI located within Rhode Island jurisdiction. Therefore, the balance of the Project description is specific to the Brayton Point ECC and Brayton Point Onshore Project Area, specifically the portion over Aquidneck Island.

The proposed Brayton Point ECC travels north and west from the Lease Area in federal waters through Rhode Island Sound to the Sakonnet River. The ECC travels north up the Sakonnet River and crosses the northern end of Aquidneck Island before returning to Mount Hope Bay. The ECC continues north into Massachusetts state waters to the landfall location at Brayton Point. Portions of the ECC travel through the 2011 and 2018 GLD and Rhode Island state waters.

2.3 Specific Project Details

Each primary Project component is briefly described below in Table 2-1. Additional details may be found in the COP Section 3.0 – Description of Proposed Activities.

Project Attribute	Description
Lease Area Size (Federal waters outside GLDs)	127,388 acres (51,552 hectares [ha]) in federal waters (located outside the 2011 and 2018 GLD)
Offshore Export Cables	Cable Type: High voltage direct current (HVDC)
	Number of export cables: up to 6
	Up to 4 export power cables and up to 2 communication cables (to be installed in 1-2 cable bundles, where practicable)
	Nominal export cable voltage: ±320 kilovolts (kV)
	Corridor width: Up to 2,300 feet (ft) (700 meters [m]) (may be locally narrower or wider in sensitive or constrained areas, including landfalls)
	Length per export cable beneath seabed: 97 – 124 mi (156 – 200 km)
	Length per export cable (within Rhode Island state waters): 20.4 mi (32.9 km)
	Length per export cable (within Rhode Island 2011 GLD): 27 mi (43.8 km)
	Length per export cable (within Rhode Island 2018 GLD): 22.7 mi (36.6 km)
	Cable/pipeline crossings: up to 16 (total)
	Target burial depth (below level seabed): 3.2 – 13.1 ft (1 – 4 m)
Point of Interconnection	Brayton Point, Somerset, MA; Existing National Grid substation

Table 2-1. Key Project Details

2.4 Alternatives Considered

SouthCoast Wind has considered alternative ECC routes between the Lease Area and Brayton Point POI. COP Section 2.0 – Project Siting and Design Development provides a discussion of alternatives considered. These alternatives include: Alternative 1 (East Passage of Narragansett Bay), Alternative 2 (West Passage of Narragansett Bay), and Alternative 3 (northern Sakonnet River near Stone Bridge and Railroad Bridge). The portion of the alternative ECCs passing through the 2011 and/or 2018 GLDs is common to all alternatives and the selected ECC. SouthCoast Wind will use ongoing and recently completed survey results and habitat mapping to further demonstrate that the selected route is the least impacting feasible route. Based on available state mapping and 2021 and 2022 survey data, complete avoidance of certain APCs within the GLD is not feasible.

SouthCoast Wind will also, in its siting of the offshore export cables within the Brayton Point ECC, seek to avoid hard or complex seabed conditions, steep slopes, ledges, extensive shallow water areas, glacial moraine, and mobile seabeds to the extent practicable.

Figure 3 illustrates Areas of Concern, Areas to Avoid, and Preliminary Transmission Cable Routes within the Rhode Island GLDs along with the offshore ECC¹⁰. Locations of glacial moraine mapped for the GLDs are illustrated in Figure 4. However, as illustrated in Figure 3 and Figure 4, complete avoidance of shallow waters and glacial moraines is not feasible given the broad geographic extent of these features. The potential for the offshore export cable installation to affect archaeological resources (e.g., shipwrecks) (Figure 5), shipping lanes (Figure 6), and vessel activity (Figure 7), was also considered in initial siting of the ECC and will be factored into the final routing of the offshore export cables within the ECC as well as the cable burial and protection strategy.

¹⁰ Available from Massachusetts Ocean Management Plan (OMP) Prepared for: SouthCoast Wind Energy LLC

2.5 Affected Environment

SouthCoast Wind has conducted and is conducting marine surveys and related data analysis to characterize the potentially affected resources within the Brayton Point ECC, including the segments within the 2011 and 2018 GLDs. The results of these surveys and analyses will be documented in reports to be filed with BOEM as updates to the SouthCoast Wind COP, and will be discussed in the SouthCoast Wind Rhode Island state permit submittals. In addition, SouthCoast Wind has completed a number of desktop studies which characterize the affected environment. The findings of these desktop studies are documented in technical reports provided in appendices to the COP and are summarized in relevant COP Sections (see Table 1-1).

Recently completed marine surveys and analyses that support a characterization of the affected environment include benthic infaunal sea floor habitat field studies, geophysical and geotechnical (G&G) surveys, and marine archaeological surveys along the offshore export cable corridor. No eelgrass has been mapped by the Rhode Island Department of Environmental Management, CRMC or the Massachusetts Department of Environmental Protection in the vicinity of Brayton Point ECC; therefore, no eelgrass surveys are currently planned. However, surveys may be conducted, if necessary, to support permitting and/or if results of the ongoing benthic surveys reveal evidence of eelgrass beds within the Brayton Point ECC. In addition to field surveys, a number of desktop studies have been completed to further characterize sensitive marine resources in the Brayton Point ECC including: Essential Fish Habitat (EFH) (COP Appendix N), submerged aquatic vegetation (COP Appendix K, Seagrass and Macroalgae), offshore designated protected areas (COP Appendix L1, Designated Protected Areas) and water quality (COP Appendix H, Water Quality). These surveys and studies were used to characterize existing conditions and to evaluate and minimize impacts to sensitive resources within the Brayton Point ECC.

2.6 Potential Project Impacts

Potential Project-related impacts to coastal areas of Rhode Island, including the 2011 and 2018 GLD, may be caused by the installation of the offshore export cables as well as landfall of the export cables, and the installation of the underground onshore export cables. A discussion of Project-related impacts can be found in the COP within the sections identified below:

- COP Section 5.1 Air Quality
- COP Section 5.2 Water Quality
- COP Section 6.1 Coastal and Marine Birds
- COP Section 6.2 Bats
- COP Section 6.3 Terrestrial Vegetation and Wildlife
- COP Section 6.4 Wetlands and Waterbodies
- COP Section 6.5 Coastal Habitats
- COP Section 6.6 Benthic and Shellfish
- COP Section 6.7 Finfish and Invertebrates
- COP Section 6.8 Marine Mammals
- COP Section 6.9 Sea Turtles
- COP Section 7.1 Marine Archaeology
- COP Section 7.2 Terrestrial Archaeology
- COP Section 7.3 Above-Ground Historic Properties
- COP Section 8.0 Visual Resources
- COP Section 9.1 In-Air Acoustics
- COP Section 9.2 Underwater Acoustic Environment

- COP Section 10.1 Demographics, Employment, and Economics
- COP Section 10.2 Environmental Justice and Minority and Lower Income Groups
- COP Section 10.3 Recreation and Tourism
- COP Section 11.0 Commercial and Recreational Fisheries and Fishing Activity
- COP Section 12.0 Zoning and Land Use
- COP Section 13.0 Navigation and Vessel Traffic
- COP Section 14.0 Other Marine Uses

2.7 Avoidance, Minimization, and Mitigation Measures

SouthCoast Wind's design and planning process seeks to avoid and minimize construction-related impacts to the coastal environment. Many of the unavoidable Project-related impacts will be isolated and/or temporary in nature. Temporary impacts within the GLDs will include the installation of the export cables. The COP provides additional details on avoidance, minimization, and mitigation measures for specific resources in COP Section 16.0 – Summary of Avoidance, Minimization, and Mitigation Measures of Potential.

3.0 Rhode Island Coastal Program Policies

Table 3-1 details the enforceable policies of the State of Rhode Island that relate to the Project, and demonstrates how the Project, as proposed, is consistent with each of these policies and their underlying authorities. The enforceable policies and guidelines are found in the CRMP Red Book (650-RICR-20-00-1) and associated guidance document, as well as the Special Area Management Plans and Energy Amendments Policy Guide published October 2011. Enforceable policies are discussed. General policies, which are not enforceable, are omitted. The Legal Authority for the coastal policies detailed in the CRMP Red Book include the federal Coastal Zone Management Act of 1972 (16U.S.C §§ 1451 through 1466) and Rhode Island General Laws Chapter 46-23.

Table 3-1. Enforceable Policies of the CRMP

Policy #	Policy Requirement	SouthCoast Wind Response	COP S
Ocean SAMP Reg	ulatory Standards		
Overall Regulatory Standards Part 11.10.1 (A)	Offshore renewable energy development in the state waters of the Ocean SAMP, regardless of size are subject to policies and standards outlined in Part 11.10.	The Project meets the definition of Offshore Development under 11.10.1 (A)(3) Underwater Cables.	COP Section 3.0 – Description of F 3.1 – Proposed Project Location 3.3 – Project Components and Pr 3.3.5 - Offshore Export Cables 3.3.6 - Sea-to-Shore Transition 3.3.7 - Onshore Underground I
Overall Regulatory Standards Part 11.10.1 (C)	Offshore development shall not have a significant adverse impact on natural resources or existing human uses, particularly the Rhode Island marine economic sector.	The Project involves the installation of a commercial-scale array of offshore WTGs within an established federal lease area for wind energy generation, which will produce clean, renewable energy for the ISO New England regionally administered electric grid. The generation capacity from the Project would be available for future Power Purchase Agreements (PPAs) that may be negotiated with other New England states, including Rhode Island. Offshore: The federal Lease Area proposed for the Project is outside of Rhode Island state waters and is also beyond the 2011 and 2018 GLD areas. The Brayton Point ECC crosses the 2011 and 2018 GLD and enters State waters.	COP Section 2.0 – Project Siting at 2.1 – Offshore Facilities 2.1.6 – Offshore Export Cables 2.1.6.1 – Offshore Export Ca 2.2 – Onshore Facilities 2.2.1 – Landfall Location 2.2.1.1 – Landfall Locations 2.2.2 – Sea-to-Shore Transition 2.2.2.1 – Sea-to-Shore Transition
		To transmit electricity generated from the offshore WTG array to the onshore administered electrical grid, the shortest practicable path to shore will be utilized while considering engineering feasibility, environmental constraints, existing water uses, and regulatory concerns. SouthCoast Wind has assessed alternative routes for the ECCs, as well as potential landfall locations. The evaluation of these alternatives is detailed within the COP Section $2.0 - Project$ Siting and Design Development. As noted in Section 2.4, the alternative ECCs considered for the Brayton Point POI share a common route for the portion of the ECC located within the GLDs. Potential impacts to natural resources and existing marine uses are primarily associated with construction period impacts. SouthCoast Wind is and will continue to work closely with commercial and recreational fishing interests on mitigation of potential impacts to their operations. Mitigation of temporary impacts associated with construction safety zone, gear interaction/loss and port usage are described in COP Section 16.0 - Summary of Avoidance, Minimization, and Mitigation Measures of Potential Impacts. Potential impacts to vessels and navigation as well as other marine uses are discussed in COP Section 13 – Navigation and Vessel Traffic and Section 14 - Other Marine Uses (Military Uses, Aviation, Offshore Energy, and Cables and Pipelines). Installation of the cables within the ECC will result in temporary disturbance of bottom habitats through direct disturbance or indirect effects of sedimentation to adjacent areas. As discussed in COP Section activities. The time period for recolonize the affected area following construction activities. The time period for recolonize the affected area following construction activities. The time period for recolonize the affected area following construction activities. The time period for recolonize the affected area following construction activities. The time period for recolonize the affected area following construction activi	 COP Section 3.0 – Description of F 3.1 – Proposed Project Location 3.3 – Project Components and P 3.3.5 – Offshore Export Cables 3.3.6 – Sea-to-Shore Transition 3.3.6.6 – HDD Locations on J 3.3.6.7 – Construction and Ir 3.3.6.8 – Operation and Mair 3.3.6.9 – Decommissioning 3.4 – Summary of Impact-Product 3.4.1 – Seabed (or Ground) Di 3.4.1.1 – Offshore Export Ca 3.4.1.1.1 – Seabed Disturb 3.4.9 – Activities that may Disp COP Section 10.0 – Socioeconomi COP Section 11.0 – Commercial at COP Section 13.0 – Navigation and COP Section 14.0 – Other Marine I and Cables and Pipelines) COP Appendix F3 – Hydrodynamic Brayton Point Export Cable Burial J COP Appendix M - Benthic and Sh COP Appendix X - Navigation Safe

Section Reference

Proposed Activities n I Project Stages es ion d Export Cable

and Design Development

les Cable Corridors Selected for PDE

ns Selected for PDE

tion

ansition Selected for PDE

Proposed Activities

l Project Stages

les

tion

on Aquidneck Island (Intermediate Landfall)

Installation

laintenance

lucing Factors

Disturbance

Cable and Inter-Array Cable Installation

urbance – Seabed Preparation and Cable Burial

Disturbance – Horizontal Directional Drilling

isplace or Impact Fishing, Recreation, and Tourism

mic Resources

and Recreational Fisheries and Fishing Activity

and Vessel Traffic

e Uses (Military Uses, Aviation, Offshore Energy,

Avoidance, Minimization, and Mitigation

nic and Sediment Transport Modeling for the al Assessment

signated and Protected Areas Report

Shellfish Resources Characterization Report

and Recreational Fisheries Technical Report

afety Risk Assessment

Policy #	Policy Requirement	SouthCoast Wind Response	COP
		implement mitigation to address unavoidable adverse impacts. SouthCoast Wind expects to work with CRMC to ensure that the Project is consistent with this policy requiring the assessment of siting project facilities within alternative coastal locations.	
Overall Regulatory Standards Part 11.10.1 (D	A meeting between the Fisherman's Advisory Board (FAB), the applicant and CRMC is required to discuss potential fishery impacts.	SouthCoast Wind, in coordination with CRMC, held a Project Overview meeting with the RI Fisherman's Advisory Board (FAB) and the RI Habitat Advisory Board (HAB) on May 26, 2022.	COP Section 6.0 – Biological Reso 6.6 – Benthic and Shellfish 6.6.1 – Affected Environment
through G)Uses or activities that would result in significant long-term impacts (i.e., more than 1 or 2 seasons) to commercial or recreational fisheries are prohibited.Mitigation is required for potential adverse impacts on fisheries.	As part of the ongoing studies, an EFH assessment has been conducted. The EFH Assessment concluded that when Project activities are considered together with the existing EFH in the Offshore Project Area, the potential for negative effects associated with the construction, operation, and decommissioning of the Project on EFH are limited in scale and considered to be very low to low. The Project is not expected to cause population level changes to EFH species or resident, migratory, and/or or protected fish species. The ECC cable construction and operations will not prohibit fish movements, present an obstacle to migration, and/or displace large populations of fish. The Project will not cause long-term or permanent negative impacts to EFH or Habitat Areas of Particular Concern available to support fish of recreational and/or commercial importance. SouthCoast Wind is	6.6.1.4 – Brayton Point Exp 6.6.1.6 – Benthic Seafloor S 6.6.1.6.4 – Brayton Point 6.6.2 – Potential Effects 6.6.2.1 – Introduced Sound 6.6.2.2 – Disturbance of So 6.6.2.3 – Introduction of No 6.6.2.4 – Change in Ambier 6.6.2.5 – Planned Discharg 6.6.2.6 – Accidental Events	
		undertaking a habitat mapping effort based on recently completed G&G and benthic surveys to support consultation with NMFS. It is anticipated that the habitat mapping and anticipated consultation with NMFS will further support this consistency determination.	 6.7 – Finfish and Invertebrates 6.7.1 - Affected Environment 6.7.2 - Species in the MA/RI V 6.7.3 - Invertebrates in the Of
		Correspondingly, the Project is not anticipated to cause long-term or permanent negative impacts to commercial or recreational fisheries.	6.7.4 – Potential Effects 6.7.4.1 – Introduced Sound
	SouthCoast Wind continues to coordinate with local stakeholders and the commercial fishing industry and has developed a Fisheries Communication Plan for the Project (see COP Appendix W, SouthCoast Wind Fisheries Communication Plan), which included hiring of an on-staff fisheries liaison officer, conducting outreach to the commercial and recreational fishing industry, and holding regular "port hours" at key ports where the public can communicate and interact with a SouthCoast Wind representative and ask questions about the Project or discuss any concerns related to potential impacts to fisheries.	 6.7.4.2 – Seabed (Or Groun 6.7.4.3 – Habitat Disturbanc 6.7.4.4 – Change in Ambien 6.7.4.5 – Change in Ambien 6.7.4.6 – Planned Discharge 6.7.4.7 – Accidental Events COP Section 11.0 – Commercial a 	
		The Brayton Point ECC has been evaluated for technical feasibility and environmental considerations, as well as the amount of dredging required. The ECC crosses some areas mapped as Areas of Concern and Areas to Avoid for Transmission Cables, as well as Glacial Moraines and Fishing Areas (see Figure 3 and Figure 4). The Brayton Point ECC will be up to 2,300 ft (700 m) in width (and may be locally narrower or wider in sensitive or constrained areas) and is intended to allow maximum flexibility to refine siting to avoid sensitive habitats and resources. Not all sensitive habitat and resource areas can be avoided. Export cable installation will temporarily alter the seabed habitat, resulting in some effects associated with mortality and displacement during construction and some effects associated with recovery time from the areas affected by the cable placement. Disturbance of the benthic communities with complex bottom habitat conditions are expected to require from one to three years to recover (COP Appendix M1, Benthic and Shellfish Resources Characterization Report and COP Appendix M3, Summer 2021 Benthic Survey Reports). Construction related impacts are expected to be temporary.	 11.1 – Affected Environment 11.1.2 – Summary of Commer 11.1.3 – Recreational Fishing 11.1.4 – Fisheries Outreach 11.1.5 – Proposed Fisheries M 11.2 - Potential Effects 11.2.1 – Vessel Activity and Pr 11.2.3 – Gear Interactions COP Appendix M - Benthic and Sh COP Appendix N – Essential Fish Assessment COP Appendix V – Commercial ar COP Appendix W - SouthCoast W
Overall Regulatory Standards Part 11.10.1 (H, I and J)	Moraine edges, spawning and nursery areas and marine resources and habitats are sensitive and important habitats that shall be protected and impacts to these areas avoided. Coordination with the Habitat	SouthCoast Wind evaluated alternative Brayton Point ECCs with respect to engineering feasibility, environmental constraints, existing water uses, and regulatory concerns. The selected Brayton Point ECC seeks to avoid and minimize impacts to glacial moraines, spawning and nursery areas, and marine resource and habitats. However, as illustrated in Figure 3 the planned ECC does not avoid all CRMC mapped glacial moraines.	COP Section 2.0 – Project Siting a 2.1 – Offshore Facilities 2.1.6 – Offshore Export Cable 2.1.6.1 – Offshore Export Ca 2.2 – Onshore Facilities 2.2.1 – Landfall Location 2.2.1.1 – Landfall Locations

esources

nt xport Cable Corridor Substrate Classifications nt Export Cable Corridor nd into the Environment (in-Air or Underwater) oftbottom Habitat and Species lovel Hardbottom Habitat ent EMF ges ts ht. I WEA and the Offshore Project Area Offshore Project Area d into the Environment (In-air or Underwater) und) Disturbance nce and Modification ent Lighting ent EMF ges ts and Recreational Fisheries and Fishing Activity ercial Fishing in the Offshore Project Area ng Monitoring Research and Activities Presence of Infrastructure Shellfish Resources Characterization Report sh Habitat Assessment and Protected Fish Species

and Recreational Fisheries Technical Report Wind Fisheries Communication Plan

g and Design Development

les Cable Corridors Selected for PDE

ns Selected for PDE

Policy #	Policy Requirement	SouthCoast Wind Response	COP S
	Advisory Board (HAB) and the CRMC is required.	Seafloor features such as moraines have been mapped in more detail using acoustic data from recently completed G&G surveys (COP Appendix E.2, Geohazard Report for the Brayton Point Export Cable Corridor]). These maps define the limits and topography of the moraines in more detail and will be used to optimize the routing of cables within the Brayton Point ECC to avoid or reduce disturbance to sensitive and important habitats. As noted above, SouthCoast Wind is completing a habitat mapping analysis in support of	 2.2.2 – Sea-to-Shore Transition 2.2.2.1 – Sea-to-Shore Transi COP Section 3.0 – Description of Pr 3.1 – Proposed Project Location 3.3 – Project Components and Pro
		As noted above, SouthCoast which is completing a nabitat mapping analysis in support of the NMFS EFH consultation. That analysis will supply additional information needed to provide the above demonstrations with respect to glacial moraines, spawning and nursery areas.	 3.3.5 – Offshore Export Cables 3.3.6 – Sea-to-Shore Transition 3.3.6.6 – HDD Locations on A 3.3.6.7 – Construction and Ins 3.3.6.8 – Operation and Maint 3.3.6.9 – Decommissioning 3.4 – Summary of Impact-Produci 3.4.1 – Seabed (or Ground) Dis 3.4.1.1 – Offshore Export Cab 3.4.1.1.1 – Seabed Disturba 3.4.1.3 Vessel Anchoring–Ca 3.4.4 - Changes in Ambient Eleg 3.4.5 – Planned Discharges 3.4.6 – Accidental Events
			COP Section 6.0 Biological Resource
		 6.5 – Coastal Habitats 6.5.1 – Affected Environment 6.5.1.1.1 – Seagrass 6.5.1.1.2 – Macroalgae 6.5.1.1.3 – Submerged Aqu 6.5.2 – Potential Effects 6.5.2.1 – Seabed (or Ground) 6.5.2.2 – Changes in Ambient 6.5.2.3 – Changes in Ambient 6.5.2.4 – Actions that may Dis and Macroalgae) 6.5.2.5 – Actions that may Ca 6.5.2.6 – Planned Discharges 6.5.2.7 – Accidental Events 6.6 – Benthic and Shellfish 6.6.1.6 – Benthic Seafloor Sul 6.6.1.6 – Benthic Seafloor Sul 6.6.1.7 – Benthic Epifauna an 6.6.2 – Potential Effects 6.6.2.1 – Introduced Sound in 6.6.2.3 – Introduction of Nove 6.6.2.4 – Change in Ambient I 6.6.2.5 – Planned Discharges 6.6.2.6 – Accidental Events 	
			Corridor COP Appendix L1 – Offsho
			COP Appendix M - Benthic and She

P Section Reference

tion

ansition Selected for PDE

of Proposed Activities

I Project Stages

les

tion

on Aquidneck Island (Intermediate Landfall)

Installation

laintenance

ducing Factors

Disturbance

Cable and Inter-Array Cable Installation

urbance – Seabed Preparation and Cable Burial

Disturbance – Horizontal Directional Drilling

–Construction, Operation, and Decommissioning

Electric and Magnetic Fields

ources

Aquatic Vegetation Beds

Ind) Disturbance

ient Lighting

ient EMF

Displace Biological Resources (Eelgrass

Cause Direct Injury or Death ges

t port Cable Corridor Substrate Classifications t Export Cable Corridor and Infauna

nd into the Environment (in-Air or Underwater) oftbottom Habitat and Species lovel Hardbottom Habitat ent EMF ges ts

Report for the Brayton Point Export Cable fshore Designated Protected Areas Report Shellfish Resources Characterization Report

Policy #	Policy Requirement	SouthCoast Wind Response	COP
			COP Appendix N – Essential Fish Assessment
Standards	Cultural and Historic Resources. Potential impacts to these resources will be evaluated per the National Historic Preservation Act and Antiquities Act, and the Rhode Island Historical Preservation Act and Antiquities Act, as applicable.	A comprehensive assessment of potential Project impacts to marine cultural and historic resources has been completed as part of Project studies and assessments for the Brayton Point ECC (see COP Section 7.1 and COP Appendix Q –Marine Archaeological Resources Assessment). SouthCoast Wind will continue to coordinate with the Rhode Island Historic Preservation and Heritage Commission and Tribal representatives to ensure that impacts are evaluated, and, if necessary, mitigated for, in accordance with applicable federal and state regulations. The Project has been sited to avoid or minimize direct and indirect impact to cultural and historic resources.	COP Section 7.0 7.1 – Marine Archaeology 7.1.1 – Affected Environment 7.1.1.1 – Shipwrecks and Ol 7.1.1.2 – Paleolandscape 7.1.2 – Potential Effects 7.1.2.1 – Seabed (or Ground 7.1.2.2 – Sediment Suspens COP Appendix Q –Marine Archaeo
Standards	Visual Impact Assessment may be required in relation to potential impacts on cultural or historic resources, as well as for the potential visual impacts of the project overall.	All Project features within the Rhode Island GLDs are below the seabed. Therefore, these policies are not applicable to the Brayton Point ECC.	
Concern Part 11.10.2	All offshore development shall be presumptively excluded from Areas of Particular Concern (APCs) unless the applicant demonstrates that there are no practicable alternatives that are less damaging outside the APC or that the project will not result in significant alteration to the values and resources of the APC. Avoidance measures must be demonstrated, and mitigation may be required.	 APCs in the Ocean SAMP include: historic shipwrecks, archaeological or historical sites and their buffers, offshore dive sites, glacial moraines, navigation, military and infrastructure areas areas of high fishing activity seasonal heavily used recreational boating and sailboat racing areas naval fleet submarine transit lanes other areas as identified during pre-application review Additional details for each type of APC are provided below. Shipwrecks - Numerous wrecks are mapped in state and federal waters off the coast of Rhode Island. Additional details on wrecks of cultural/historical significance identified within the Offshore Project Area are addressed in the Marine Archaeological Resources Assessment for the Project (COP Appendix Q). As with all APCs, disturbance to shipwrecks and other submerged historic resources will be avoided and mitigated if avoidance is not feasible. Recently completed G&G surveys provide additional supporting data to allow for micro-siting within the Brayton Point ECC to avoid shipwrecks. Dive Sites: The two closest offshore dive sites to the Brayton Point ECC are the T.C. Teti site located adjacent to but outside the ECC, and the Neptune site located approximately 4 mi (6 km) southwest of the ECC The Brayton Point ECC will not cross directly through any designated offshore dive sites. Glacial Moraines: The Brayton Point ECC passes over known glacial moraines associated with the Buzzards Bay Moraine and the Martha's Vineyard Moraine. Based on review in support of the Summer 2021 benthic habitat survey and geophysical and acoustic survey, the Brayton Point ECC will cross through blocky, boulder, and bounder/cobble/sand moraines mapped in the Ocean SAMP area, as such complete avoidance of glacial moraines are to solar Sharp area, as such complete avoidance of glacial using acoustic data as part of the cable route planning process (COP Appendix E, Marine	 COP Section 4.0 - Site Geology and 4.1 - Site Geology 4.1.4 - Affected Environment 4.1.4.3 - Brayton Point Exponential Effects 4.1.5 - Potential Effects 4.1.5.1 - Seabed Disturbance COP Section 7.0 - Cultural Resour 7.1 - Marine Archaeology 7.1.1 - Affected Environment 7.1.1.2 - Paleolandscape 7.1.2 - Potential Effects 7.1.2.1 - Seabed (or Ground 7.1.2.2 - Sediment Suspens COP Section 10.0 - Socioeconomia 10.3 - Recreation and Tourism COP Section 11.0 - Commercial at 11.1 - Affected Environment 11.3 - Recreational Fishing 11.4 - Fisheries Outreach 11.5 - Proposed Fisheries M 11.2 - Vessel Activity and Pr 11.2.3 - Gear Interactions COP Section 13.0 - Navigation an COP Section 14.0 - Other Marine and Cables and Pipelines) COP Appendix E - Marine Site Inversion

P Section Reference

h Habitat Assessment and Protected Fish Species

Obstructions

nd) Disturbance nsion and Deposition

eological Resources Assessment

and Environmental Conditions

nt port Cable Corridor

ince

ources

Obstructions

und) Disturbance nsion and Deposition

mic Resources

I and Recreational Fisheries and Fishing Activity

ercial Fishing in the Offshore Project Area g

Monitoring Research and Activities

Presence of Infrastructure

and Vessel Traffic e Uses (Military Uses, Aviation, Offshore Energy,

nvestigation Report (MSIR)(pending)

Policy #	Policy Requirement	SouthCoast Wind Response	COPS
		Site Investigation Report [MSIR]). These maps will define the limits and topography of the moraines in more detail and will be used to optimize the routing of cables within the Brayton Point ECC to avoid or reduce disturbance and protect the cables.	COP Appendix L1 – Offshore Desig COP Appendix M.3 – Benthic Habi Consultation
		Navigation: The Brayton Point ECC will cross through two designated shipping lanes and one ferry route (Quonset Point to Martha's Vineyard Fast Ferry Route) within the Ocean SAMP area. The Brayton Point ECC avoids all other mapped navigation, military, and infrastructure areas in the Ocean SAMP area.	COP Appendix Q –Marine Archaec COP Appendix V – Commercial an COP Appendix X - Navigation Safe
		Unexploded Ordnance (UXO): The Brayton Point ECC will pass in the vicinity of known UXO locations and within 29 miles (47 km) of a UXO disposal site. However, the Brayton Point ECC does not encompass known UXO locations.	
		High Fishing Activity: Areas of high fishing activity can be discussed with the CRMC and RI fishermen during the upcoming meetings with those entities. Figure 4 Illustrates the location of fixed and mobile fishing gear as well as recreational fishing areas.	
		Boating/Racing Areas: The Brayton Point ECC does not pass through any designated boating and sailboat racing areas.	
		Naval Fleet Submarine Transit lanes: The U.S. Navy has designated Submarine Transit Lanes for submerged transit. One of these lanes overlaps with the southern border of the Ocean SAMP area. Based on this description, the Brayton Point ECC does not cross a designated transit lane. Detailed information on submarine transits through the SAMP area is unavailable as this information is classified.	
		Per Ocean SAMP § 11.10.2(B), all offshore development, which includes submerged cables, is presumptively excluded from Areas of Particular Concern (APCs). However, this exclusion is rebuttable if the applicant can demonstrate by clear and convincing evidence that there are no practicable alternatives that are less damaging in areas outside of the APC, or that the proposed Project will not result in a significant alteration to the values and resources of the APC.	
		Figure 4 shows the Brayton Point ECC in relation to glacial moraines and commercial/recreational fishing. Figure 5 illustrates the location of the Brayton Point ECC in relation to shipping channels. SouthCoast Wind has endeavored to site the ECC to avoid APCs. However, complete avoidance of these areas is not feasible. Therefore, SouthCoast Wind is required to demonstrate:	
		 There are no practicable alternatives that are less damaging in areas outside of the APC; 	
		 All feasible efforts have been made to avoid damage to APC resources and values; and 	
		3) There will be no significant alteration of the APC resources or values.	
		SouthCoast Wind has completed a habitat mapping analysis in support of the NMFS EFH consultation (COP Appendix M.3, Benthic Habitat Mapping to Support Essential Fish Habitat Consultation). That analysis has supplied additional information needed to provide the above demonstrations with respect to glacial moraines. SouthCoast Wind continues to coordinate with local stakeholders and the commercial fishing industry to address areas of high fishing activity within the Brayton Point ECC.	
		The results of the above referenced habitat mapping in combination with consultations with commercial and recreational fishing interests, as well as evaluations presented in the BOEM DEIS are intended to provide information needed to support the above demonstrations.	

P Section Reference

esignated Protected Areas Report abitat Mapping to Support Essential Fish Habitat

aeological Resources Assessment and Recreational Fisheries Technical Report Gafety Risk Assessment

Policy Requirement	SouthCoast Wind Response	COP S
Areas designated for preservation are designated for the purpose of preserving them for their ecological value. Large-scale offshore development that is in conflict with the intent and purpose of these areas is prohibited. Underwater cables are exempt from this prohibition.	 Areas designated for preservation in the Ocean SAMP include: Sea duck foraging habitat Critical Habitat under the Endangered Species Act The Ocean SAMP designates sea duck foraging habitat in water depths less than or equal to 65.6 ft (20 m) as an area designated for protection due to the ecological value of these foraging areas to avian species. In lieu of more detailed information on bottom substrate and bivalve density, CRMC preemptively designated all areas within the 65.6 ft (20 m) contour as an area designated for protection until further research allows for a more refined determination (CRMC, 2010). The Brayton Point ECC does not pass through designated sea duck foraging habitat, and as an underwater cable, would be exempt from the prohibition for crossing these areas. Critical habitat for the North Atlantic Right Whale is located along the Atlantic coast, north and west of the SouthCoast Wind Lease Area. The Brayton Point ECC crosses a corner of the North Atlantic Right Whale Seasonal Management Area. Given the abundance and distribution of these whales in the area, there is the potential for North Atlantic Right Whales to co-occur with activities in the Project Area, particularly in the proposed export cable corridor during the winter and spring. However, little, if any, effects to North Atlantic Right Whale critical habitat are anticipated given its position in relation to the Offshore Project Area. Although other Endangered Species Act listed species may be present in the Project Area, there are no other critical habitats designated given its position Point ECC. 	COP Section 6.0 – Biological Reso 6.1 – Coastal and Marine Birds 6.1.1 – Affected Environment 6.1.1.2 – Marine Birds 6.1.2.5 – Sea Ducks 6.1.2 – Potential Effects 6.1.2.1 – Seabed (or Ground 6.1.2.2 – Introduced Sound 6.1.2.3 – Changes to Ambier 6.1.2.4 – Vessel Operations 6.1.2.5 – Presence of Structu 6.1.2.6 – Planned Discharges 6.1.2.7 – Accidental Events 6.8 – Marine Mammals 6.8.1 – Affected Environment 6.8.2.2 – Potential Effects 6.8.2.1 – Introduced Sound in 6.8.2.3 – Seabed (or Ground 6.8.2.4 – Habitat Disturbance 6.8.2.6 – Planned Discharges 6.8.2.7 – Accidental Events
		COP Appendix L1 - Offshore Desig COP Appendix O – Marine Mamma
Large-scale projects found to be a hazard to commercial navigation shall avoid areas of high intensity commercial marine traffic in state waters.	Areas of high intensity commercial marine traffic in state waters, defined as 50 or more vessel counts within a 1 km by 1 km grid, are identified as an "Other Area" in the Ocean SAMP – i.e., an area for which some offshore developments could represent a hazard to commercial navigation. An area running east to west along the entire coast of Rhode Island registers as high intensity based on the above definition (Figure 7). However, the area crossed by the Brayton Point ECC within the GLD has relatively lower intensity use (at 50 to 250 vessel counts for commercial ship traffic) than most of the Rhode Island coast, in particular the offshore area directly approaching and entering Narragansett Bay (Figure 8). SouthCoast Wind conducted a Navigation Safety Risk Assessment for the Brayton Point ECC, which is included in COP Appendix X.	 COP Section 13.0 – Navigation and 13.1 – Affected Environment 13.2 – Potential Effects 13.2.2 - Activities that may Disp Recreation and Tourism COP Section 14.0 – Other Marine I 14.1 – Affected Environment 14.1.4 – Cables and Pipelines 14.2 – Potential Effects 14.2.2 – Installation and Mainte 14.2.3 – Presence of Infrastruct
	Areas designated for preservation are designated for the purpose of preserving them for their ecological value. Large-scale offshore development that is in conflict with the intent and purpose of these areas is prohibited. Underwater cables are exempt from this prohibition.	 Areas designated for preservation are designated for preservation in the Ocean SAMP include: Areas designated for the purpose of preserving them for their ecological value. Large-scale projects found to be a hazard to commercial navigation shall avoid areas of high intensity commercial maxime traffic in state waters. Large-scale projects found to be a hazard to commercial navigation shall avoid areas of high intensity commercial maxime traffic in state waters. Areas of high intensity commercial maxime traffic in state waters.

COP Appendix X – Navigation Safety Risk Assessment

Section Reference

sources

Ind) Disturbance ient Lighting าร ctures ges

Threatened Marine Mammals

d into the Environment (In-air or Underwater) าร nd) Disturbance

ges

signated Protected Areas Report mal and Sea Turtle Monitoring and Mitigation Plan

and Vessel Traffic

Displace or Impact Fishing and

ne Uses

intenance of Infrastructure ructure

4.0 Consistency Certification

SouthCoast Wind has evaluated all applicable enforceable policies of the Rhode Island CRMP for the Project to determine if the activities within the GLD are consistent with those policies.

SouthCoast Wind has collected benthic and geophysical field data within the full marine export cable corridor and has prepared a detailed habitat mapping report (COP Appendix M.3) to support BOEM's EFH consultation with NMFS. This habitat mapping is also intended to further support cable routing and clarify impacts assessment. The EFH Consultation has initiated between BOEM and NMFS the issuance of BOEM's EFH Assessment. These survey data and mapping are also intended to more fully map habitat in the Sakonnet River, Mount Hope Bay, and offshore glacial moraine areas, and to evaluate the potential impacts on Atlantic cod habitat.

SouthCoast Wind is confident that the Brayton Point ECC within the GLDs will be developed in a manner consistent with enforceable policies of Rhode Island's approved CRMP.

RHODE ISLAND COASTAL ZONE MANAGEMENT ACT CONSISTENCY CERTIFICATION - BRAYTON POINT EXPORT CABLE CORRIDOR



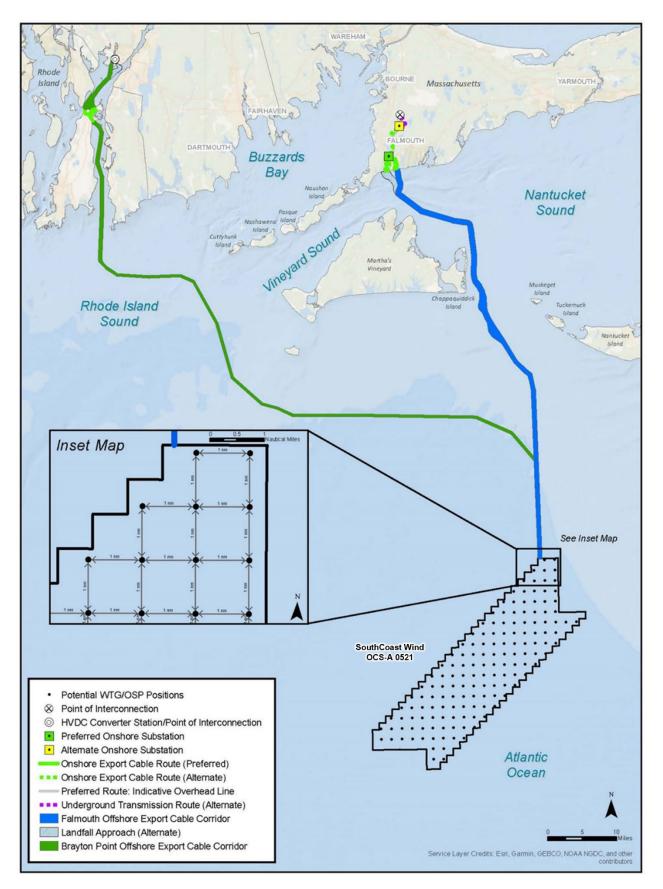


Figure 1. Overview of SouthCoast Wind Offshore Renewable Energy Generation Project

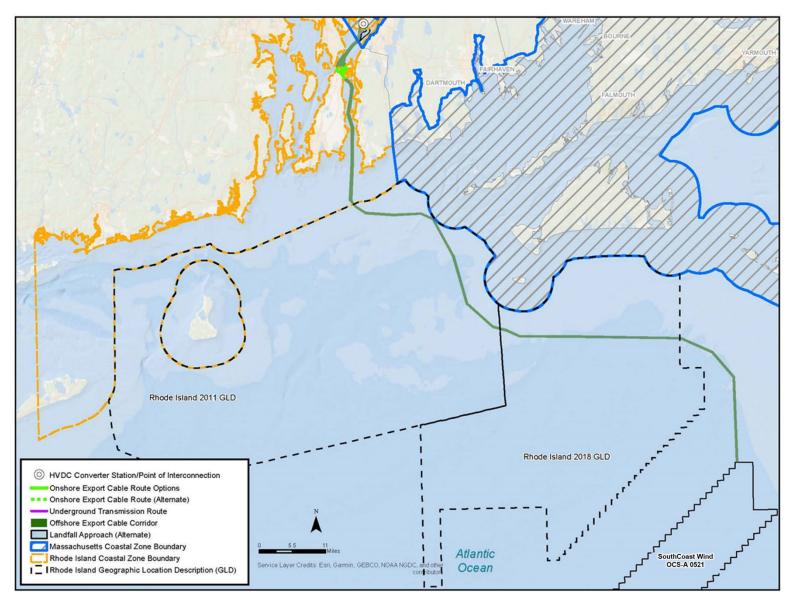


Figure 2. Location of the Brayton Point ECC within the Rhode Island GLD Boundaries

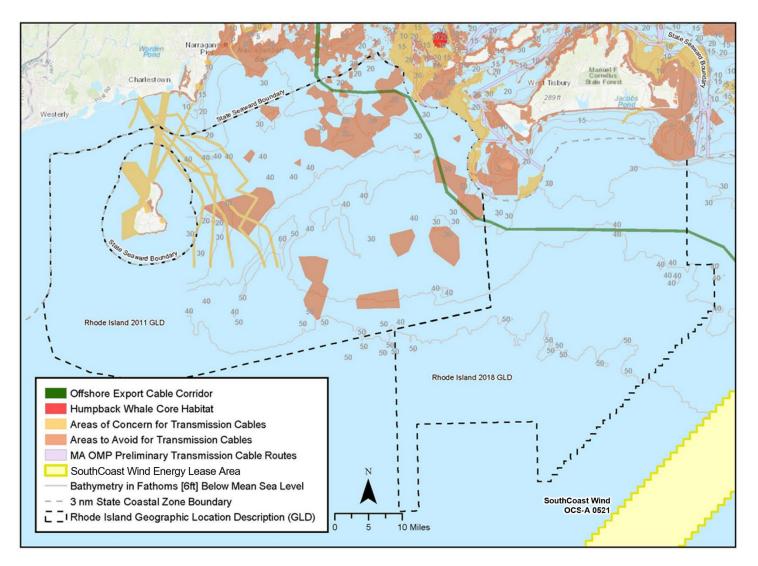


Figure 3. Areas of Concern and Areas to Avoid within Rhode Island GLD Boundaries¹¹

¹¹ Sources: Areas to Avoid and Areas of Concern for Siting of Potential Offshore Wind Transmission Cables Corridors, 2015 Massachusetts Ocean Management Plan http://maps.massgis.state.ma.us/czm/moris/metadata/moris om areas to avoid cables poly.htm and http://www.crmc.ri.gov/windenergy.html

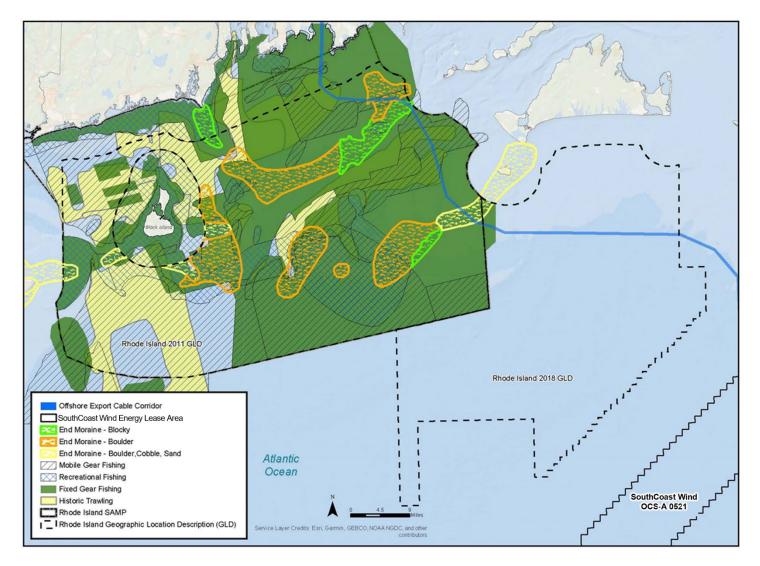


Figure 4. Glacial Moraines and Fishing Areas within the Rhode Island GLD Boundaries¹²

¹² Fishing Areas (Commercial Fixed and Mobile Gear; Recreational). URI Environmental Data Center/RIGIS. Updated October 2009. Accessed July 14, 2021. http://www.narrbay.org/d_projects/oceansamp/gis_fisheries.htm and Glacial Geology; GLD from http://www.crmc.ri.gov/windenergy.html

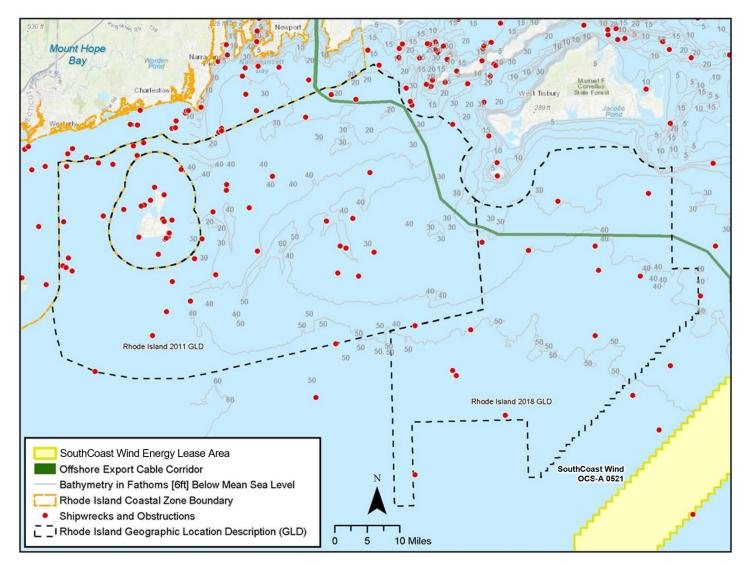


Figure 5. Marine Archaeology (Shipwrecks and Obstructions) within the Rhode Island GLD Boundaries¹³

¹³ Sources: RICMC and RICZM credits, NOAA. Public Wrecks and Obstructions. 2016. Accessed July 14, 2021. <u>https://nauticalcharts.noaa.gov/data/wrecks-and-obstructions.html</u>. RI GLD http://www.crmc.ri.gov/windenergy.html

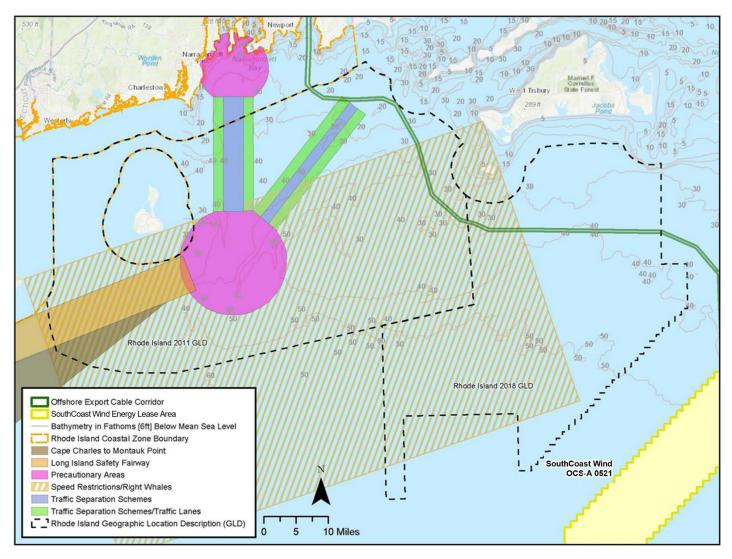


Figure 6. Shipping Lanes within the Rhode Island GLD Boundaries¹⁴

¹⁴ Sources: Shipping Fairways, Lanes, and Zones for US waters. NOAA. Published 12/4/2015. Accessed July 14, 2021. <u>https://nauticalcharts.noaa.gov/data/gis-data-and-services.html#enc-direct-to-gis</u> and GLD from http://www.crmc.ri.gov/windenergy.html

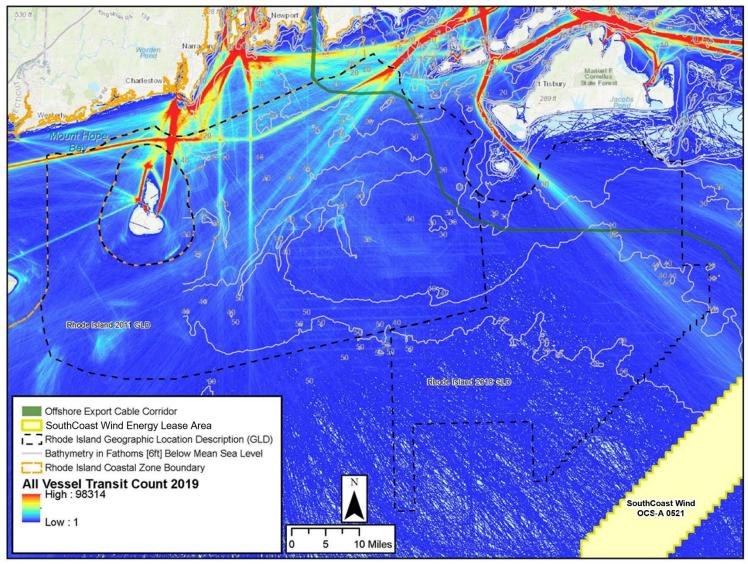
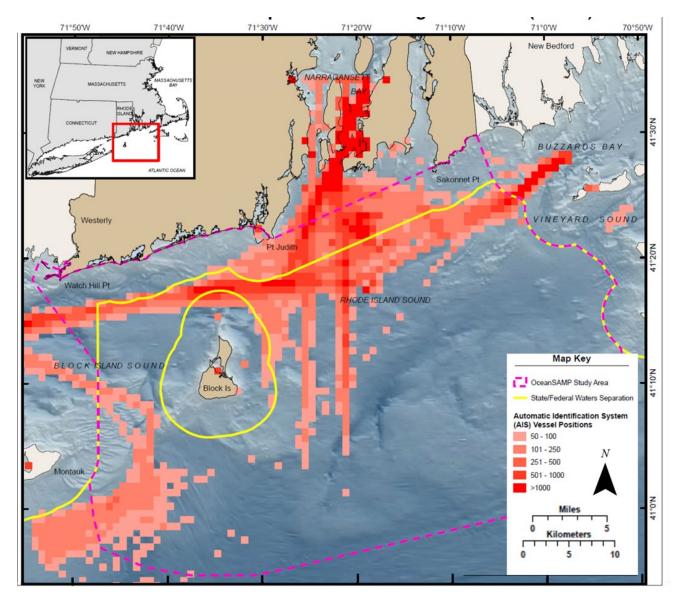


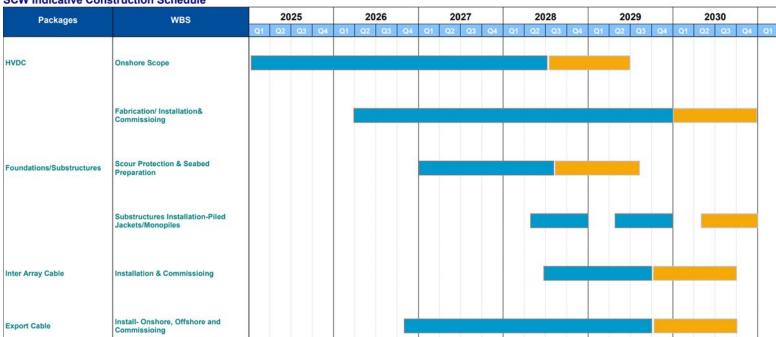
Figure 7. Vessel Activity in the Rhode Island GLD Boundaries¹⁵

¹⁵ Sources: All Vessel Transit Counts from - 2019 AlS Northeast and Mid-Atlantic United States. Northeast Regional Ocean Council Northeast Ocean Data. Published April 2020. Accessed July 14, 2021, <u>https://portal.midatlanticocean.org/visualize</u> and GLD from http://www.crmc.ri.gov/windenergy.html



Source: Adapted from the Rhode Island Ocean Special Area Management Plan (CRMC, 2010)

Figure 8. Commercial Ship Traffic in the Rhode Island GLD



SCW Indicative Construction Schedule

Installation & Commissioing

P1 Activity

Figure 9. SouthCoast Wind Indicative Construction Schedule

WTG

P2 Activity

2031

02 03 04